

2137 BO

**From:** Jesse Barber [jessebarber@boisestate.edu]  
**Sent:** Thursday, March 15, 2012 1:45 AM  
**To:** AETC/A7P Workflow  
**Subject:** F35 Draft EIS Comment  
**Attachments:** Barber\_comments.pdf

Please find my comments on the F35 Draft EIS attached.

Jesse

--  
Jesse R. Barber  
Assistant Professor  
Dept. of Biological Sciences  
Boise State University  
Boise, ID 83725-1515  
Office: 208-426-3202  
<http://biology.boisestate.edu/faculty-and-staff/faculty/jesse-barber/>

### United States Air Force Public Hearing Comment Form F-35A Training Basing Environmental Impact Statement (EIS)



2137 BO

Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways:

- 1) Turn in this form at the comment table before you leave tonight.
- 2) Provide oral comments to the court reporter during the open house session or public hearing.
- 2) Mail, fax or email comments to:

David Martin, Air Force Contractor, and Kim Fornoff  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX 78150-4319  
Fax: 210-652-5649  
Email: aetc.a7cp.inbox@us.af.mil

All comments on the Draft EIS must be postmarked or received by March 14, 2012, to ensure they become part of the official record. All comments will be addressed in the Final EIS.

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name: Dr. Jesse Barber  
Organization/Affiliation: Boise State University, Dept. of Biology  
Address: 1910 Univ. Dr. Boise, ID 83725-1515  
City, State, Zip Code: 208-426-3202

Comments: The noise analysis for impacts on wildlife is not appropriate. The last ten years of peer-reviewed science has not been included in the analysis. This EIS will not stand-up to a moderate level of scrutiny.

Please see (for example): the following reviews →

Barber et al. (2011) Anthropogenic Noise exposure in protected natural areas: estimating the scale of ecological consequences. Landscape Ecology 26: 1281-1295.

Barber, Crooks and Fristrup (2010) The costs of chronic noise exposure for terrestrial organisms. Trends in Ecology and Evolution. 25(3): 180-189.

\*\*\*Please print – Additional space is provided on the back.\*\*\*

Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.

\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS.

BI-9

Final  
June 2012

2138 TU

**From:** Sandra Maeser [samtozzi@aol.com]  
**Sent:** Monday, March 12, 2012 11:19 PM  
**To:** AETC/A7P Workflow  
**Subject:** F35 training program

Tucson Az has the perfect climate, great support & the majority of the residents here recognize the importance of having the Guard Base stay in our community. many jobs would be lost & our economy is bad enough without putting a whole base out of work, we need & support the F35's for our city, & our country.Thank You Sandi Maeser Area Supervisor, Style America Hair Salons.

GE-3

Sent from my iPad

2139 TU

**From:** Ed Squires [ed@hydrologicinc.net]  
**Sent:** Tuesday, March 13, 2012 2:39 PM  
**To:** AETC/A7P Workflow  
**Subject:** F-35 Jet Squadron Not a Fit For Boise

**Importance:** High

Hydro Logic, Inc.

1002 W. Franklin St. Boise, ID 83702 (208) 342-8369 Fax: (208) 342-3100 [REDACTED]

Dear Air Force:

I grew up on US air force bases around the world as my dad was SAC Security Police. I went to USAF schools with Phantoms. My in laws live in Waddell, AZ, very near Luke AFB.

The USAF got this one right, the F-35s should go to Luke (or some other deserted area like the middle of [REDACTED] GE-1 Nevada) where people's lives are already fully impacted by that horrendous life-disturbing noise. Despite the [REDACTED] NO-1 "sound of freedom nut-cases", the Boise location is too close to the City, the dangers are high, and the program [REDACTED] SA-7 does not fit well with the community. It is ridiculous to think about this in terms of a few neighborhoods [REDACTED] NO-36 around the airport. You know, if you have ever been stationed around a jet squadron, that this would impact the [REDACTED] PN-1 entire Treasure Valley with a major decline in quality of life. Just because our politicians want "to bring home some bacon" for the state, the Air Force should not select Boise for the F-35s. [REDACTED] GE-4

Thank you for the opportunity to comment.

Ed and Suzanne Squires

[REDACTED]

2140 TU

**From:** Bobby Magee [bmagee@sabinoelectric.com]  
**Sent:** Monday, March 12, 2012 6:56 PM  
**To:** AETC/A7P Workflow  
**Subject:** F-35 proposed site  
**Attachments:** CT\_CF\_Drop\_9.txt

Good after noon, I have lived in both phoenix and Tucson over the last 6 year and would like to say that Tucson is the better location. Davis Mothan is a base that is well received within the Tucson community. I have served as a consultant at Kessler air force base after Katrina so I understand that location is key to a successful operation. Tucson is what you want because they have an excellent infrastructure. Thank you for your time and please consider Tucson as the best location. GE-3

**Bobby Magee**  
Sabino Electric Inc.  
(520) 623-6061 Work  
(480) 517-4989 Work  
bmagee@sabinoelectric.com  
325 S 48th Street  
Suite 108  
Tempe AZ 85281

2141 TU

**From:** Laurence B Harris [Lharris@raytheon.com]  
**Sent:** Tuesday, March 13, 2012 11:42 AM  
**To:** AETC/A7P Workflow  
**Subject:** Support F-35

Southern Arizona has the ideal climate, land, airspace, ranges and facilities needed to train pilots in the F-35. Since 1956, the 162nd Fighter Wing has enjoyed unwavering community support in Tucson. Our Citizen Airmen have built a world premier fighter training unit. This vital mission is of tremendous value to national defense, the state of Arizona and the Southern Arizona community. GE-3

I strongly believe that the F-35 needs to be brought to 162d Fighter Wing in Tucson. The climate is ideal, ranges are close, the land and airspace is available. The unit has the facilities required to support the F-35. It makes sense operationally, monetarily and Tucson supports the Air Force and ANG. GE-3

Thank you,

Larry  
**Laurence B. Harris**  
EKV CCC Planner  
Raytheon Missile Systems  
520-794-5755 work  
Lharris@raytheon.com

2142 TU

**From:** Timothy Kolosick [REDACTED]  
**Sent:** Monday, March 12, 2012 9:19 PM  
**To:** AETC/A7P Workflow  
**Subject:** Support for F-35

Dear David Martin and Kim Fornof,

Please allow me to add my voice in support for the F-35 in Tucson, Arizona. We have the infrastructure, the access to areas for military training, the climate for continued access to the skies, and the support population to work for such an operation. Not only will this project be important to the Tucson area economy but Tucson will be a strong support for the project. Our scientific, academic, and military personnel rival any other city in the country. The University of Arizona provides a Research I environment for research in every area of military science, physics, engineering, optics, and high technology.

GE-3

Those who would come to Tucson to work for aspects of the F-35 program will seek a strong quality of life. Our innovative, entrepreneurial arts community helps provide a quality of life to all who come here to live and work. Access to the outdoors and natural beauty surrounding Tucson add to the sophisticated social and urban atmosphere of the city itself.

Thank you for considering Tucson for this program. The natural, work, and social environments of Tucson make it a perfect match for the F-35 program and its personnel.

Timothy Kolosick, PhD  
Professor Emeritus  
University of Arizona  
Tucson, AZ [REDACTED]  
[REDACTED]

2143 TU

**From:** Creston King [REDACTED]  
**Sent:** Tuesday, March 13, 2012 9:49 AM  
**To:** AETC/A7P Workflow  
**Subject:** Tucson F-35

I am writing to express my full support for the F-35 at Tucson International Airport. I work very close to the airport and have been here 13 years. The coming of the F-35 is welcome. We need the jobs and the added revenue in one of the hardest hit areas of the country in this recession. Tucson is a pilot training paradise. Bring those jets here now!

GE-3

Thank you,

Creston King  
Portfolio Manager  
Davis Advisors

2144 BO

**From:** Pat Brady [isgpat@idahosportinggoods.com]  
**Sent:** Monday, March 12, 2012 10:16 AM  
**To:** AETC/A7P Workflow  
**Subject:** U.S. Air Force Public hearing comment - F-35A Training Base, Boise, ID.

March 12, 2012

David Martin, Air Force Contractor  
 Kim Fornof  
 HQ AETC/A7CPP  
 266 F Street West, Bldg. 901  
 Randolph AFB, TX 78150-4319

I am writing to oppose the proposal to bring The F-35A aircraft to Gowen Field in Boise, Idaho. I am a retired member of the Idaho Air National Guard and a strong supporter of our armed services. I am opposed for the following reasons. ] GE-4

I believe the most important function of our Defense and Air Force is to protect and save our American quality of life and property values. Locating the F-35's at Gowen field will bring extremely loud noise to over 10,000 residents in Boise threatening their lifestyle. The declaration that ] NO-36  
] SO-1  
] NO-1

6958 acres on the vicinity will be declared "unfit for residential use" will devastate homeowners property values. The assessed valuation on most of the taxing districts in the Boise area will be significantly decreased. We will suffer more in an already hurting economy. ] LU-6  
] SO-1

I strongly oppose the potential noise impact on our community, and it is the responsibility of the Air Force to avoid disrupting our lifestyles and diminishing our property values by keeping the F-35's out of Gowen Field. I am sure there are better locations to locate the F-35's that would not destroy American citizens way of life and property values that they've worked a lifetime to secure. Please strongly consider more appropriate locations for the aircraft. ] NO-36  
] SO-1  
] GE-1

Pat Brady  
 President, Hillcrest Lane Homeowners Assn.  
 Boise, Idaho

2145 TU

**From:** Richards, Steve [steve.richards@honeywell.com]  
**Sent:** Tuesday, March 13, 2012 10:38 AM  
**To:** AETC/A7P Workflow

Sir,

I support the F-35A training center in Tucson. ] GE-3

**Steve Richards**

Honeywell Aerospace (Tucson)   
 Supplier Quality Engineer II  
 Phone (520) 469-5605  
 Fax (520) 469-5015  
[✉ <mailto:steve.richards@Honeywell.com>](mailto:steve.richards@Honeywell.com)

Steve Richards





2147 TU

Comments on the F-35A Training Basing EIS

Name: Ann M. Becker  
 Organization: Gates Pass Area Neighborhood Association (GPANA), Tucson AZ  
 Address: c/o 5300 W. Camino del Desierto  
 City, State, Zip: Tucson, AZ 85745

Comments:

The Gates Pass neighborhood lies on the northwest landing approach to Tucson International Airport for both military and commercial aircraft. We, the elected Board of GPANA, are concerned about the increase in noise pollution posed by the F-35a descending over our neighborhood and would like this specifically addressed in the EIS. We have not found that our concerns were addressed in the F-35a Draft EIS although we submitted comments in 2010 in advance of its preparation.

NO-1  
 NP-3

Military aircraft (F-16) already cause greater noise than commercial flights in the neighborhood. Shortly after military jets crest the Tucson Mountains and directly over our neighborhood, they invariably emit a noise burst resulting from a thrust maneuver; the noise bursts significantly exceed normal conversation levels. This is not the case with commercial aircraft. F-16s are usually seen flying in pairs and often several pairs closely follow each other, worsening the situation.

NO-8  
 NO-90

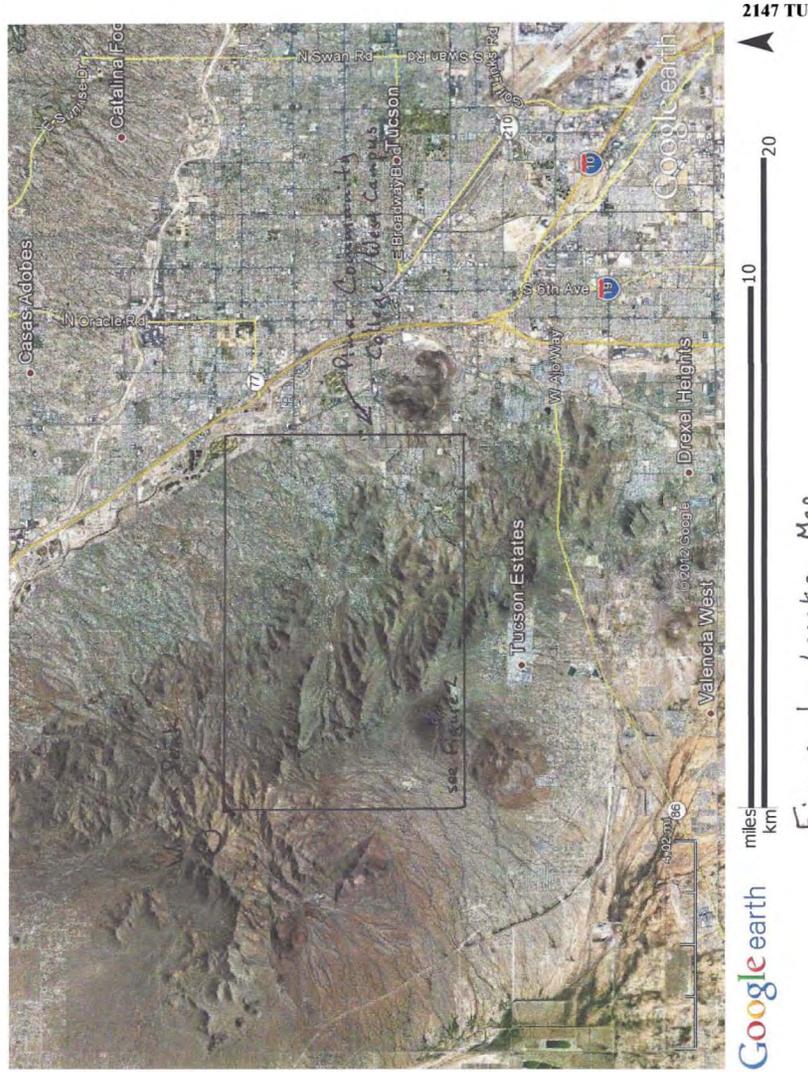
At the recent F-35a public meetings in Tucson, no one representing the Air National Guard could clarify precisely why the thrust maneuver by the F-16 is necessary nor whether it would be necessary for the F-35a. (One local Air National Guard pilot had personally heard the noise bursts while hiking in our area. The representative of SAIC reported that he had heard the same complaint regarding noise bursts, from golfers on the Luke AFB course.) We would like the (likely) increase in noise level by the F-35a quantified in the EIS.

Many of the homes represented by the GPANA lie in an elongated topographic bowl (Figures 1 2, and 3). Homes vary in elevation from about 2500' to about 3800'. The surrounding hillsides and mountain sides are bare rock. The floor of the bowl is primarily bare rock covered by at most a few inches of crushed rock; there is no fine-grained soil. Vegetative cover is typical of the southern Arizona desert, i.e. a mix of cacti, some shrub brush, and few trees. These characteristics are not typical of the city of Tucson.

NO-38

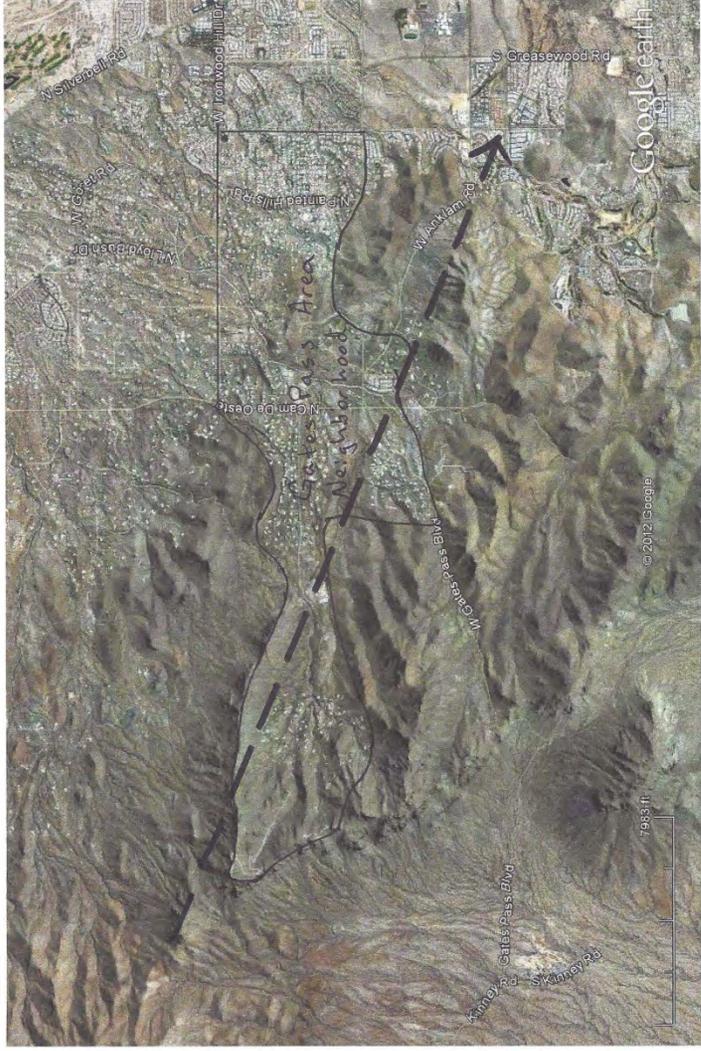
We believe that the EIS will be incomplete if noise related to these descent-related thrust maneuvers is not addressed. It should discuss whether the same maneuvers will be required by the F-35a. It should quantify both the existing noise burst, for comparison purposes, as well as the increase posed by the F-35a. We would like acoustic modeling studies performed for these maneuvers, similar to those presented in the Draft EIS at takeoff/landing sites. Finally, we believe that addressing our requests for this information is appropriate for the level of effort required for a Final EIS.

NO-90

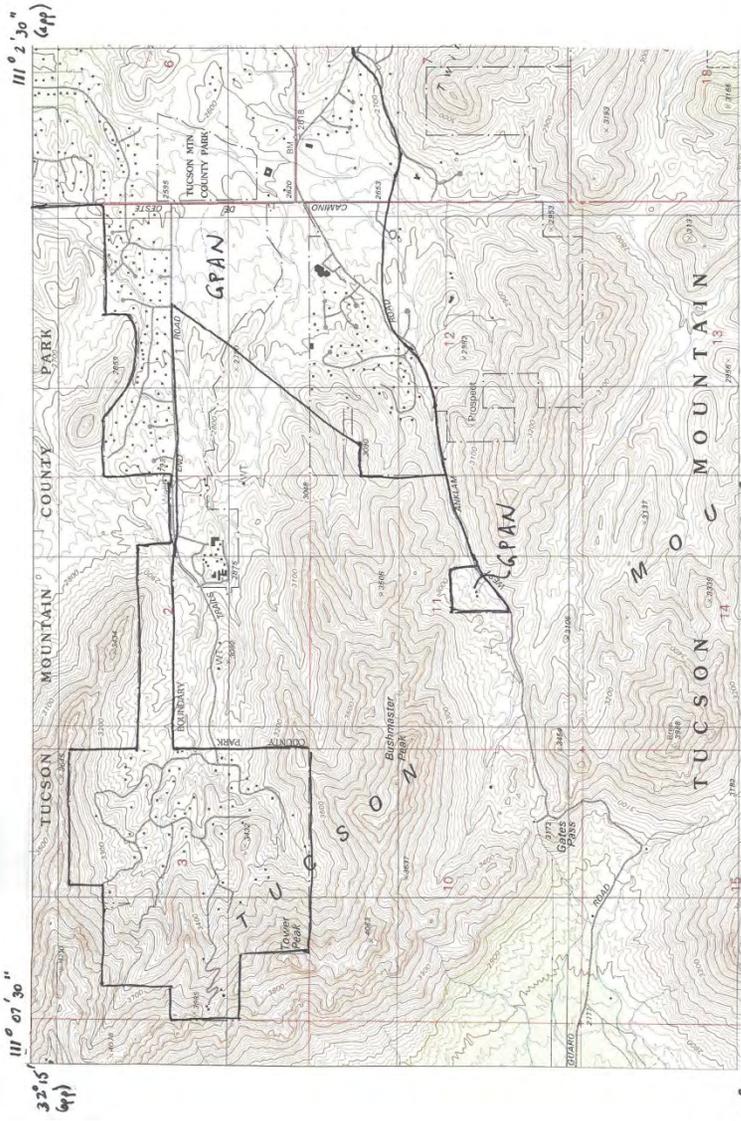


2147 TU

Figure 1 - Location Map



2147 TU  
 Figure 2 - Gates Pass Area Neighborhood and F-16 Landing Approach (Approx)



2147 TU  
 Figure 3 - Topography of Neighborhood Most Affected (152511) (ppt)

2148 TU

**From:** Kenneth R Lyle [rl@raytheon.com]  
**Sent:** Monday, March 12, 2012 7:10 PM  
**To:** AETC/A7P Workflow  
**Subject:** My support for the F-35's

I'm a native Tucsonan and have grown up hearing military jets flying over the Old Pueblo. Just want to know that, as many have said before, that sound means freedom to my wife and me and you have our full support in bringing the training to Tucson. My wife and I both work at Raytheon and we assume a number of our products will be used on the F-35. I would think that the close proximity of DM and the technical staff in Tucson could be a plus in expediting Raytheon weapons system feedback and problem identification.

GE-3

Thank you, Randy

Kenneth "Randy" Lyle  
Materials and Process Engineer  
Raytheon Company

520.794.7025 office  
520.794.9192 fax  
520.489.3651 pager

5204893651@myairmail.com text pager  
rl@raytheon.com email

2149 BO

**From:** Brina [HVR@safelink.net]  
**Sent:** Wednesday, March 14, 2012 2:03 PM  
**To:** AETC/A7P Workflow  
**Subject:** Opposing F-35A

Just want to get on record that Hidden Valley Ranch, Horse Boarding and Paint Breeding, is against bringing F35A fighter jets to Boise. GE-4

We believe they should be integrated with the Mountain Home AF Base. GE-12

Our business is in the fly zone and the noise would be horrible for our business and our clientele. SO-18/BI-1

Sincerely,  
Sabrina & Robert Amidon  
Hidden Valley Ranch LLC  
Boise ID



Maricopa County  
Air Quality Department

2150 LU

Office of the Director  
William Wiley  
1001 North Central Avenue  
Suite #500  
Phoenix, Arizona 85004  
602-506-6443 – desk  
602-372-6440 – fax

March 8, 2012

David Martin, Air Force Contractor and Kim Fornof  
HG AETC/A7CPP  
266 F Street west, Bldg. 901  
Randolph AFB, TX 78150-4319

Re: F-35A Training Basing Environmental Impact Statement

Dear Mr. Martin and Ms. Fornof:

The Maricopa County Air Quality Department appreciates the opportunity to comment on the January 2012 F-35A Training Basing Draft Environmental Impact Statement (EIS).

Based on the air quality analysis of proposed F-35A operations in the EIS, each basing alternative would reduce emissions of air pollutants resulting from the replacement of the existing F-16 operations. In addition, the temporary construction emissions associated with the basing of the F-35A operations fall below conformity or threshold measures through the implementation of best management practices and mitigation measures. As this project reduces emissions from ongoing operations, it would improve air quality for residents and visitors to Maricopa County.

AQ-17

The department would like to take this opportunity to clarify several key factors regarding air quality within Maricopa County.

Construction and Unpaved Surfaces: On pages LU-64-65, the EIS indicates that the projected construction activities would result in combustion emissions from equipment and fugitive dust emissions from the operations on unpaved surfaces. Since any ground disturbance has the potential to contribute to dust emissions, there are specific operational procedures stated in Maricopa County Air Quality Rule 310 that must be in place during normal construction activities<sup>1</sup>. Chapter 2, Section 2.8 of the EIS provides a comprehensive list of mitigation measures that avoid or minimize air quality impacts through implementation. Measures such as sequencing construction to limit soil exposure and re-routing traffic away from congested streets or sensitive receptor areas have proven to be very effective in dust mitigation efforts.

AQ-15

<sup>1</sup> Additional requirements exist for high pollution advisory (HPA) days.

Protecting our most vital, natural resource; air.  
[www.maricopa.gov/air](http://www.maricopa.gov/air)

2150 LU

Air Force Contractor, D. Martin/K. Fornof  
March 8, 2012  
Page 2 of 2

Construction/Asbestos Removal: We would like to clarify a statement made in this section. On page LU-207, the EIS states that Maricopa County requires inspection for the presence of asbestos containing material (ACM) in any building on Luke AFB that is going to be demolished within 12 months of the start of demolition activities. If ACMs are found to be present, Maricopa County must be notified and the ACMs must be removed prior to demolition.

AQ-16

Federal asbestos regulation 40 CFR Part 61 Subpart M and the department's Rule 370 require an inspection performed by an AHERA certified building inspector within 12 months of start of demolition activities and notification for any demolition project whether RACM is present or not. In addition, a separate notification for any renovation activities to remove RACM prior to demolition is also required and may be submitted separately or combined with the demolition notification<sup>2</sup>.

Thank you for this opportunity to comment on the proposal. Based on our analysis, we believe the proposed transition from F-16 operations to F-35A will benefit air quality in Maricopa County.

AQ-17

Sincerely

William D. Wiley, P.E.  
Director

Cc: Jo Crumbaker

<sup>2</sup> Specific requirements for any demolition or renovation activity in Maricopa County are identified in the Maricopa County Air Quality Rule 370, Section 301.8.

March 14, 2012 2151 TU

Dear Sir,

I am writing this note to express the opinion of the Rincon group of the Sierra Club based in Tucson to convey our opposition to basing the F-35 here. GE-4

The F-35 is extremely loud: twice as loud on takeoff as the F-16C and four times as loud on landing. The noise contour map presented in the Draft EIS shows that the area affected by severe noise is up to 6 times as large as the current baseline area. NO-1

By the admission of the Air Force, "The F-35 aircraft scenarios would present a disproportionately high and adverse impact on low income populations (Executive summary, p.81) EJ-4

And it would have an adverse impact on a large swath of the central city, including many of Tucson's historic central neighborhoods, undermining both Tucson's heritage and its potential as a future center for high-tech industries, including the biotech industries that the U of A, BIO5, TREO, and the City are hoping to lure into the UA's Bio Park facility (at 36th st and Kino Parkway). CU-2  
SO-18

The noise produced by the F-35 would interfere with teaching and learning, including at the UA. It would be damaging to Tucson's important tourism industry. It would have negative health impacts, particularly on younger people, causing hearing loss and learning disabilities. Liveability and property values will be reduced. EJ-2  
SO-7  
NO-6  
SO-1

By the AF's own admission, "Under Secenario T3, the projected annual military airfield operations would exceed the maximum number allowed as per agreement with the Tucson Airport Authority." (Executive Summry p. 71) AM-10

There is only one way for the public to make informed comments. We need to have fly-overs of the city by F-35's. GE-2

Fair impartial noise measurements must be made under realistic conditions: during cruising, takeoff and landing, as well as running touch and go's. The aircraft should carry the normal fuel loads and operate at their normal altitude, speed, and power settings for military operations. NO-7

In summary we request that the f-35s not be based in Tucson. GE-4

Carl Kanun  
 Rincon group Sierra club  
 7496 n Camino Sin Vacas  
 Tucson AZ 85718

2152 LU

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**From:** Jody Schmit [jodyschmit@cox.net]  
**Sent:** Wednesday, March 14, 2012 7:05 PM  
**To:** AETC/A7P Workflow  
**Subject:** Luke AFB EIS Jan 2012 - PVP5 HOA Public Comment

March 12, 2012

Mr. David Martin HQ AETC/A7CPP  
 266 F Street West, Building 901  
 Randolph AFB, TX 78150-4319  
[Aetca7cp.inbox@us.af.mil](mailto:Aetca7cp.inbox@us.af.mil)

Ref: Luke Air Force Base – Environmental Impact Statement (EIS) January 2012

Dear Mr. Martin,

The Palm Valley Phase 5 Homeowners Association (PVP5 HOA) would like to take this opportunity to voice our support for Luke AFB as one the two USAF Bases for the F-35 Joint Strike Fighter (JSF). GE-3

We have reviewed the F-35A Training Basing Environmental Impact Statement Draft Executive Summary which concludes the Air Force's Preferred Alternative is Luke AFB with 72 F-35A training aircraft, known as Scenario L3. Additionally we have reviewed the two Luke AFB Sections, the Scenario L3 map on page LU-25 and LU-131, and the various Tables including the LU 3.2–3. Noise Levels at Representative Noise-Sensitive Locations, and other materials at the F-35A environmental study web site <http://www.f35atrainingeis.com/EisDocument.html>. We noted from the documentation, our neighborhood borders the 85 dB (black) line from Location 5 to Location 8 (see the attached maps from the Luke Section). This would be from West to East at Sarival Ave to 150<sup>th</sup> Ave and then from South to North along Indian School Rd to just South of Camelback Road. Furthermore, we understand our neighborhood is Residential Area No. 3 (Location No. 5) and we can expect noise levels at 65 dB DNL as the most Western point to 51 dB DNL to the East.

We enjoy a suburban life style and a nice quality of life as does most of Goodyear. We want to ensure our neighborhood is maintained at the noise level we all signed up to live with when we bought our homes in Palm Valley Phase 5. Although the planned noise levels range from 65 dB to 51 dB, we do want to ensure our environment is not impacted with the introduction of the F-35A. If this happens, we cordially request potential noise mitigation with the latest sound mitigation technologies and methodologies, which may include: NO-17

- Sound Proof Window over a dual pane window
- Home insulation cellulose fiber (walls and attic)
- Vents: Baffle roof, attic and chimney treatment

As an HOA, we are charged with maintaining the expected quality of life in the neighborhood. We consider Luke AFB an important part of our community and wholeheartedly support our United States Air Force and the decision to base the F-35A at Luke AFB. On March 6, 2012, the Board of Directors for PVP5, representing a community of 1,463 homeowners, voted to submit testimony in support of the preferred alternative for Luke Air Force Base in GE-3

**Final**  
**June 2012**

2152 LU

Scenario L3 and request that noise mitigation methods be considered for the homeowners in the Palm Valley Phase 5 community. NO-17

Sincerely,

Jody Schmit, President  
Palm Valley Phase 5 Community Association, Goodyear, AZ 85395

2153 TU

**From:** Debbie Heslop [dheslop@volkco.com]  
**Sent:** Monday, March 12, 2012 7:33 PM  
**To:** AETC/A7P Workflow  
**Subject:** In support of F-35A

Hi,  
I think it would be wonderful to have the Air Force base the F-35A in Tucson. Such a move would add to our local economy and would help put Tucson on the map for other such military or civilian employment centers. And they are exciting to watch! GE-3

Debbie Heslop, CCIM  
Associate Broker  
Volk Company  
2730 E Broadway, Ste 200  
Tucson, AZ 85716  
P: 520.326.3200  
F: 520.327.7906  
E: [dheslop@volkco.com](mailto:dheslop@volkco.com)



2154 LU

March 14, 2012

As President and CEO of the Greater Phoenix Economic Council, I would like to affirm my support for the basing of the F-35A Pilot Training Center at Luke Air Force Base in Glendale, Arizona. Since the 1940s, Luke Air Force Base and its mission have been an integral part of life, economy and proud history of the region.

In leading the region's economic development organization, I intimately understand the keystone value of Luke AFB as a critical institution in strengthening economic growth, stimulating business expansion and providing quality jobs. The entire metropolitan is buoyed by the robust military and government presence that accompanies this performing asset, which delivers more than \$2 billion in annual economic impact to the state.

GPEC is an active champion of Luke AFB, and we continue to promote the base nationally and internationally as a valuable and indispensable economic asset to the region and state. We have led and participated in several efforts to support the long-term viability of Luke AFB and will continue to do so.

The proven record and commitment of the leadership at Luke AFB will fulfill the Air Force's vision of the F-35 to be the primary strike fighter, to the reality of a premier, unparalleled training center of excellence. I am confident their stewardship of this program will serve the Air Force and Armed Services well.

I respectfully request your support in ensuring the F-35A PTC is based at Luke AFB.

Sincerely,

Barry Broome  
President and CEO

JON KYL  
ARIZONA  
730 HARY SENATE OFFICE BUILDING  
(202) 224-4521

COMMITTEE ON FINANCE  
COMMITTEE ON THE JUDICIARY  
REPUBLICAN WHIP

United States Senate  
WASHINGTON, DC 20510-0304

March 13, 2012

2155 LU

STATE OFFICE:  
2200 EAST CAMELBACK ROAD  
SUITE 729  
PHOENIX, AZ 85016  
(602) 840-1891  
6840 NORTH ORACLE ROAD  
SUITE 150  
TUCSON, AZ 85704  
(520) 576-8633

Mr. David Martin and Ms. Kim Fornoff  
HQ AETC/A7CPP  
266 F Street West, Building 901  
Randolph Air Force Base, Texas 78150

Mr. Martin and Ms. Fornoff:

I recently reviewed the Air Force's Draft Environmental Impact Statement (EIS) that concerns the basing of the F-35A training aircraft; as you know, it makes a strong case in favor of designating Luke Air Force Base (AFB) as the "preferred alternative" for the active duty training mission. I would like to share some additional factors below – factors beyond the technical scope of the Air Force's review – that reaffirm the report's clear conclusion; Arizona is the ideal location for training fighter pilots.

*Climate*

As you know, Arizona's weather and landscape present optimal conditions for the training of fighter pilots. The state's warm temperatures and reliable sunshine offer excellent conditions for aviators, and the state serves as a winter haven for pilots training at northern U.S. bases affected by inclement weather. Moreover, Arizona's terrain closely reflects the battlefield environment pilots are likely to face when deployed.

*Facilities*

Luke AFB has the capability to both support the entire training mission and centralize the Air Force's F-35 training. Indeed, at the height of F-16 training, Luke AFB and its exemplary auxiliary fields supported a full 10 squadrons and nearly 200 aircraft (this is especially significant given that the EIS only considered a maximum beddown of 144 aircraft). Most important, however, is the ability of pilots to exercise at our nation's premier weapons complex – the 1.8 million-acre Barry M. Goldwater Range. Its nine air-to-ground and two air-to-air ranges allow for more than 50 aircrews and aircraft to train simultaneously, and it annually hosts more than 50,000 training operations that include every branch of the military, as well as active duty, reserve, and National Guard personnel.

*Community and Managed Growth*

Arizona citizens – as well as state and local officials at all levels – are strongly supportive of our state's partnership with the Air Force and, in particular, of bringing the F-35 to

GE-3

GE-3

Final  
June 2012

2155 LU

Luke AFB. The recent outpouring of support from citizens for the F-35 reflects this, and state officials have continuously coordinated with military installations to establish noise contours, accident zones, and necessary land-use requirements since 1978. The community’s proactive steps to manage growth around Luke AFB and protect it from encroachment are indicative of this overwhelming local support. Even the EIS recognized some of these measures, and its analysis clearly shows that the noise contour lines – drawn based on the 1988 Joint Land Use Study (JLUS), and codified by the state – protect an area far in excess of the space required for the maximum deployment of 144 F-35s.

The pro-active measures taken provide an expansive buffer for local citizens, thus allowing effective assimilation of F-35A operations by the base and surrounding communities. These policies also ensure that land development will not conflict with the co-dependent missions at Luke AFB, the auxiliary fields, or the Barry M. Goldwater Range. Protection of this network of facilities sets Luke AFB apart from most military bases, and provides adequate protections – within the parameters of the National Environmental Protection Act (NEPA) – that would support a Record of Decision validating the U.S. Air Force’s selection of Luke AFB as the “preferred alternative” for its F-35 active duty training mission. I applaud the state for its hard work and forethought in establishing such measures.

The Air Force’s investment in personnel and resources in Arizona has resulted in substantial social and economic benefits. For instance, base personnel contribute greatly as volunteers in their communities, many Arizonans have ties to the military, and the state’s strong aerospace and defense presence has fostered vibrant academic and private development. In return, Arizona’s communities have demonstrated their commitment to improving quality-of-life for service members, caring for veterans, and protecting military installations.

*Track Record*

Capitalizing on these distinct advantages, Arizona and the Air Force have worked for decades to provide our nation with well-trained fighter pilots. The 56<sup>th</sup> Fighter Wing stationed at Luke AFB and the 162<sup>nd</sup> Fighter Wing stationed at Tucson Air Guard Station have together produced tens of thousands of pilots and thousands of crew chiefs. Luke alone trains half of the Air Force’s fighter pilots and 90 percent of its F-16 pilots. Arizona’s pilot training mission has also produced well trained-pilots for our international allies and partners. Bringing the F-35 to Arizona – just as the Air Force begins to retire the F-16s currently in use there –would ensure the continuation of this relationship for the next generation of aircraft and pilots.

In short, Arizona’s ideal climate, unparalleled facilities, strong community support, and unmatched record of success make it an ideal home for the F-35A training mission. Accordingly,

GE-3

2155 LU

I fully support the Air Force’s favorable consideration of these factors and a final Record of Decision in favor of Luke Air Force Base’s candidacy later this year.

GE-3

Sincerely,



JON KYL  
United States Senator

2156 TU

**From:** Judy Rich [Judy.Rich@tmcaz.com]  
**Sent:** Tuesday, March 13, 2012 6:58 PM  
**To:** AETC/A7P Workflow  
**Subject:** Support forthe F-35

As the CEO of a Tucson hospital and an employer of 3300 staff I support the F-35 assignment to Tucson. Our great men and women of the 162<sup>nd</sup> do so much for our community and our nation! I strongly support this work! } GE-3

Judith Rich  
President and CEO  
TMC HealthCare  
5301 E. Grant Rd.  
Tucson, AZ 85712  
(520) 324-3578

2157 TU

**From:** [REDACTED]  
**Sent:** Wednesday, March 14, 2012 12:43 AM  
**To:** AETC/A7P Workflow  
**Subject:** F-35 to Tucson

I support the F-35 to Tucson for numerous reasons. } GE-3  
The F-35 if brought to Tucson will improve the economy of the city/state of Arizona  
The 162nd TFW has one of the best safety records of any AF unit.  
The experience level of the folks working there is better than any AF unit. NO constant turnover of personnel.  
Weather is near perfect year round.  
Near Raytheon & can support them in various weapons testing.  
Near the Barry Goldwater bombing range. Can be there in minutes from take off.  
More visitors to Tucson from the foreign community.  
Lower emissions with the F-35 will result in cleaner air locally.  
Increase in number of people employed at the Air Guard & increase in support of the local employers with increased hiring for companies for local business.  
I believe if the F-35 is brought to Tucson it will be good for all concerned locally.  
BRING THE F-35'S TO TUCSON !!!!!!!!!!!

Monroe C Smith  
138 W. Veterans Blvd  
Tucson, Arizona, 85713  
Owner of H & M Automotive.



2158 TU

David Martin, Air Force Contractor  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX 78150-4319  
Via Email: [aetc.a7cp.inbox@us.af.mil](mailto:aetc.a7cp.inbox@us.af.mil)

March 14, 2012

**Subject: F-35A Training Basing Draft EIS**

Dear Mr. Martin:

Thank you for the opportunity to review the draft EIS for the F-35A Training Basing.

The Tucson Airport Authority supports all forms of aviation and is committed to providing world-class aviation facilities that best serve the demands of the flying public; including air carrier service, general aviation, recreational and specialty needs, aeronautical industrial development and military functions.

Our review of the Draft EIS is limited to technical analysis of TIA facilities and their bearing on the decision-making process. Within this context, we offer the following comment:

*All of the DEIS's airfield exhibits seem to show the 11L landing threshold at TW-A1; the landing threshold is generally located at TW-A4. The location of the threshold has obvious bearing on your technical (ie, project costs) and environmental (ie, sound exposure) analysis and conclusions.* **NO-83**

Again, thank you for the opportunity to review the draft EIS. Please contact me if you would like to discuss TAA's review comment.

Respectfully,

Jordan D. Feld, CM, AICP  
Director of Planning

cc File  
J.Merrick

2159 HO

**From:** Jeff Duncan [songdog@pvtnetworks.net]  
**Sent:** Monday, March 12, 2012 12:08 PM  
**To:** hgreczmiel@ceq.eop.gov  
**Cc:** AETC/A7P Workflow  
**Subject:** Emailing: CEQ letter Ellen  
**Attachments:** CEQ letter Ellen.doc

Mr Greczmiel,

Ellen Kazor here...from Weed, NM.

Thank you for taking my call on Friday concerning Air Force's the Draft F-35A Training Basing Environmental Impact Statement .

As per your direction, I am attaching a letter to you concerning the what the Weed, Mayhill, Pinon, and Sacramento NM are currently experiencing with the NEPA process.

While Mr Tom Ward's name appears at the bottom, please know that this letter was written in conjunction with a core group of concerned citizens.

Since this group does not have a formal name , Mr. Ward is not only representing the Weed Community Association but also all concerned citizens of Weed, Mayhill, Pinon and Sacramento NM.

Also, as you requested, some of our citizens have already e mailed you copies of the letters they have submitted to Mr. David Martin and Kim Fornof, Contractors of the Air Force. They are developing the F-35A.

Thank you for reading our attached letter and thank you your time and and concern.

If you have any additional suggestions that we might follow to insure that our concerns will be properly addressed, please contact me. I will forward you recommendations on to our communities.

Thank you again.

Sincerely,

Ellen Kazor

Final  
June 2012

**2159 HO**

March 7, 2012

Horst Greczmiel, Director for NEPA Oversight  
 Council on Environmental Quality  
 722 Jackson Place, NW  
 Washington, DC 20503

RE: Draft F35Training Basing Environmental Impact Statement (EIS)- Air Force

Mr. Greczmiel,

This letter is written concerning the Draft F-35A Training Basing Environmental Impact Statement.

Currently the Draft EIS is being reviewed by the public for comment.

We are contacting your office at this point in time because of serious concerns we have with the NEPA process to date as it applies to our communities and the resulting Draft EIS. We would like this letter entered in to the public record. NP-8

While there are very serious concerns and questions concerning the reliability and validity of the entire Draft EIS (which are addressed in numerous letters from our community and should be answered in the Final EIS as per NEPA requirements), the concerns we want to express to your agency are with what our communities are experiencing with the NEPA process.

The Weed, Sacramento, Pinon and Mayhill NM are small mountain communities situated under Military Training Routes (MTR's) of Holloman AFB.

While the idea of mountain communities in New Mexico may conjure up romantic images of Sante Fe and Taos, that is not the case in here. The majority of our citizens are elderly, retired residents who are on low or fixed income. Many are medically compromised. Most are just "getting by". There are few luxuries.

As per the CEQ's publication "A Citizen's Guide to the NEPA ; Having Your Concerns Heard" it was recommended that your office be contacted as early as possible "...if involvement isn't going well".

Based upon this recommendation we are submitting the following concerns.

First and foremost : Public involvement is a requirement of the NEPA process. During the scoping period numerous members from Weed, Mayhill, Sacramento, and Pinon expressed oral and written concerns about the specific environmental impacts the F-35A would have flying over our homes, our properties and the National Forest since we are located under MTR's. We asked that these concerns be assessed and addressed in the Draft EIS. Our concerns were not addressed with regards to the F-35A. No assessment appears in the Draft EIS of the environmental impacts that the F-35A would have on our communities. We were ignored. NP-3

**2159 HO**

Since the Draft EIS does not include an assessment of the environmental impacts that the F-35 would have on the Sacramento Mountains communities (to include Weed, Mayhill, Pinon and Sacramento), then potential violations of the National Environmental Policy Act have not been considered with regards to our communities. DO-25

Second: Our attempt to work with the lead agency in requesting an extension of time to review the Draft EIS has proven unsuccessful.

Our extension request was generated due to the length of the Draft EIS (which is over 1000 pages), the vast amount of technical information contained in those 1000 plus pages and overwhelming amount of data that had to be studied in detail, to the best of our ability. We feel forty five days is not a reasonable time for common citizens to study and digest a document of this magnitude. NP-12

Our request was denied for "lack of a compelling reason". We have resubmitted a second request for an extension and are waiting for a reply. NP-38

Third: We believe that our communities will not receive a fair and objective assessment regarding the environmental impacts the F-35 will have on our communities. This is based on our past and current history with the Air Force.

The Environmental Impact Statement that was generated for the basing of the F22 out of Holloman AFB has proven to be wrong. The F-22's are having VERY significant negative, environmental impacts on the health and safety of our communities. We are beginning to see negative impacts on our economy.

The F-22's flying over populated rural areas, creating earth shattering sonic and focused booms is not consistent with NEPA Law. NEPA was designed to "assure for ALL Americans safe, healthful, productive and aesthetically and culturally pleasing surroundings." NP-39

We have followed Air Force protocol on reporting problems and have had community meetings with the Holloman AFB personnel to discuss these issues. Our concerns and questions have been ignored.

Therefore we feel that since we have been and are currently raising questions and demanding answers from Holloman regarding our health, safety and economic interests, we fear that any assessment conducted by the Air Force or any of it's contractors concerning the F-35 and the MTR's under which we are located would be prejudicial.

Finally: We recognize that the Draft EIS states that Luke AFB is the preferred alternative. However, it is stated in the Draft EIS, that the Final EIS will serve as the EIS for any future basings at any of the other alternatives listed, including Holloman AFB, NM. DO-2

Therefore, any proposed actions set forth in Draft EIS and the Final EIS would set a precedent that collectively could result in significant negative environmental impacts for citizens of Weed, Mayhill, Sacramento and Pinon NM.

2159 HO

Our communities and citizens do not have the financial resources required for the hiring of a lawyer, an administrative appeals or any judicial review. We are depending on a fair, valid, reliable and objective EIS . We hope that your agency can insure that this occurs.

We thank you for you consideration of our concerns.

Sincerely,

*Tom Ward*  
Tom Ward, President  
Weed Community Association

cc: David Martin and Kim Fornof Contractors\_for the Air Force \_\_\_  
Commander Col. David Krumm, Holloman AFB

2160 TU

**From:** Akins, Charley [charley.akers@honeywell.com]  
**Sent:** Tuesday, March 13, 2012 2:04 PM  
**To:** AETC/A7P Workflow  
**Subject:** F-35 Training Mission

Dear Mr. Martin and Ms. Fornof,

I am writing to express my support of the F-35 training mission at Tucson International Airport. The relationship between the community and our Air National Guard has been solid for many years and should continue as new technology is developed. You may use my comments as you see fit.

GE-3

Best regards,

Charley Akins

  
**Aerospace Tucson**

*Charley Akins*  
Product Engineer

☎ (520) 469-4068 (phone)  
☎ (520) 237-3234 (mobile)  
☎ (520) 469-5015 (fax)  
[charley.akers@honeywell.com](mailto:charley.akers@honeywell.com)

2161 TU

**From:** Glock, Robert D - (glock) [glock@email.arizona.edu]  
**Sent:** Tuesday, March 13, 2012 11:17 AM  
**To:** AETC/A7P Workflow  
**Subject:** F-35 YES

Greetings from aviation friendly Arizona. We have a long history of outstanding aviation activity in the Tucson area. This community minus a few distracters has been a key promoter of military and aviation. The environment is well known. Please consider this a strong yes for a continued strong military and airpower focus in this area. I fly light planes and will welcome the F-35 and the sounds of freedom in our airspace. ] GE-3

Bob Glock

Robert D Glock DVM PhD  
Arizona Veterinary Diagnostic Laboratory  
University of Arizona  
520-621-2356 Ext 13

2162 TU

**From:** Cliff Lawton [clawt@yahoo.com]  
**Sent:** Tuesday, March 13, 2012 3:38 AM  
**To:** AETC/A7P Workflow  
**Cc:** Sandi Eghtesadi  
**Subject:** F-35

Dear Air Force-  
We DO enthusiastically support the F-35 coming to Tucson! We GREATLY appreciate and support the Air Force presence here, and love the "sound of freedom" in our skies! Please do NOT listen to any naysayers. We in this community WANT and support this vital part of our defensive triad! We in the business and church community look forward to working with you! ] GE-3

Sincerely,  
Cliff Lawton  
Agent, Farmers insurance  
Pastor, Temple Baptist Church, Tucson  
520-250-9201

2163 TU

From: Carol Boss [CBoss@HFHBoise.org]
Sent: Wednesday, March 14, 2012 1:40 PM
To: AETC/A7P Workflow
Subject: F-35A program in Boise, ID

The Draft F-35 Environmental Impact Study raises serious concerns for me, a resident of Boise. While I do not live in an area that is within the "Not Suitable for Residential Use area, I am concerned about the more than 10,000 residents of my community who will find their homes reclassified as such. I am also concerned by the number of schools and day care centers; parks, businesses that will fail or have to relocate because of the noise. Out valley experiences serious inversions that make it difficult to impossible for residents with respiratory illness/concerns to go outside during the inversions. I am very concerned about the added air pollution the F-35A program would bring to the Treasure Valley. The Air Force has identified other, more suitable locations for the proposed F-35A Training Base.

In summary, I strongly oppose the possibility of an F-35-A Training Base in Boise, Idaho because of the impact it will have on the quality of life in the Treasure Valley.

Carol Boss
Office Administrator, Boise Valley Habitat for Humanity
PO Box 6571, Boise, ID 83707
office phone: (208) 331-2916 · fax: (208) 344-1276
cboss@hfhboise.org · hfhboise.org | What will you build?

2164 BO

From: Katie File [katie@westernwatersheds.org]
Sent: Wednesday, March 14, 2012 4:27 PM
To: AETC/A7P Workflow
Subject: F-35A Training Basing EIS

March 13, 2012

David Martin, Air Force Contractor, and Kim Fornoff
HQ AETC/A7CPP
266 F Street West, Bldg. 901
Randolph AFB, TX 78150-4319
Fax: 210-652-5649
Email: aetc.a7cp.inbox@us.af.mil

Dear U.S. Air Force and IDANG,

Here are comments of Western Watersheds Project on the potential use and basing of the F-35A and its training activities across an extensive area of public lands in the fragile sagebrush biome. The DEIS is the United States Air Force F-35A Training Basing Environmental Impact Statement.

WWP opposes any use of the F-35 in Idaho. We are strongly opposed to basing 72 F-35A aircraft in Boise or Mountain Home. We strongly support the No Action Alternative. The Alternatives presented do not adequately examine the full spectrum of adverse impacts to the public. The Environmental consequences of the needed construction, personnel changes, and flight operations at the main airfield, auxiliary airfields, military ranges, and in the military airspace are not adequately described and analyzed in the EIS. We are greatly concerned about impacts of overflights and use of the military ranges.

This plane is twice as loud as F-15s and F-16s on takeoff and landing. These planes would take off and land 50 times per day, for a total of 14,000 times per year. The unsuitable lands for human habitation stretch from Maple Grove to Columbia Village. 4 schools, 13 day cares, and two parks are located there. They would use afterburners 1400 times – and fly at night disrupting sleep 1400 times per year, as well.

These planes would fly right by or over the Snake River Birds of Prey NCA which is located very close to Gowen Field. Then they would fly over, and maneuver over – public lands – BLM lands and potentially Forest Service lands as well. We are greatly concerned about adverse impacts to public lands, wildlife and recreational associated with the Juniper Butte and Saylor Creek and other military training ranges – including all components of the training activity.

It is not just the noise that is of great concern. Air pollution, in a valley already suffering from severe air quality problems, would also increase substantially. These planes and their contrails will increase dull gray skies that hold heat in, increase pollutants, and likely increase inversion effects and pollutants trapped in the stagnant valley airshed. This would all be occurring at the same time as Oil and Gas development is projected to unfold in western parts of the airshed. All of this combined, along with the very large quantities of methane and other air pollution being emitted by CAFOs like industrial dairies and beef feed lots that have flooded into Idaho due to lax environmental regulations would be increasing pollutant loads over the whole valley, as well.

**2164 BO**

How will all of this pollution combined affect human health? The health of pets? The health of wildlife? How will it exacerbate the adverse impacts of climate change effects? Won't skies laced with contrails that end up forming clouds hold in heat – and amplify warming effects? AQ-14

This aircraft is horrendously loud. The F-35 will destroy the quality of life for Idaho residents in their homes in Boise and other areas overflown/exposed to this roar, as well as across public lands over which it would fly. Its use in wild lands of southern Idaho and the West will adversely affect a wide range of rare, imperiled and sensitive wildlife species that WWP has worked very hard to conserve and protect. These imperiled species include bighorn sheep, sage-grouse, migratory birds, and other native wildlife. Ground-based training support activities will degrade, alter and adversely impact slickspot peppergrass habitats, as well. More use on road in remote ranges will promote more weeds. These concerns are amplified by the significant public lands livestock grazing degradation that occurs across lands surrounding remote range sites. NO-1  
NO-16  
NO-36  
BI-6  
BI-24

Wildlife across the sagebrush biome already face great threats and stresses in their environment. See Knick et al. (2003), Connelly et al. (2004) Conservation Assessment for Greater Sage-grouse, Kick and Connelly (2009) Sage-grouse Monograph Studies in Avian Biology, U.S. Fish and Wildlife. Service March 2010, Warranted but Precluded Finding for greater sage-grouse. It is increasingly known that sage-grouse and other wildlife are very sensitive to disturbances. Sage-grouse and other wildlife in southern Idaho suffer significant habitat degradation and disturbance from livestock grazing - including degradation of all components of habitats – soils, vegetation, cover, space, and food availability. See USDI BLM Jarbidge AMS (2007). BI-8

The present military overflight noise, sonic booms, use of flares and chaff by F-16s and F-15s and other aircraft in the southern Idaho deserts, northern Nevada and eastern Oregon under the MOAs and MTRs is already greatly excessive. It is hard to even imagine what the sonic and visual Hell that would result from F-35s being added to the mix would be like. NO-8  
NO-1  
BI-5

Recent military training exercises this winter over Boise caused significant discomfort and stress to local residents, disrupted work for people who have home offices, disrupted outdoor walks and hikes, and otherwise greatly lowered the quality of life. In summer, sleep would have been impossible – and these were quieter planes! If these horribly loud F-35s are used anywhere near towns, residents will suffer great stress and the public will suffer increased costs at all levels – including such things as air conditioning bills that skyrocket. People will not even be able to leave their windows open for fresh air, or to take advantage of natural cooling at night. NO-18  
SO-18  
NO-36  
SO-45

When WWP members complained about the recent overflights, there was no response at all from the Air Force – other than justifying its dangerous training activity over a populated center. The loud and disruptive overflights just continued. Information requested by members from the Air Force, after calling to complain, on environmental analysis for training over a densely populated city - have not been provided. The military in the Boise-Mountain Home area is not even able to address public concerns at present. The Mayor's office, despite news articles implicating the Mayor in involvement in this, is denying any knowledge. We are greatly concerned that policies aimed at placating military contractors seeking lucrative federal contracts and others are trumping concern for the health and well-being of area residents. We found it particularly ironic that the city of Boise's Website proclaims Boise is the most livable city – at the same time that the Mayor's Office was evading responding to a flood of citizen complaints about the overflight noise. DO-6  
PN-1

On many occasions while hiking, camping, birdwatching, engaging in photographic pursuits, and seeking solace solitude and enjoyment in wild land areas - the current ear-splitting noise from overflights has marred and disrupted our members use and enjoyment of the public lands. For example, it has forced us to cover my ears, NO-18

2

**2164 BO**

and drive away from sites where we have been trying to enjoy a hike or nature observation. A dull ache persists for hours in one's ears after exposure to the current excessive noise coming from military activity associated with the USAF and IDANG. NO-18

Loud planes suddenly appearing can also produce a "startle" effect that shocks a person's senses, and elicit a fear response. Animals, too, may exhibit a fear response as well to objects suddenly appearing on the horizon. BI-5  
NO-15

Exposure to deafening and noises, startling objects suddenly appearing in the visual field, and skies laced with contrails that create murky white cloudy skies on a clear day are the antithesis of wild land recreational use and enjoyment in the WSAs, Wilderness, unroaded wild lands, remote sagebrush plateaus, of the tri-state region. NO-1  
BI-5  
AQ-1

Native wildlife species subjected to incessant noise face stress, disruption of social behaviors, and likely displacement from important nesting, breeding, brood rearing, kidding, fawning, birthing, summering, wintering and other habitats. Wildlife will suffer increased mortality from being displaced into sub-optimal habitats, or made more subject to predation. These adverse impacts will lead to further losses and declines of species like sage-grouse, over which there is great public concern. BI-6  
BI-8

A full and comprehensive baseline analysis of the condition of habitats and populations of all BLM and Forest Service special status species impacted by the potential F-35 overflights in this tri-state region must be provided. How will this horrendously loud aircraft increase stress, and cause population declines in sage-grouse? What is the current status of all sage-grouse habitats and populations over which this horrifically loud aircraft would fly? Where are all important lek, nesting, brood rearing, and wintering habitats? How will the F-35, on top of all the ongoing noise activity, adversely impact habitats and populations? What is the current baseline of ecological degradation that exists across these sage-grouse habitats – such as degradation from livestock grazing, sage-grouse mortality due to livestock facilities like fences or troughs that promote West Nile virus, and the combined adverse effects of livestock grazing and wildfire, roading, and other disturbances to the public lands? BI-23  
BI-8

Please see Attached WWP comments on the Jarbidge BLM DEIS/DRMP, illustrating the current ecological conditions and plight of wildlife, and wild lands – including the degree and severity of degradation from livestock grazing and synergistically related fires. See also Attached USDI BLM Jarbidge Analysis of the Management Situation (AMS) describing serious habitat ecological concerns and stresses – from weeds, wildlife, livestock facilities like fences, road densities, etc. that sage-grouse, bighorn sheep, antelope, Brewer's sparrow, loggerhead shrike, sage thrasher, and other rare and important species already face. GE-26

Where all active, historic, undetermined leks that will be subject to this noise? What are the current numbers of birds at these leks, and how have these numbers changed over time? What is the current human disturbance Footprint on lands to be overflown? BI-13  
BI-14

A full and comprehensive analysis of the adverse impacts of military training activity, including on animals and humans, must be provided. BI-23

The Air Force Environmental Review is greatly inadequate in its examination of all direct, indirect and cumulative adverse environmental impacts related to this plane and its operations and operational Footprint. NP-1

It is critical to understand the full sonic, visual, air pollution, and ground-based other disturbance associated with ongoing or other foreseeable military activities in this region. CM-6

3

2164 BO

Habitats of California bighorn sheep, sage-grouse, migratory birds and other wildlife that inhabit lands under military airspace in southern Idaho are already greatly stressed

BI-3

Please see Attached WWP comments on the White Elk airspace expansion. Please apply all concerns related to noise, air pollution, visual pollution and startle effects, disruption of recreation and wildlife habitats, etc. in those comments to this current F-35 process.

GE-26

We have heard from members in the North End whose dogs are startled just by the planes taking off at the Boise airport. It is hard to imagine the stress that F-35s would place across the entire town. We believe the estimates of the noise impact zone is far too limited in the analysis.

BI-5

NO-11

Plus, if domestic dogs that are typically exposed to many loud noises in town are spooked by airplane noise, the effects on wildlife in wild land settings, many species of which have far keener hearing, and are sensitive to a larger or different frequency range than humans, will be immense.

BI-5

We are also greatly concerned that this activity will increase the abominable use of white phosphorus, which the military slipped into practice at Saylor Creek under a flimsy EA. The claims in that EA were unsubstantiated. Use of this substance is hazardous to humans, as well as increasing risks of uncontrolled wildfire. A full range of alternatives must be considered here, including activities that reduce the number of flights from ALL military aircraft significantly, and roll back use of remote sites as well as harmful substances like white phosphorus.

DO-39

Please keep us fully informed of all parts of this analysis.

This plane's activities just in Boise would be expected to result in sleep disruption (projected to increase by 33%) and hearing loss for 313 residents. This shows what an abomination this F-35 is, and it simply should not be produced, and should not be flown anywhere.

NO-3

NO-5

It is time for a current, integrated, honest baseline analysis of all military training activities – by both the U. S. and foreign parties, across this region. The piecemeal stack of existing analyses (and proposals in the wings) covering USAF, foreign entity – like Singapore or Saudi Arabia, and IDANG training activities - is greatly inadequate. Full and detailed analysis of all airspaces, training areas, military and other uses, noises, visual disruptions, air pollutants, wildlife habitat disruptions, impacts to wildlife habitats and populations, impacts to recreational uses - all must be fully provided.

CM-6

Sincerely,

Katie Fite  
Western Watersheds Project  
PO Box 2863  
Boise, ID 83701  
208-429-1679

2165 BO

-----Original Message-----

From: Nancy Hernandez [mailto:Nancy\_Hernandez@fd.org]  
Sent: Wednesday, March 14, 2012 12:06 PM  
To: AETC/A7P Workflow  
Subject: F-35A Training Comment

Mr. Martin and Ms. Fornof,

While you have allowed citizens to provide you with their comments on the F-35A training bases, I do hope you are actually taking the comments seriously!

NP-2  
NP-8

(See attached file: Comment Page.pdf)

Nancy Hernandez  
Paralegal  
Federal Defender Services of Idaho  
702 W. Idaho Street, Suite 1000  
Boise, ID 83702  
Direct: (208) 331-5510  
Main: (208) 331-5500  
Fax: (208) 388-1757  
nancy\_hernandez@fd.org

Corresponds to 1966 BO (Individual Letter)

2165 BO

United States Air Force  
Public Hearing Comment Form  
F-35A Training Basing  
Environmental Impact Statement (EIS)



Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways:

- 1) Turn in this form at the comment table before you leave tonight.
- 2) Provide oral comments to the court reporter during the open house session or public hearing.
- 2) Mail, fax or email comments to:  
David Martin, Air Force Contractor, and Kim Fornoff  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX 78150-4319  
Fax: 210-652-5649  
Email: aetca7cp.inbox@us.af.mil

All comments on the Draft EIS must be postmarked or received by March 14, 2012, to ensure they become part of the official record. All comments will be addressed in the Final EIS.

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name: Don and Nancy Feeney

Organization/Affiliation: \_\_\_\_\_

Address: \* \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Comments: As some one who is no going to live in an area that is basically being classified as "Not Suitable for Residential Use" please explain to me how I am going to sell a house that should not be lived in nor is any one going to want to live in it based on all the noise? In addition, with the housing market already being in a slump this will also lower the value of my property even more, thus making even that more difficult to sell the home and putting me in the negative on it, which I can not afford. Is the Air Force going to make that difference up? What are you, the United States Air Force, going to do

\*\*\*Please print - Additional space is provided on the back.\*\*\*

Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.

\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS.

Corresponds to 1966 BO (Individual Letter)

2165 BO

to help the people who live in the flight path of these jets and who's homes you've now reduced to nothing.

Tucson Forward  
P. O. Box 42472  
Tucson, AZ 85733-2472.

Arizona Center for Law  
in the Public Interest  
2205 E. Speedway Blvd.  
Tucson, AZ 85719

March 14, 2012

VIA U.S. MAIL AND ELECTRONIC MAIL

Mr. David Martin, Air Force Contractor  
Ms. Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Building 901  
Randolph Air Force Base, TX 78150-4319

Re: Proposed Pilot Training Center and Basing of F-35A Training Aircraft EIS

Dear Mr. Martin and Ms. Fornof:

This letter represents the response to the solicitation of comments on the draft environmental impact statement (DEIS) for the proposed Pilot Training Center and Basing of F-35A Training Aircraft from Tucson Forward and the Arizona Center for Law in the Public Interest ("Center").

Tucson Forward is a non-profit organization that aims to protect Tucson and its neighborhoods from health damaging noise and safety concerns related to the F-35 Joint Strike Fighter and other military aircraft. Our goal is to foster economic, scientific and technological development of Tucson in a way that supports and promotes a good quality of life for all its citizens. The communities we represent would be affected in a number of ways should the proposed basing of the F-35As and the pilot training center be established in Tucson.

The Center is a nonprofit law firm dedicated to ensuring government accountability and protecting the legal rights of Arizonans. It frequently works with community groups that are concerned about the environmental impacts of proposed government projects or actions, and assists them in navigating the NEPA process.

Both of our organizations believe publication of this DEIS, as demonstrated by the inadequate analyses discussed below, is premature and that the DEIS should be withdrawn and rewritten and published for public review and comment when the design and operations of the F-35A are completed and understood sufficiently. Should the Air Force choose to proceed at this point, at a minimum, it must publish a revised or supplemental DEIS for public review and comment which addresses the many deficiencies outlined below.

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I. The DEIS Is Premature.

We understand that the idea that publication of a DEIS is premature is an unusual argument to make in the context of NEPA. Generally, citizens complain that the process commences too late and indeed the entire thrust of NEPA law is to require analyses at the earliest possible time. However, the earliest possible time by definition exists, "at that stage in the development of an action when an agency subject to the Act has a goal and is actively preparing to make a decision on one or more alternative means of accomplishing that goal and the effects can be meaningfully evaluated." 40 C.F.R. § 1508.23 (emphasis added).

In this unusual scenario, the Air Force admits in the DEIS that this analysis of aircraft types and numbers is "not currently ripe for decisionmaking" (Executive Summary p. 7, DEIS, p. 2-7, emphasis added). This is understandable, given the serious difficulties and delays identified by the Air Force itself and discussed in the November 29, 2011, "F-35 Joint Strike Fighter Concurrency Quick Look Review." That report identified a number of major consequence issues, the combined impact of which "results in a lack of confidence in the design stability" and concluded that, "the current confidence in the design maturity of the F-35 to be lower than one would expect . . ." (Executive Summary, pp. 1-2). The consequences of these deficiencies reverberate throughout the analysis. And at the February 23, 2012, public meeting in Tucson regarding the DEIS, an Air Force representative at the informational session made an important admission. After describing F-16 noise abatement procedures to a group of citizens clustered around a poster, he stated that, "we don't know design of the F35 yet so I don't have a clue how we will handle that" here.

Basic information essential to the analysis of noise and safety and other impacts is not available given that, as the DEIS points out, "information from existing operations is unavailable." (p. 2-18). This lack of empirical data undermines the entire body of analyses. The dramatic changes in noise levels reflected in the errata sheet for the DEIS released on January 20, 2012, further reflects these uncertainties. Further, premature publication of the DEIS, besides resulting in a fundamentally inadequate document, appears unnecessary given the attenuated schedule for decisionmaking.<sup>1</sup> News reports in trade press indicate that, "[t]here is no known date when the F-35 will be cleared for safe flight to train pilots" and that the program is so burdened with problems that friendly governments that had anticipated purchasing aircraft are considering a delay for at least several years. "F-35 Lightning II News – Australia may delay 12 of 14 F-35s in initial order," F-16 net, Jan. 30, 2012, available at [http://www.f16.net/news\\_article4509.html](http://www.f16.net/news_article4509.html). See also, "US F-35 production slowdown may delay foreign orders" Reuters, Feb. 10, 2012, available at <http://www.reuters.com/article/2012/02/11/lockheed-fighter-idUSL2E8D91LC20120211>.

In short, rather than continuing to essentially guess as to the final configuration and operational capabilities of the F-35A and its likely operations in a training context, and then purport to assess the environmental impacts of that completely speculative scenario, the Air Force should withdraw the DEIS and reissue it when it has the information necessary to make a meaningful evaluation and a realistic idea of reasonable alternatives.

<sup>1</sup> We note that the President's FY 2012 budget anticipates funding F-16s for at least three more years.

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II. There is Significant Missing Information about Noise and Safety Impacts.

If the Air Force persists in going forward with the NEPA Process, it must comply fully with regulatory requirements for incomplete or unavailable information and at a minimum, issue a revised or supplemental DEIS for public review and comment when the missing information becomes available.

Should the Air Force decide to continue with the NEPA process at this time despite the paucity of empirical data and the apparent lack of ability to make real decisions in the near future, it must comply with requirements under NEPA for addressing incomplete and unavailable information under 40 C.F.R. § 1502.22. In that regard, the Air Force must either obtain reliable information about the noise and safety impacts of F-35As or explain why it is not able to do so. If the state of the F-35As is such that this information cannot be obtained because there are too many design elements still in flux, that situation again argues for putting the NEPA process on hold. If the Air Force believes that such information is or will soon be available, it must obtain that information unless it can show that the overall costs of obtaining it are exorbitant in the context of the funds already expended and authorized to be appropriated for the development of the F-35As.

Should the Air Force conclude that information relevant to reasonably foreseeable adverse effects of the F-35As, most obviously noise and safety, are impossible to obtain but it persists in going forward, it must include within the body of a revised or supplemental EIS: (1) a statement that such information is incomplete or unavailable; (2) a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment; (3) summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impacts on the human environment, and (4) the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. For the purposes of this section, "reasonably foreseeable" includes impacts that have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason.

III. The Action Alternatives Are Unrealistic and Inadequate.

As the Air Force knows, the identification and analysis of reasonable alternatives is at the heart of the NEPA process (40 C.F.R. 1502.14). Consistent with the premature timing of this DEIS, two of the three action alternatives presented for all of the alternative sites are unrealistic, "strawman," alternatives. In the DEIS, the Air Force explains that beddowns with 24 or 48 F-35As would not be cost-effective, yet it includes these two scenarios as alternatives for analysis ostensibly to "facilitate potential future decisionmaking." (DEIS, p. 2-7). Alternatives need to be "reasonable" i.e., not straw man alternatives that waste the public's time and energy in a fruitless exercise. The Air Force's apparent inability to identify reasonable and realistic alternatives at this point reinforces the notion that this proposal is not yet ripe for analysis.

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Moreover, as discussed more fully in Section VII below, the DEIS fails to analyze potentially reasonable sub-alternatives regarding the need to store and pick up ordnance and munitions at Libby Army Airfield and at Gila Bend Auxiliary Air Field.

DO-66

IV. The Analysis of the No Action Alternative is Inadequate.

The DEIS purports to use "baseline" as a surrogate for the no action alternative. While one use of baseline information can be the no action alternative, that is by no means the only purpose for including baseline information. Regardless of how it is used, however, the no action alternative must be analyzed as a "real alternative." The DEIS fails to do this. Specifically, the DEIS fails to provide any analysis regarding the effects of the no action alternative that is in any sense equivalent to its analysis of the action alternatives. Further, the "baseline" alternative is simply ignored in some contexts. One possible reason for this oversight is that the baseline alternative in places appears to be presented only as an alternative for all possible locations, meaning that no F-35As would be based anywhere, thus making the no action alternative as unrealistic and ill-suited for decisionmaking as the Tier 1 and Tier 2 action alternatives. The DEIS should provide a robust analysis of the no action alternative site by site, as opposed to across the board. For example and very importantly the baseline alternative is not included in Table 2-12, "Comparative Summary of Environmental Consequences." This is a key chart that purports to be comparing the impacts of basing these planes at various locations. Yet it completely fails to include the baseline in that comparison.

DO-40

V. The DEIS Fails to Explain NEPA Compliance for Future Decisionmaking.

The structure of the DEIS and its articulation of the number F-35As as being planned for training use along with the structure of the action alternatives suggests the possibility of decisionmaking for additional F-35A basing would occur after a decision to base an initial group of the planes. However, the DEIS fails to explain the Air Force's pathway to future decisionmaking. The public is expected to comment now on admittedly insufficient, unsupported analysis focused on several alternatives already characterized as unreasonable without really understanding what decisionmaking this analysis will support. If the Air Force plans to tier (i.e., use this as a basis from which to do further site-specific EISs or EAs) from this EIS for future decisionmaking, it should explain how it intends to do that in a revised or supplemental DEIS. Indeed, an inquiry during the February 22, 2012 informational session in Tucson elicited a response that the Air Force did anticipate using the tiering process, but this was heard by only two people who happened to be at that particular poster station. Many Tucson Forward members are confused and perplexed by the process and concerned that decisions made in the distant future that will personally affect them will be made on the basis of the inadequate analyses in this EIS without any further opportunity for future input. The Air Force should lay out with precision its plan for all F-35A training decisionmaking and explain when and how future NEPA compliance will be undertaken throughout the decisionmaking process, including opportunities for public involvement, review and comment.

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VI. The Analysis of Noise Impacts is Inadequate.

Obviously, noise impacts are among the most serious, if not the most serious, adverse consequences of the proposed basing of F-35As in Tucson. Given the significance of this issue, one would expect a robust, possibly peer-reviewed analysis of this impact. At the least, the Air Force is required, to “insure the professional integrity, including scientific integrity, of the discussion and analyses in environmental impact statements. [The Air Force] must identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement” 40 C.F.R. § 1502.24.

Instead, early in the DEIS, it is revealed that the Air Force has no intention of providing such an analysis at this stage; rather, the Air Force only offers that there will be a “follow-up to the analysis in this EIS with a subsequent noise evaluation at the selected base(s) to validate the operational profiles and noise levels and address those results through the Air Installation Compatibility Use Zone (AICUZ) program.” This discussion goes on to state that once the pilots are actually training in the F-35As at one of these locations, they will either have flown the operational profiles defined in this EIS “or modified them to accommodate the unique qualities of the F-35.” (DEIS, p. 2-64). Thus, we are led to understand quite clearly that the noise analysis in this DEIS, as it relates to the actual proposed action of basing F-35As at particular locations is being postponed until two events occur: a) the decision in regards to basing is made, and b) the final development of the design and operational use of the F35As is complete. The postponement of this analysis, which is clearly essential to a reasoned choice among alternatives, underscores the futility of putting out this DEIS before the Air Force has sufficient information. The Air Force cannot rationally make an informed decision between alternatives when some of the most critical information is to be developed at some later date after the decision has been made.

The DEIS noise analysis also fails to fully address all of the potential flight paths associated with the Tucson alternative. The omissions include failure to identify probable affected neighborhoods, including the Sam Hughes historic neighborhood, the University of Arizona campus, and Catalina Vista. The current flight path flown by ANG is not accurately depicted in the DEIS, because it fails to include midtown and central Tucson. As many of us who live in Tucson have observed, the actual ANG flight path is far more extensive than the flight path and associated “noise contours” depicted in the in the DEIS. Indeed, ANG personnel at the Q & A on Feb. 23, 2012 prior to the public comment period admitted that ANG aircraft currently fly over midtown and central Tucson, “when directed by air traffic control.” This frequent alternative is not discussed in the DEIS. Similarly, there is no discussion of the impacts of flight paths from the F-35 (as opposed to the F-16s) for flights for ordnance loading to and from Davis Monthan AFB. Further, analysis is needed for flights over public lands and recreation areas on the west side of Tucson, including Sweetwater wetlands area, Saguaro National Park West and Tucson Mountain Park. The analysis also needs to discuss how local weather, including high winds, clouds and other factors affect noise impacts.

The DEIS fails to analyze impacts of noise at 500’, and assumes that there are no impacts worth noting on residents, livestock or wildlife below 65 dB DNL. While it is, of course,

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DO-23  
NO-62

NO-59

LU-27

NO-38

NO-28

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appropriate to identify the FAA and DOD standard of 65 dB DNL as the level at which noise is incompatible with residential use and the EPA standard of 55 dB DNL as a level protective of the public health and welfare, the DEIS leaps from relying on those standards to assuming that anything below them has no impacts whatsoever. The DEIS presents no justification for this omission.

Table TU 3.2-3, reflecting “Noise Levels at Representative Noise-Sensitive Locations, Baseline Conditions and F-35A Beddown Scenarios” (DEIS, TU 27-29) omits locations representative of several particularly vulnerable populations, including children with Autism Spectrum Disorder and day care facilities. It also omits businesses that are likely to be affected by increased noise impacts, such as bed and breakfast facilities in potentially affected neighborhoods.

There is no discussion of the fact that because the F-35As at present are a one seat plane and the purpose of this proposed basing is training, there will almost always be two planes flying in tandem. The noise analysis, when it is actually done in a new DEIS, needs to assume two planes flying together or explain why this assertion is incorrect.

Finally, the distribution of the “Errata Sheet” for the DEIS received two weeks after publication of the DEIS is troubling. No explanation or context is given in the Errata Sheet for the substantial changes related to noise level comparisons. As we understand it, the changes related to noise comparisons for arriving aircraft in Tucson were achieved by lowering the F-35 throttle setting from 55% Engine Temperature Ratio (ETR) to 40% ETR along with increasing altitude from 283 feet AGL to 371 feet AGL. A revised or supplemental DEIS must clarify whether these assumptions are accurate and the basis for making these changes. The analysis also needs to indicate whether these revisions reflect anticipated, realistic safe flying conditions for approaches for pilots in training, whether these settings would be used consistently for approaches in the Tucson area and explain the methodology used for predicting noise at throttle settings as low as 40%.

VII. The DEIS Fails to Include Any Analysis of the Impacts From Flights to Davis-Monthan AFB for Loading Live and Heavy Inert Ordnance.

The DEIS briefly acknowledges that the F-35A training would include, the current practice of loading live and heavy inert ordnance at Davis-Monthan AFB for use on training ranges. . . (DEIS, p. TU-55). However, it completely omits any analysis of the impacts from the flights to Davis-Monthan as well as the impacts from flights leaving Davis-Monthan. This is completely unacceptable, leaving neighborhoods totally in the dark as to whether and how they will be affected.

The DEIS also omits any consideration of alternative sites for these ordnance activities. There is no justification given for not considering, for example, either the proposed auxiliary airfield at Sierra Vista Municipal Airport/Libby Army Airfield or the Gila Bend Auxiliary Field as possible venues for loading ordnance. These alternatives and the impacts of the additional flights required to load the ordnance should be considered in a revised or supplemental DEIS.

NO-28

NO-5  
NO-58

NO-39

NO-21

DO-30

DO-66

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VIII. There Is No Meaningful Analysis of Vibration Impact.

The DEIS also fails to address the extent to which the various alternatives will vary the level or pattern of aircraft-induced vibration in the surrounding neighborhoods and areas within the flight path. The only mention of vibration impacts is lumped in with noise impacts, and is limited to impacts to historic structures. Although historic structures are certainly of concern, particularly considering the fact that there are several historic neighborhoods within the flight path, increased vibration could have significant impacts on other community resources as well. For example, the University optics facilities are very sensitive to vibration. See [http://www.4dtechnology.com/reflib/Measuring\\_Precision\\_Telescope\\_Optics\\_with\\_a\\_Streetcar\\_Outside\\_Your\\_Door.pdf](http://www.4dtechnology.com/reflib/Measuring_Precision_Telescope_Optics_with_a_Streetcar_Outside_Your_Door.pdf).

IX. The Biological Assessment of Sensitive Species is Inadequate, Especially the Analysis of Pronghorn Antelope.

As the Air Force knows well, the Sonoran pronghorn antelope is one of the most endangered mammals in the United States. The majority of the existing U.S. population lives within the range of potential flight paths of the F-35A planes. The results of the current consultation with the U.S. Fish and Wildlife Service under the Endangered Species Act for the Luke AFB alternative have relevance for the Tucson alternative also. The results of that consultation should be reflected in the next iteration of the EIS for public review and comment.

Oddly, the Krausman, et al., study on “Effects of Military Operations on Behavior and Hearing of Endangered Sonoran Pronghorn” (JSTOR: Wildlife Monographs, No. 157, Jul., 2004), pp. 1-41) is not even cited, let alone discussed. Of course, that analysis does not include the increased intensity of sonic booms projected for the F-35A aircraft. Therefore, the Krausman study and other literature regarding pronghorn antelope and noise impacts needs to be updated as part of a revised or supplemental DEIS for public review and comment to analyze the potential effects of the F-35A overflights.

X. The Analysis of Social and Economic Impacts and Quality of Life Impacts is Inadequate.

The analysis of social and economic impacts related to environmental impacts of a proposed action is an important component of NEPA analyses. Tucson is a town of many characteristics and communities, but from an economic point of view, there is no question that tourism is a major contributor. Tourism in Tucson and Pima County is estimated to provide almost two billion dollars in direct travel spending, \$116.8 million in direct tax receipts, 22,300 jobs in direct jobs, and four million domestic overnight visitors. “Tourism Powers Tucson’s Economy”, BizTucson, Summer 2011, pp. 58-62. An important segment of that revenue is based on visitors who come to Tucson for hiking, bird watching, horseback riding and other outdoor pursuits. The public investment value associated with the county, state and federal public lands surrounding Tucson also runs into the billions. Other visitors want to enjoy quiet time at Tucson’s many resorts that feature outdoor venues.

NO-12  
NO-61  
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SO-7

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Unfortunately, the DEIS again fails utterly to even note possible impacts the proposed alternatives would have on the Tucson tourist economy, let alone provide a cogent analysis of the potential effects of the alternatives. While observing that residents may be “annoyed,” the DEIS states that the change in noise levels is “not expected to adversely impact economic decisions, property values, or other socioeconomic resources.” (DEIS, TU-118). There is not even a mention of visitors to the area and their contribution to the economy. Indeed, Table TU 3.11-3, “Potential Socioeconomic Impacts” identifies only positive economic impacts of the action alternatives. The analysis must also identify negative impacts and both positive and negative analysis of the no action alternative must be provided.

The DEIS is also grossly inadequate in its evaluation of the impacts that basing of F-35As in the Tucson area would have on nearby property values. Notably, the DEIS completely omits any discussion of A.R.S. §28-8481, the state statute related to planning and zoning in the vicinity of a military airport or ancillary military facility. This statute, which is discussed in the analysis for the Luke AFB site (LU-120) but ignored in the discussion regarding the Tucson base, requires political subdivisions to adopt land use restrictions for property located in areas designated as having high noise and accident potential. Not only are property owners in the designated “APZ” zones limited in how they develop their property, they are required to disclose the APZ designation to any potential purchaser. If, as the DEIS indicates, the activities under Scenario T3 would increase the area within the 65 dB DNL or greater noise contour by approximately 2,439 acres (DEIS at TU-93), that expansion will have a significant impact on local property values. Moreover, the resulting land use restrictions could trigger Arizona “takings” statutes, A.R.S. §12-1131 to 1138, which in turn, could expose the City of Tucson and/or Pima County to substantial liability.

Further, there is no discussion whatsoever of any social impacts in the affected neighborhoods. Many people live in Tucson because of quality of life issues, which not only bolster the economy but contribute to social cohesion. There is no attempt at analyzing which types of neighborhoods might be adversely or positively affected by the proposed basing and how the basing would affect individuals’ future decisions about remaining in their neighborhoods.

XI. The DEIS Offers No Explanation of How Climate Change Could Affect Installation and Flying Operations.

DEIS contains no discussion of how climate change in the Southwest will affect installations and flying conditions. There is now a considerable body of scientific research documenting the fact that warming is rapidly affecting the Southwest generally and Arizona in particular. Karl, T.R.; J. M. Melillo, and T.C. Peterson (eds.), 2009 Global Climate Change Impacts in the United States, Cambridge University Press. Ironically, readers of the local Tucson daily newspaper, the Arizona Daily Star, recently read an article explaining how Davis-Monthan Air Force Base and Fort Huachuca will be participating in a pilot project to predict how global warming will affect military training, including flying conditions, in the Southwest. “Military Tap UA Expertise to Cope with Impact of Climate Change”, Arizona Daily Star, March 3, 2012. Thus, we see that the Air Force appropriately is considering the effects of climate change on basing decisions while ignoring it in a DEIS that purports to be about basing

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LU-11  
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SO-11  
NO-36  
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decisions that includes several sites in the Southwest. A revised or supplemental DEIS needs to address this issue for public review and comment. AQ-18

XII. The Analysis of Cumulative Effects is Inadequate.

While accurately quoting the regulatory requirement for cumulative effects analysis at the beginning of this section, the analysis then ignores those requirements in significant part. Instead of attempting to identify and then analyze the incremental impacts of the proposed basing of F-35As in Tucson “when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person (Federal or non-Federal) undertakes such other actions” (40 C.F.R. 1508.7, underlining added), the Air Force arbitrarily narrows the baseline to “recent past and ongoing military actions in the region”. (DEIS, p. 134). Even the analysis of related Air Force actions is inadequate. For example, the impacts of the current Operation Snowbird program need to be analyzed, along with the likelihood of future F-35 involvement in that program. Similarly, the impacts from Operation Noble Eagle needs to be analyzed in this context. The acknowledgement in the DEIS that impacts could be higher than evaluated due to several circumstances, including Operation Snowbird (DEIS, Executive Summary, 68) is not a substitute for a credible analysis of what those impacts are likely to be in the reasonably foreseeable future. CM-2

The analysis of non-Air Force activities is dramatically unsatisfactory. The textual discussion and chart briefly allude to a few other activities, but the identification of actions is inadequate. There is not even recognition, for example, of the many actions taking place in the Tucson Sector of the Border Patrol, including tall structures and unmanned aircraft, let alone civilian aircraft in the area. The Air Force needs to consult with federal, state, local and tribal agencies taking actions in the affected area as well as identify any major private actions that could have a synergistic effect combined with the impacts of the proposed F-35A basing. CM-3

Further, the discussion of the few actions in the cumulative effects section is generally devoid of any actual analysis. Instead, the readers are presented with simply a short and incomplete list of these actions. While identifying the other actions is the first step in beginning to analyze cumulative effects, the Air Force must finish the work by actually analyzing how the various military and civilian activities will affect the same resources as those related to the basing of the F-35As. Spatial and temporal boundaries of analysis must be developed for each type of affected resource. NEPA law has been clear for years that federal agencies cannot fulfill their obligation to analyze cumulative effects by merely providing a list of other actions.<sup>2</sup> Again, this analysis needs to be substantially revised and supplemented and circulated for public review and comment. CM-5

<sup>2</sup> For example, in 1999, the Ninth Circuit Court of Appeals held that the cumulative effects analysis for a proposed land exchange was inadequate. The EIS text simply indicated “the amount of land to be exchanged, [with] no evaluation whatsoever of the impact of natural resources of timber harvesting . . . .” *Muckleshoot Indian Tribe v. U.S. Forest Service*, 177 F.3d 800. The Ninth Circuit again emphasized the need for analysis in *Center for Biological Diversity v. National Highway Traffic Safety Administration*, 538 F.3d 1172 (2008) when it found inadequate NEPA analysis for proposed fuel economy standards because the analysis did not evaluate the incremental impact of other past, present and reasonably foreseeable actions when combined when the proposed action. See also, *Klamath-Siskiyou Willdlands Center*, 387 F.3d 989, 995 (9<sup>th</sup> Cir. 2004). CM-7

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XIII. The Discussion of Unavoidable Impacts is Inadequate.

The DEIS contains the rather unremarkable statement that, “[u]navoidable adverse impacts are impacts identified during the public and agency review of the Draft EIS that cannot be mitigated to an acceptable level.” (DEIS, p. 2-66) It is the Air Force first and foremost that has the responsibility for identifying those unavoidable impacts that cannot be mitigated to acceptable levels and the public must have an opportunity to review that analysis and comment on it. Waiting until the FEIS and ROD to present that analysis is unacceptable. NP-33

XIV. The Discussion of Mitigation is Inadequate.

In general, the discussion of mitigation measures is woefully inadequate. As the Air Force knows, the law is clear that:

[O]ne important ingredient of an EIS is the discussion of steps that can be taken to mitigate adverse environmental consequences. . . Implicit in NEPA’s demand that an agency prepare a detailed statement on “any adverse environmental effects which cannot be avoided should the proposal be implemented,” is an understanding that the EIS will discuss the extent to which adverse effects can be avoided. . . . More generally, omission of a reasonably complete discussion of possible mitigation measures would undermine the “actionforcing” function of NEPA. Without such a discussion, neither the agency nor other interested groups and individuals can properly evaluate the severity of the adverse effects. An adverse effect that can be fully remedied by, for example, an inconsequential public expenditure is certainly not as serious as a similar effect that can only be remedied through the commitment of vast public and private resources. NP-33

*Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 at 351-351 (1989).

The Council on Environmental Quality (CEQ) recently reemphasized the importance of mitigation under NEPA, both in terms of promoting efforts to prevent or eliminate damage to the human environment and to meet the requirements of disclosure and analysis for the public, the decisionmaker and other government agencies. That guidance includes a robust discussion of the need for candor, not only in terms of the ability of the agency to legally undertake or require mitigation but in terms of funding for implementation of mitigation commitments. *Memorandum for Heads of Federal Departments and Agencies on the Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact* from Nancy H. Sutley, Chair, Council on Environmental Quality, January 14, 2011. NP-33

The Air Force itself recognizes and incorporates the requirement of identifying and analyzing mitigation measures in its NEPA regulations. That regulation states that the NEPA documents must indicate “clearly” whether mitigation measures must be implemented and must specifically identify which mitigation measures, if any, have already been incorporated into the proposal and which are being proposed. As the Air Force regulations correctly notes, “Both the public and the Air Force community need to know what commitments are being considered and selected, and who will be responsible for implementing, funding and monitoring the mitigation measures” 32 C.F.R. § 989.22.

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However, despite the mandate to identify mitigation measures in the DEIS for public and interagency review and comment, the DEIS here practically ignores mitigation measures. There is a one and a half page discussion of mitigation in Chapter 2 that includes the definition of mitigation and the identification of a few measures (with no discussion or analysis) that have been incorporated into the overall design of alternatives. These measures include such unremarkable steps as coordination with the FAA and consultation with State Historic Preservation Officer (SHPO) and government to government tribal consultations (p. 2-66). Most of these action items are actually legal requirements. Some of these processes, such as consultation with tribes and the SHPO and coordination with the FAA, could well result in the identification of mitigation measures, but if that is the case, those need to be identified and published for public review and comment in the next iteration of a DEIS.

Further, mitigation measures within the Tucson site-specific analysis is either lacking entirely or inadequate. Notably, there is virtually no serious discussion of mitigation measures for noise. Although the City of Tucson previously made a half-hearted application to the Governor's Military Affairs Military Installations Fund for a study of a sound attenuation program, the City was turned down and has made no further effort to address the issue. While more empty promises are not wanted, the community needs to understand if any mitigation measures for noise will be considered, what those might be, and what funding might actually be available to implement them. While Pima County has recently proposed to put a future bond issue before the voters to, among other things, establish a new initiative to mitigate adverse noise impacts associated with Air Force overflights, timing and passage of the bond measure is both uncertain and unlikely for a number of reasons. The Air Force must candidly identify those uncertainties along with other possible sources of funding in its next iteration of a DEIS.

One of the few issues for which mitigation is discussed at all locally is for traffic conditions. Under alternative T2, vehicle trips are projected to increase by 10% and under T3 by 18%. Either of these developments would add significant congestion to adjacent streets, but the only mitigation is adjustment of operations schedules and/or additional personnel at the installation gate. (DEIS, p. 2-61). There is no indication that any traffic studies have been done in coordination with Pima County or Arizona Department of Transportation to determine the adequacy of such measures.

In summary, the treatment of mitigation in the DEIS is so minimal and inadequate as to be almost nonexistent. NEPA requires that reasonable mitigation measures be identified and analyzed in a revised or supplemental DEIS and that those adverse impacts that cannot be mitigated be clearly identified at the same time.

XV. The DEIS Fails to Include Any Analysis or Even Identification of Process for Relocation of F-16s.

Throughout the DEIS, there are references to the necessary relocation of F-16s from whatever base(s) is chosen for basing of F-35As for training. The discussion implies that the relocation of the F-16s is an interdependent part of the action, triggered by the potential basing of the F-35As. Yet nothing in the DEIS explains to the public why the analysis of this potential connected action is not included in the DEIS, why there is no indication of where the F-16s

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might be moved and whether they would be potentially located in the same area as any of the alternative installations analyzed in the DEIS. The Air Force should explain in a revised or supplemental DEIS whether it considers the relocation a "connected action" under NEPA that needs to be analyzed in the same DEIS per the requirements of 40 C.F.R. § 1508.25(1).

XVI. There Were Process Problems with the Public Hearings.

Finally, we want to note several problems with the process associated with the public hearings held in Tucson in regards to the DEIS. As the DEIS notes, almost 45% of Pima County residents are minority populations, the majority of which are of Hispanic origin. (DEIS, TU-119). Also as noted in the DEIS, the number of minority residents who could be affected by the various scenarios range from the 378 individuals identified in the baseline conditions to 7,530 for Scenario T3 (DEIS, TU-119). Further, the DEIS acknowledges that the various aircraft scenarios "would present a disproportionately high and adverse environmental impact on low-income populations." (DEIS, TU-120). Many of those low income residents are Hispanic. Yet, inexplicably, we are aware of no public notices disseminated in Spanish. When asking for posters, information sheets, and literature in Spanish, a Tucson Forward Director was advised that none were available. Further, the first public meeting in Tucson, held much closer to the potential site of the basing and the lower income neighborhoods than the second public meeting in Tucson, was held on Ash Wednesday, an important religious observance, especially in the Hispanic community. The well-attended, second public meeting was held outside of the City in the foothills area, some 13 miles from the TAGS airport.

Another public hearing notice deficiency was evident at the first meeting when the public was informed that the Air Force was also taking comments on the National Historic Preservation Act process (the "Section 106 process") at the public hearing. There was no mention of taking comments on the 106 process in any of the written notices; indeed, we had no idea this was the case until we heard this comment. Members of the Tohono O'Odaham Nation, archaeologists and others may well have chosen to attend if they had been informed of this. The lack of comments addressing this topic bears testimony to the failure of the Air Force to inform the public that they would be taking comments in regards to this separate legal process.

Further, while at least one Air Force representative explained "tiering" to a few people during the information/poster session, there was no discussion of tiering either during the overall remarks nor in the public notices. It is imperative that the potentially affected communities understand the full scope of planned NEPA compliance for these activities. There has been considerable confusion among members of Tucson Forward regarding the relationship of the action alternatives to the no action alternatives and how NEPA and other environmental laws would apply to any future basing decisions not directly resulting from an initial decision based on this particular EIS track.

In conclusion, it is apparent that this DEIS was pushed out the door prematurely and inappropriately. The most fundamental aspects of the proposed action – the design and operational capabilities of the F-35A – are yet to be determined. Analysis of the adverse impacts of most concern to the public is deferred until after the decision that this very DEIS is intended to support. Other glaring inadequacies and omissions appear to reflect either carelessness and/or an

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intent to highlight only potential beneficial impacts of F-35A basing (such as economic benefits while omitting adverse economic impacts.) We ask that the Air Force withdraw the DEIS and not go forward with the NEPA process until it has the ability to accurately analyze the impacts of the F-35A in a training mode. Alternatively, if the Air Force chooses to go forward, it must, at a minimum, publish a revised or supplemental DEIS for public review and comment addressing the various deficiencies noted above.

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Sincerely,  
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March 14, 2012

VIA U.S. MAIL AND ELECTRONIC MAIL  
Mr. David Martin, Air Force Contractor  
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HQ AETC/A7CPP  
266 F Street West, Building 901  
Randolph Air Force Base, TX 78150-4319

Re: Proposed Pilot Training Center and Basing of F-35A Training Aircraft EIS

Dear Mr. Martin and Ms. Fornof:

This letter represents the response to the solicitation of comments on the draft environmental impact statement (DEIS) for the proposed Pilot Training Center and Basing of F-35A Training Aircraft from Tucson Forward and the Arizona Center for Law in the Public Interest ("Center").

Tucson Forward is a non-profit organization that aims to protect Tucson and its neighborhoods from health damaging noise and safety concerns related to the F-35 Joint Strike Fighter and other military aircraft. Our goal is to foster economic, scientific and technological development of Tucson in a way that supports and promotes a good quality of life for all its citizens. The communities we represent would be affected in a number of ways should the proposed basing of the F-35As and the pilot training center be established in Tucson.

The Center is a nonprofit law firm dedicated to ensuring government accountability and protecting the legal rights of Arizonans. It frequently works with community groups that are concerned about the environmental impacts of proposed government projects or actions, and assists them in navigating the NEPA process.

Both of our organizations believe publication of this DEIS, as demonstrated by the inadequate analyses discussed below, is premature and that the DEIS should be withdrawn and rewritten and published for public review and comment when the design and operations of the F-35A are completed and understood sufficiently. Should the Air Force choose to proceed at this point, at a minimum, it must publish a revised or supplemental DEIS for public review and comment which addresses the many deficiencies outlined below.

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I. The DEIS Is Premature.

We understand that the idea that publication of a DEIS is premature is an unusual argument to make in the context of NEPA. Generally, citizens complain that the process commences too late and indeed the entire thrust of NEPA law is to require analyses at the earliest possible time. However, the earliest possible time by definition exists, “at that stage in the development of an action when an agency subject to the Act has a goal and is actively preparing to make a decision on one or more alternative means of accomplishing that goal and the effects can be meaningfully evaluated.” 40 C.F.R. § 1508.23 (emphasis added).

In this unusual scenario, the Air Force admits in the DEIS that this analysis of aircraft types and numbers is “not currently ripe for decisionmaking” (Executive Summary p. 7, DEIS, p. 2-7, emphasis added). This is understandable, given the serious difficulties and delays identified by the Air Force itself and discussed in the November 29, 2011, “F-35 Joint Strike Fighter Concurrency Quick Look Review.” That report identified a number of major consequence issues, the combined impact of which “results in a lack of confidence in the design stability” and concluded that, “the current confidence in the design maturity of the F-35 to be lower than one would expect . . .”(Executive Summary, pp. 1-2). The consequences of these deficiencies reverberate throughout the analysis. And at the February 23, 2012, public meeting in Tucson regarding the DEIS, an Air Force representative at the informational session made an important admission. After describing F-16 noise abatement procedures to a group of citizens clustered around a poster, he stated that, “we don’t know design of the F35 yet so I don’t have a clue how we will handle that” here.

Basic information essential to the analysis of noise and safety and other impacts is not available given that, as the DEIS points out, “information from existing operations is unavailable.” (p. 2-18). This lack of empirical data undermines the entire body of analyses. The dramatic changes in noise levels reflected in the errata sheet for the DEIS released on January 20, 2012, further reflects these uncertainties. Further, premature publication of the DEIS, besides resulting in a fundamentally inadequate document, appears unnecessary given the attenuated schedule for decisionmaking.<sup>1</sup> News reports in trade press indicate that, “[l]here is no known date when the F-35 will be cleared for safe flight to train pilots” and that the program is so burdened with problems that friendly governments that had anticipated purchasing aircraft are considering a delay for at least several years. “F-35 Lightning II News – Australia may delay 12 of 14 F-35s in initial order,” F-16 net, Jan. 30, 2012, available at [http://www.f16.net/news\\_article4509.html](http://www.f16.net/news_article4509.html). See also, “US F-35 production slowdown may delay foreign orders” Reuters, Feb. 10, 2012, available at <http://www.reuters.com/article/2012/02/11/lockheed-fighter-idUSL2E8D91LC20120211>.

In short, rather than continuing to essentially guess as to the final configuration and operational capabilities of the F-35A and its likely operations in a training context, and then purport to assess the environmental impacts of that completely speculative scenario, the Air Force should withdraw the DEIS and reissue it when it has the information necessary to make a meaningful evaluation and a realistic idea of reasonable alternatives.

<sup>1</sup> We note that the President’s FY 2012 budget anticipates funding F-16s for at least three more years.

NP-13

NP-13

NO-21

NP-37

NP-13

II. There is Significant Missing Information about Noise and Safety Impacts.

If the Air Force persists in going forward with the NEPA Process, it must comply fully with regulatory requirements for incomplete or unavailable information and at a minimum, issue a revised or supplemental DEIS for public review and comment when the missing information becomes available.

Should the Air Force decide to continue with the NEPA process at this time despite the paucity of empirical data and the apparent lack of ability to make real decisions in the near future, it must comply with requirements under NEPA for addressing incomplete and unavailable information under 40 C.F.R. § 1502.22. In that regard, the Air Force must either obtain reliable information about the noise and safety impacts of F-35As or explain why it is not able to do so. If the state of the F-35As is such that this information cannot be obtained because there are too many design elements still in flux, that situation again argues for putting the NEPA process on hold. If the Air Force believes that such information is or will soon be available, it must obtain that information unless it can show that the overall costs of obtaining it are exorbitant in the context of the funds already expended and authorized to be appropriated for the development of the F-35As.

Should the Air Force conclude that information relevant to reasonably foreseeable adverse effects of the F-35As, most obviously noise and safety, are impossible to obtain but it persists in going forward, it must include within the body of a revised or supplemental EIS: (1) a statement that such information is incomplete or unavailable; (2) a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment; (3) summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impacts on the human environment, and (4) the agency’s evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. For the purposes of this section, “reasonably foreseeable” includes impacts that have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason.

III. The Action Alternatives Are Unrealistic and Inadequate.

As the Air Force knows, the identification and analysis of reasonable alternatives is at the heart of the NEPA process (40 C.F.R. 1502.14). Consistent with the premature timing of this DEIS, two of the three action alternatives presented for all of the alternative sites are unrealistic, “strawman,” alternatives. In the DEIS, the Air Force explains that beddowns with 24 or 48 F-35As would not be cost-effective, yet it includes these two scenarios as alternatives for analysis ostensibly to “facilitate potential future decisionmaking.” (DEIS, p. 2-7). Alternatives need to be “reasonable” i.e., not straw man alternatives that waste the public’s time and energy in a fruitless exercise. The Air Force’s apparent inability to identify reasonable and realistic alternatives at this point reinforces the notion that this proposal is not yet ripe for analysis.

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Moreover, as discussed more fully in Section VII below, the DEIS fails to analyze potentially reasonable sub-alternatives regarding the need to store and pick up ordnance and munitions at Libby Army Airfield and at Gila Bend Auxiliary Air Field.

DO-66

IV. The Analysis of the No Action Alternative is Inadequate.

The DEIS purports to use “baseline” as a surrogate for the no action alternative. While one use of baseline information can be the no action alternative, that is by no means the only purpose for including baseline information. Regardless of how it is used, however, the no action alternative must be analyzed as a “real alternative.” The DEIS fails to do this. Specifically, the DEIS fails to provide any analysis regarding the effects of the no action alternative that is in any sense equivalent to its analysis of the action alternatives. Further, the “baseline” alternative is simply ignored in some contexts. One possible reason for this oversight is that the baseline alternative in places appears to be presented only as an alternative for all possible locations, meaning that no F-35As would be based anywhere, thus making the no action alternative as unrealistic and ill-suited for decisionmaking as the Tier 1 and Tier 2 action alternatives. The DEIS should provide a robust analysis of the no action alternative site by site, as opposed to across the board. For example and very importantly the baseline alternative is not included in Table 2-12, “Comparative Summary of Environmental Consequences.” This is a key chart that purports to be comparing the impacts of basing these planes at various locations. Yet it completely fails to include the baseline in that comparison.

DO-40

V. The DEIS Fails to Explain NEPA Compliance for Future Decisionmaking.

The structure of the DEIS and its articulation of the number F-35As as being planned for training use along with the structure of the action alternatives suggests the possibility of decisionmaking for additional F-35A basing would occur after a decision to base an initial group of the planes. However, the DEIS fails to explain the Air Force’s pathway to future decisionmaking. The public is expected to comment now on admittedly insufficient, unsupportable analysis focused on several alternatives already characterized as unreasonable without really understanding what decisionmaking this analysis will support. If the Air Force plans to tier (i.e., use this as a basis from which to do further site-specific EISs or EAs) from this EIS for future decisionmaking, it should explain how it intends to do that in a revised or supplemental DEIS. Indeed, an inquiry during the February 22, 2012 informational session in Tucson elicited a response that the Air Force did anticipate using the tiering process, but this was heard by only two people who happened to be at that particular poster station. Many Tucson Forward members are confused and perplexed by the process and concerned that decisions made in the distant future that will personally affect them will be made on the basis of the inadequate analyses in this EIS without any further opportunity for future input. The Air Force should lay out with precision its plan for all F-35A training decisionmaking and explain when and how future NEPA compliance will be undertaken throughout the decisionmaking process, including opportunities for public involvement, review and comment.

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VI. The Analysis of Noise Impacts is Inadequate.

Obviously, noise impacts are among the most serious, if not the most serious, adverse consequences of the proposed basing of F-35As in Tucson. Given the significance of this issue, one would expect a robust, possibly peer-reviewed analysis of this impact. At the least, the Air Force is required, to “insure the professional integrity, including scientific integrity, of the discussion and analyses in environmental impact statements. [The Air Force] must identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement” 40 C.F.R. § 1502.24.

Instead, early in the DEIS, it is revealed that the Air Force has no intention of providing such an analysis at this stage; rather, the Air Force only offers that there will be a “follow-up to the analysis in this EIS with a subsequent noise evaluation at the selected base(s) to validate the operational profiles and noise levels and address those results through the Air Installation Compatibility Use Zone (AICUZ) program.” This discussion goes on to state that once the pilots are actually training in the F-35As at one of these locations, they will either have flown the operational profiles defined in this EIS “or modified them to accommodate the unique qualities of the F-35.” (DEIS, p. 2-64). Thus, we are led to understand quite clearly that the noise analysis in this DEIS, as it relates to the actual proposed action of basing F-35As at particular locations is being postponed until two events occur: a) the decision in regards to basing is made, and b) the final development of the design and operational use of the F35As is complete. The postponement of this analysis, which is clearly essential to a reasoned choice among alternatives, underscores the futility of putting out this DEIS before the Air Force has sufficient information. The Air Force cannot rationally make an informed decision between alternatives when some of the most critical information is to be developed at some later date after the decision has been made.

NO-100

The DEIS noise analysis also fails to fully address all of the potential flight paths associated with the Tucson alternative. The omissions include failure to identify probable affected neighborhoods, including the Sam Hughes historic neighborhood, the University of Arizona campus, and Catalina Vista. The current flight path flown by ANG is not accurately depicted in the DEIS, because it fails to include midtown and central Tucson. As many of us who live in Tucson have observed, the actual ANG flight path is far more extensive than the flight path and associated “noise contours” depicted in the in the DEIS. Indeed, ANG personnel at the Q & A on Feb. 23, 2012 prior to the public comment period admitted that ANG aircraft currently fly over midtown and central Tucson, “when directed by air traffic control.” This frequent alternative is not discussed in the DEIS. Similarly, there is no discussion of the impacts of flight paths from the F-35 (as opposed to the F-16s) for flights for ordnance loading to and from Davis Monthan AFB. Further, analysis is needed for flights over public lands and recreation areas on the west side of Tucson, including Sweetwater wetlands area, Saguaro National Park West and Tucson Mountain Park. The analysis also needs to discuss how local weather, including high winds, clouds and other factors affect noise impacts.

DO-23  
NO-62

NO-59

LU-27

NO-38

The DEIS fails to analyze impacts of noise at 500’, and assumes that there are no impacts worth noting on residents, livestock or wildlife below 65 dB DNL. While it is, of course,

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appropriate to identify the FAA and DOD standard of 65 dB DNL as the level at which noise is incompatible with residential use and the EPA standard of 55 dB DNL as a level protective of the public health and welfare, the DEIS leaps from relying on those standards to assuming that anything below them has no impacts whatsoever. The DEIS presents no justification for this omission. NO-28

Table TU 3.2-3, reflecting “Noise Levels at Representative Noise-Sensitive Locations, Baseline Conditions and F-35A Beddown Scenarios” (DEIS, TU 27-29) omits locations representative of several particularly vulnerable populations, including children with Autism Spectrum Disorder and day care facilities. It also omits businesses that are likely to be affected by increased noise impacts, such as bed and breakfast facilities in potentially affected neighborhoods. NO-5  
NO-58

There is no discussion of the fact that because the F-35As at present are a one seat plane and the purpose of this proposed basing is training, there will almost always be two planes flying in tandem. The noise analysis, when it is actually done in a new DEIS, needs to assume two planes flying together or explain why this assertion is incorrect. NO-39

Finally, the distribution of the “Errata Sheet” for the DEIS received two weeks after publication of the DEIS is troubling. No explanation or context is given in the Errata Sheet for the substantial changes related to noise level comparisons. As we understand it, the changes related to noise comparisons for arriving aircraft in Tucson were achieved by lowering the F-35 throttle setting from 55% Engine Temperature Ratio (ETR) to 40% ETR along with increasing altitude from 283 feet AGL to 371 feet AGL. A revised or supplemental DEIS must clarify whether these assumptions are accurate and the basis for making these changes. The analysis also needs to indicate whether these revisions reflect anticipated, realistic safe flying conditions for approaches for pilots in training, whether these settings would be used consistently for approaches in the Tucson area and explain the methodology used for predicting noise at throttle settings as low as 40%. NO-21

VII. The DEIS Fails to Include Any Analysis of the Impacts From Flights to Davis-Monthan AFB for Loading Live and Heavy Inert Ordnance.

The DEIS briefly acknowledges that the F-35A training would include, the current practice of loading live and heavy inert ordnance at Davis-Monthan AFB for use on training ranges. . . . (DEIS, p. TU-55). However, it completely omits any analysis of the impacts from the flights to Davis-Monthan as well as the impacts from flights leaving Davis-Monthan. This is completely unacceptable, leaving neighborhoods totally in the dark as to whether and how they will be affected. DO-30

The DEIS also omits any consideration of alternative sites for these ordnance activities. There is no justification given for not considering, for example, either the proposed auxiliary airfield at Sierra Vista Municipal Airport/Libby Army Airfield or the Gila Bend Auxiliary Field as possible venues for loading ordnance. These alternatives and the impacts of the additional flights required to load the ordnance should be considered in a revised or supplemental DEIS. DO-66

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VIII. There Is No Meaningful Analysis of Vibration Impact.

The DEIS also fails to address the extent to which the various alternatives will vary the level or pattern of aircraft-induced vibration in the surrounding neighborhoods and areas within the flight path. The only mention of vibration impacts is lumped in with noise impacts, and is limited to impacts to historic structures. Although historic structures are certainly of concern, particularly considering the fact that there are several historic neighborhoods within the flight path, increased vibration could have significant impacts on other community resources as well. For example, the University optics facilities are very sensitive to vibration. See [http://www.4dtechnology.com/reflib/Measuring\\_Precision\\_Telescope\\_Optics\\_with\\_a\\_Streetcar\\_Outside\\_Your\\_Door.pdf](http://www.4dtechnology.com/reflib/Measuring_Precision_Telescope_Optics_with_a_Streetcar_Outside_Your_Door.pdf). NO-12  
NO-61

IX. The Biological Assessment of Sensitive Species is Inadequate, Especially the Analysis of Pronghorn Antelope.

As the Air Force knows well, the Sonoran pronghorn antelope is one of the most endangered mammals in the United States. The majority of the existing U.S. population lives within the range of potential flight paths of the F-35A planes. The results of the current consultation with the U.S. Fish and Wildlife Service under the Endangered Species Act for the Luke AFB alternative have relevance for the Tucson alternative also. The results of that consultation should be reflected in the next iteration of the EIS for public review and comment. BI-6

Oddly, the Krausman, et al., study on “Effects of Military Operations on Behavior and Hearing of Endangered Sonoran Pronghorn” (JSTOR: Wildlife Monographs, No. 157, Jul., 2004), pp. 1-41) is not even cited, let alone discussed. Of course, that analysis does not include the increased intensity of sonic booms projected for the F-35A aircraft. Therefore, the Krausman study and other literature regarding pronghorn antelope and noise impacts needs to be updated as part of a revised or supplemental DEIS for public review and comment to analyze the potential effects of the F-35A overflights. BI-9  
BI-5

X. The Analysis of Social and Economic Impacts and Quality of Life Impacts is Inadequate.

The analysis of social and economic impacts related to environmental impacts of a proposed action is an important component of NEPA analyses. Tucson is a town of many characteristics and communities, but from an economic point of view, there is no question that tourism is a major contributor. Tourism in Tucson and Pima County is estimated to provide almost two billion dollars in direct travel spending, \$116.8 million in direct tax receipts, 22,300 jobs in direct jobs, and four million domestic overnight visitors. “Tourism Powers Tucson’s Economy”, BizTucson, Summer 2011, pp. 58-62. An important segment of that revenue is based on visitors who come to Tucson for hiking, bird watching, horseback riding and other outdoor pursuits. The public investment value associated with the county, state and federal public lands surrounding Tucson also runs into the billions. Other visitors want to enjoy quiet time at Tucson’s many resorts that feature outdoor venues. SO-7

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Unfortunately, the DEIS again fails utterly to even note possible impacts the proposed alternatives would have on the Tucson tourist economy, let alone provide a cogent analysis of the potential effects of the alternatives. While observing that residents may be “annoyed,” the DEIS states that the change in noise levels is “not expected to adversely impact economic decisions, property values, or other socioeconomic resources.” (DEIS, TU-118). There is not even a mention of visitors to the area and their contribution to the economy. Indeed, Table TU 3.11-3, “Potential Socioeconomic Impacts” identifies only positive economic impacts of the action alternatives. The analysis must also identify negative impacts and both positive and negative analysis of the no action alternative must be provided.

The DEIS is also grossly inadequate in its evaluation of the impacts that basing of F-35As in the Tucson area would have on nearby property values. Notably, the DEIS completely omits any discussion of A.R.S. §28-8481, the state statute related to planning and zoning in the vicinity of a military airport or ancillary military facility. This statute, which is discussed in the analysis for the Luke AFB site (LU-120) but ignored in the discussion regarding the Tucson base, requires political subdivisions to adopt land use restrictions for property located in areas designated as having high noise and accident potential. Not only are property owners in the designated “APZ” zones limited in how they develop their property, they are required to disclose the APZ designation to any potential purchaser. If, as the DEIS indicates, the activities under Scenario T3 would increase the area within the 65 dB DNL or greater noise contour by approximately 2,439 acres (DEIS at TU-93), that expansion will have a significant impact on local property values. Moreover, the resulting land use restrictions could trigger Arizona “takings” statutes, A.R.S. §12-1131 to 1138, which in turn, could expose the City of Tucson and/or Pima County to substantial liability.

Further, there is no discussion whatsoever of any social impacts in the affected neighborhoods. Many people live in Tucson because of quality of life issues, which not only bolster the economy but contribute to social cohesion. There is no attempt at analyzing which types of neighborhoods might be adversely or positively affected by the proposed basing and how the basing would affect individuals’ future decisions about remaining in their neighborhoods.

XI. The DEIS Offers No Explanation of How Climate Change Could Affect Installation and Flying Operations.

DEIS contains no discussion of how climate change in the Southwest will affect installations and flying conditions. There is now a considerable body of scientific research documenting the fact that warming is rapidly affecting the Southwest generally and Arizona in particular. Karl, T.R.; J. M. Melilo, and T.C. Peterson (eds.), 2009 Global Climate Change Impacts in the United States, Cambridge University Press. Ironically, readers of the local Tucson daily newspaper, the Arizona Daily Star, recently read an article explaining how Davis-Monthan Air Force Base and Fort Huachuca will be participating in a pilot project to predict how global warming will affect military training, including flying conditions, in the Southwest. “Military Tap UA Expertise to Cope with Impact of Climate Change”, Arizona Daily Star, March 3, 2012. Thus, we see that the Air Force appropriately is considering the effects of climate change on basing decisions while ignoring it in a DEIS that purports to be about basing

SO-7

SO-13

SO-1

LU-11

SO-1

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NO-36

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decisions that includes several sites in the Southwest. A revised or supplemental DEIS needs to address this issue for public review and comment.

XII. The Analysis of Cumulative Effects is Inadequate.

While accurately quoting the regulatory requirement for cumulative effects analysis at the beginning of this section, the analysis then ignores those requirements in significant part. Instead of attempting to identify and then analyze the incremental impacts of the proposed basing of F-35As in Tucson “when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person (Federal or non-Federal) undertakes such other actions” (40 C.F.R. 1508.7, underlining added), the Air Force arbitrarily narrows the baseline to “recent past and ongoing military actions in the region”. (DEIS, p. 134). Even the analysis of related Air Force actions is inadequate. For example, the impacts of the current Operation Snowbird program need to be analyzed, along with the likelihood of future F-35 involvement in that program. Similarly, the impacts from Operation Noble Eagle needs to be analyzed in this context. The acknowledgement in the DEIS that impacts could be higher than evaluated due to several circumstances, including Operation Snowbird (DEIS, Executive Summary, 68) is not a substitute for a credible analysis of what those impacts are likely to be in the reasonably foreseeable future.

The analysis of non-Air Force activities is dramatically unsatisfactory. The textual discussion and chart briefly allude to a few other activities, but the identification of actions is inadequate. There is not even recognition, for example, of the many actions taking place in the Tucson Sector of the Border Patrol, including tall structures and unmanned aircraft, let alone civilian aircraft in the area. The Air Force needs to consult with federal, state, local and tribal agencies taking actions in the affected area as well as identify any major private actions that could have a synergistic effect combined with the impacts of the proposed F-35A basing.

Further, the discussion of the few actions in the cumulative effects section is generally devoid of any actual analysis. Instead, the readers are presented with simply a short and incomplete list of these actions. While identifying the other actions is the first step in beginning to analyze cumulative effects, the Air Force must finish the work by actually analyzing how the various military and civilian activities will affect the same resources as those related to the basing of the F-35As. Spatial and temporal boundaries of analysis must be developed for each type of affected resource. NEPA law has been clear for years that federal agencies cannot fulfill their obligation to analyze cumulative effects by merely providing a list of other actions.<sup>2</sup> Again, this analysis needs to be substantially revised and supplemented and circulated for public review and comment.

<sup>2</sup> For example, in 1999, the Ninth Circuit Court of Appeals held that the cumulative effects analysis for a proposed land exchange was inadequate. The EIS text simply indicated “the amount of land to be exchanged, [with] no evaluation whatsoever of the impact of natural resources of timber harvesting . . . .” *Muckleshoot Indian Tribe v. U.S. Forest Service*, 177 F.3d 800. The Ninth Circuit again emphasized the need for analysis in *Center for Biological Diversity v. National Highway Traffic Safety Administration*, 538 F.3d 1172 (2008) when it found inadequate NEPA analysis for proposed fuel economy standards because the analysis did not evaluate the incremental impact of other past, present and reasonably foreseeable actions when combined when the proposed action. *See also, Klamath-Siskiyou Wildlands Center*, 387 F.3d 989, 995 (9<sup>th</sup> Cir. 2004).

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XIII. The Discussion of Unavoidable Impacts is Inadequate.

The DEIS contains the rather unremarkable statement that, “[u]navoidable adverse impacts are impacts identified during the public and agency review of the Draft EIS that cannot be mitigated to an acceptable level.” (DEIS, p. 2-66) It is the Air Force first and foremost that has the responsibility for identifying those unavoidable impacts that cannot be mitigated to acceptable levels and the public must have an opportunity to review that analysis and comment on it. Waiting until the FEIS and ROD to present that analysis is unacceptable.

NP-33

XIV. The Discussion of Mitigation is Inadequate.

In general, the discussion of mitigation measures is woefully inadequate. As the Air Force knows, the law is clear that:

[O]ne important ingredient of an EIS is the discussion of steps that can be taken to mitigate adverse environmental consequences. . . Implicit in NEPA’s demand that an agency prepare a detailed statement on “any adverse environmental effects which cannot be avoided should the proposal be implemented,” is an understanding that the EIS will discuss the extent to which adverse effects can be avoided. . . . More generally, omission of a reasonably complete discussion of possible mitigation measures would undermine the “actionforcing” function of NEPA. Without such a discussion, neither the agency nor other interested groups and individuals can properly evaluate the severity of the adverse effects. An adverse effect that can be fully remedied by, for example, an inconsequential public expenditure is certainly not as serious as a similar effect that can only be remedied through the commitment of vast public and private resources.

NP-33

*Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 at 351-351 (1989).

The Council on Environmental Quality (CEQ) recently reemphasized the importance of mitigation under NEPA, both in terms of promoting efforts to prevent or eliminate damage to the human environment and to meet the requirements of disclosure and analysis for the public, the decisionmaker and other government agencies. That guidance includes a robust discussion of the need for candor, not only in terms of the ability of the agency to legally undertake or require mitigation but in terms of funding for implementation of mitigation commitments. *Memorandum for Heads of Federal Departments and Agencies on the Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact* from Nancy H. Sutley, Chair, Council on Environmental Quality, January 14, 2011.

The Air Force itself recognizes and incorporates the requirement of identifying and analyzing mitigation measures in its NEPA regulations. That regulation states that the NEPA documents must indicate “clearly” whether mitigation measures must be implemented and must specifically identify which mitigation measures, if any, have already been incorporated into the proposal and which are being proposed. As the Air Force regulations correctly notes, “Both the public and the Air Force community need to know what commitments are being considered and selected, and who will be responsible for implementing, funding and monitoring the mitigation measures” 32 C.F.R. § 989.22.

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However, despite the mandate to identify mitigation measures in the DEIS for public and interagency review and comment, the DEIS here practically ignores mitigation measures. There is a one and a half page discussion of mitigation in Chapter 2 that includes the definition of mitigation and the identification of a few measures (with no discussion or analysis) that have been incorporated into the overall design of alternatives. These measures include such unremarkable steps as coordination with the FAA and consultation with State Historic Preservation Officer (SHPO) and government to government tribal consultations (p. 2-66). Most of these action items are actually legal requirements. Some of these processes, such as consultation with tribes and the SHPO and coordination with the FAA, could well result in the identification of mitigation measures, but if that is the case, those need to be identified and published for public review and comment in the next iteration of a DEIS.

Further, mitigation measures within the Tucson site-specific analysis is either lacking entirely or inadequate. Notably, there is virtually no serious discussion of mitigation measures for noise. Although the City of Tucson previously made a half-hearted application to the Governor’s Military Affairs Military Installations Fund for a study of a sound attenuation program, the City was turned down and has made no further effort to address the issue. While more empty promises are not wanted, the community needs to understand if any mitigation measures for noise will be considered, what those might be, and what funding might actually be available to implement them. While Pima County has recently proposed to put a future bond issue before the voters to, among other things, establish a new initiative to mitigate adverse noise impacts associated with Air Force overflights, timing and passage of the bond measure is both uncertain and unlikely for a number of reasons. The Air Force must candidly identify those uncertainties along with other possible sources of funding in its next iteration of a DEIS.

One of the few issues for which mitigation is discussed at all locally is for traffic conditions. Under alternative T2, vehicle trips are projected to increase by 10% and under T3 by 18%. Either of these developments would add significant congestion to adjacent streets, but the only mitigation is adjustment of operations schedules and/or additional personnel at the installation gate. (DEIS, p. 2-61). There is no indication that any traffic studies have been done in coordination with Pima County or Arizona Department of Transportation to determine the adequacy of such measures.

In summary, the treatment of mitigation in the DEIS is so minimal and inadequate as to be almost nonexistent. NEPA requires that reasonable mitigation measures be identified and analyzed in a revised or supplemental DEIS and that those adverse impacts that cannot be mitigated be clearly identified at the same time.

NP-33

XV. The DEIS Fails to Include Any Analysis or Even Identification of Process for Relocation of F-16s.

Throughout the DEIS, there are references to the necessary relocation of F-16s from whatever base(s) is chosen for basing of F-35As for training. The discussion implies that the relocation of the F-16s is an interdependent part of the action, triggered by the potential basing of the F-35As. Yet nothing in the DEIS explains to the public why the analysis of this potential connected action is not included in the DEIS, why there is no indication of where the F-16s

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might be moved and whether they would be potentially located in the same area as any of the alternative installations analyzed in the DEIS. The Air Force should explain in a revised or supplemental DEIS whether it considers the relocation a “connected action” under NEPA that needs to be analyzed in the same DEIS per the requirements of 40 C.F.R. § 1508.25(1).

DO-70

XVI. There Were Process Problems with the Public Hearings.

Finally, we want to note several problems with the process associated with the public hearings held in Tucson in regards to the DEIS. As the DEIS notes, almost 45% of Pima County residents are minority populations, the majority of which are of Hispanic origin. (DEIS, TU-119). Also as noted in the DEIS, the number of minority residents who could be affected by the various scenarios range from the 378 individuals identified in the baseline conditions to 7,530 for Scenario T3 (DEIS, TU-119). Further, the DEIS acknowledges that the various aircraft scenarios “would present a disproportionately high and adverse environmental impact on low-income populations.” (DEIS, TU-120). Many of those low income residents are Hispanic. Yet, inexplicably, we are aware of no public notices disseminated in Spanish. When asking for posters, information sheets, and literature in Spanish, a Tucson Forward Director was advised that none were available. Further, the first public meeting in Tucson, held much closer to the potential site of the basing and the lower income neighborhoods than the second public meeting in Tucson, was held on Ash Wednesday, an important religious observance, especially in the Hispanic community. The well-attended, second public meeting was held outside of the City in the foothills area, some 13 miles from the TAGS airport.

EJ-5

NP-28

Another public hearing notice deficiency was evident at the first meeting when the public was informed that the Air Force was also taking comments on the National Historic Preservation Act process (the “Section 106 process”) at the public hearing. There was no mention of taking comments on the 106 process in any of the written notices; indeed, we had no idea this was the case until we heard this comment. Members of the Tohono O’Odaham Nation, archaeologists and others may well have chosen to attend if they had been informed of this. The lack of comments addressing this topic bears testimony to the failure of the Air Force to inform the public that they would be taking comments in regards to this separate legal process.

CU-15

Further, while at least one Air Force representative explained “tiering” to a few people during the information/poster session, there was no discussion of tiering either during the overall remarks nor in the public notices. It is imperative that the potentially affected communities understand the full scope of planned NEPA compliance for these activities. There has been considerable confusion among members of Tucson Forward regarding the relationship of the action alternatives to the no action alternatives and how NEPA and other environmental laws would apply to any future basing decisions not directly resulting from an initial decision based on this particular EIS track.

DO-2

In conclusion, it is apparent that this DEIS was pushed out the door prematurely and inappropriately. The most fundamental aspects of the proposed action – the design and operational capabilities of the F-35A – are yet to be determined. Analysis of the adverse impacts of most concern to the public is deferred until after the decision that this very DEIS is intended to support. Other glaring inadequacies and omissions appear to reflect either carelessness and/or an

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intent to highlight only potential beneficial impacts of F-35A basing (such as economic benefits while omitting adverse economic impacts.) We ask that the Air Force withdraw the DEIS and not go forward with the NEPA process until it has the ability to accurately analyze the impacts of the F-35A in a training mode. Alternatively, if the Air Force chooses to go forward, it must, at a minimum, publish a revised or supplemental DEIS for public review and comment addressing the various deficiencies noted above.

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Sincerely,

Tucson Forward

  
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President

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**Peaceful Skies Coalition**  
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March 13, 2012

**VIA E-MAIL**

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**Re: Comments on the US Air Force F-35 A Training Basing Draft Environmental Impact Statement (EIS)**

To Whom It May Concern:

Peaceful Skies Coalition is submitting comments on the United States Air Force F-35 A Training Basing Draft Environmental Impact Statement in compliance with the National Environmental Policy Act of 1969, 42 U.S.C. § 4331, et seq., (NEPA).

These comments are submitted during the requisite comment period by the Peaceful Skies Coalition (Commenters). The Commenters request that Carol Miller, President of Peaceful Skies Coalition, be placed on the recipient list to receive notice of any developments in the USAF NEPA review process for this proposal and any related documents issued by the USAF in the course of its NEPA review of this proposal. The Commenters further request that these comments be included as part of the administrative record. Additional comments may also be submitted separately by members of this organization, its officers, and other interested citizens associated with the organization. We submit the following comments at this time in order to maintain our standing to challenge in a court of law a decision, which is found to be in violation of the NEPA. NP-7  
NP-8

Other commenters will address flaws in various sections of the DEIS, some of which will be site specific to one or more of the sites under consideration. Peaceful Skies Coalition is primarily addressing serious, fundamental problems with the DEIS and the numerous ways in which it fails to meet the requirements of the NEPA.

**Recommendation: Withdraw the DEIS Document for Multiple Violations of NEPA** NP-13

The DEIS is an insult to the affected communities and makes a mockery of the NEPA process. The public is being asked to comment on environmental impacts of a plane that is still under development. NP-13

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Neither the Department of Defense nor any of the military services participating in the Joint Strike Fighter program have any actual data about the F-35 in any of its variants, including the F-35A. As recently as March 6, 2012 it was reported that a test flight of the F-35 was aborted after 15 minutes as a result of a possible fuel leak. (“Tuesday’s curtailed flight was another setback for the \$382 billion F-35 program, which the U.S. Defense Department is restructuring for a third time to allow more time for development and testing.” Source: <http://www.reuters.com/article/2012/03/07/lockheed-fighter-idUSL2E8E70SR20120307> accessed March 12, 2012) NP-13

This recent fuel leak is only one of hundreds of publicly reported problems with the aircraft in question. Specific details of additional mechanical failures of this aircraft have been documented repeatedly by the Governmental Accountability Office, most recently in May 2011 testimony to the US Senate (GAO-11-677T). The Department of Defense conducted a recent review, which concluded that there was a “Lack of confidence in the design stability ... supports serious reconsideration of procurement and production” *F-35 Joint Strike Fighter, Concurrency Quick Look Review, 2011* (Ahern Report). NP-13

Because no data about the aircraft exists to date, the information provided in the DEIS is premature and therefore invalid. In particular, the data cited in the sections on noise, air quality and safety are pure conjecture based on different aircraft, not the F-35A or its variants.

A serious over-arching problem with the DEIS is the inclusion of four proposed locations in three states and then provides twenty different basing scenarios within the document. No science or independent analysis is provided to demonstrate that this approach can result in a valid outcome. The document fails to establish a baseline that is local, regional, or national. Significant national policy decisions, such as the F-35A Training Basing, cannot be based on a multiple-choice document. Although the DEIS contains a large number of pages, each section is based on the simplistic assumption that the increase in number of aircraft and/or number of flights is linear and that there are no cumulative changes or effects as the numbers increase for any of the various urban and rural proposed sites. DO-55  
DO-71

The Peaceful Skies Coalition is aware that a tremendous military expansion is underway within the United States and that the Air Force and other branches of the military are simultaneously conducting numerous Scoping, Public Hearings, Draft and Final EAs and Draft and Final EISs. In order to provide informed comment on the F-35A Training Basing DEIS, the public needs information about the other current regional and national base changes. Without complete information there is no way to determine any of the actual impacts that will occur from F-35A Training Basing in any of the twenty options proposed in the DEIS. GE-13  
NP-29

The failure to provide complete disclosure is another reason that this DEIS should be withdrawn. The public is being asked to comment on incomplete information. Despite numerous requests for an extension of the comment period, no additional time has been provided. NP-13  
NP-38

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DOD Must Develop a Comprehensive Baseline for All of Its Activities

For the purpose of establishing a baseline from which to address cumulative affects, the Department of Defense (DOD) should initiate a Continent-wide EIS for all military flights and training, whether manned or unmanned, by any and all branches of the military. Wildlife, water and air quality, and avian flyways are just a few of the potentially affected natural systems, which exist in very large bioregions not defined by lines drawn on a map around a single base.

For the third time, the Commenters request that the USAF diligently prepare a comprehensive programmatic EIS for all training areas, operations and activities in at least the lower 48 states and arguably in the Continent, including Alaska.

Council on Environmental Quality (CEQ) policy states that actions which are:  
(1) closely related, i.e., are interdependent parts of a larger action and depend on the larger action for their justification; or (2) are cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts; or (3) are similar actions that have similarities that provide a basis for evaluating their environmental consequences together, such as common timing and geography, need to be considered in one EIS. See 40 C.F.R. § 1508.25. Based on this policy, the numerous training areas and activities, or operations, throughout the western United States, and indeed the entire country, should be considered in one, single programmatic or comprehensive EIS.

Much of the information presented in the DEIS violates this policy by providing no recognition of adjacent activities. Even when a range, such as Goldwater, is shared by the Air Force and Marines, or Tucson and Davis-Monthan, the proposed Air Force activity is effectively considered alone.

Without question, all of the areas proposed in the F-35A Training Basing DEIS are closely related as they involve the same impacts to resources and are part of a larger, programmatic plan to train US and foreign pilots and related military staff within the USAF and the other branches of the DOD. When viewed with other proposed actions, there are cumulatively significant impacts on human communities and wildlife populations and habitat. These projects qualify as “similar actions” that provide a basis for evaluating their environmental consequences together, such as common timing and geography. These projects therefore must be analyzed in one, national programmatic EIS.

Preparing a single comprehensive or programmatic EIS is the only way the USAF genuinely can explore and evaluate a reasonable range of alternatives with varying overflight frequency and alternate locations, as well as alternative methods of training (including virtual flight simulation). Commenters believe the DOD does not want the public to learn all of the negative environmental impacts of its activities. We are aware that at one time the DOD had initiated a programmatic EIS for its entire low altitude training program on a nationwide

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basis, and then abruptly discontinued the process after early administrative drafts revealed the presence of very significant cumulative impacts across the country. GE-13

References and Self-Citation

Despite a sizable number of pages, the document as released is incomplete, inaccurate and overly reliant on old and irrelevant data.

Like other documents developed by SAIC, the air force NEPA “experts,” the F-35A Training Basing Draft EIS is an obvious cut and paste document. Stock references and citations – many decades old - are included, apparently to try to make the document appear convincing and serious. An EPA noise study from 1974 is cited throughout the DEIS, a study now thirty-eight years old! DO-72

Most of the references included are documents produced by the military or other parts of the federal government. None of the DOD self-citations can be considered independent and, in fact, reveal a conflict of interest with the data used for this DEIS. NP-31

Because of the poor quality of the document, it is possible to go through it section-by-section and critique each for flawed data, incomplete data, misrepresentation of fact, and failure to address significant requirements of NEPA. This comment will not do that because Commenters are aware of numerous technical and legal experts who are providing excellent comments on the errors and omissions.

This DEIS is Not in Compliance With NEPA

The USAF is required to comply with all of the requirements of NEPA assuring an independent and complete EIS. The statute requires that the following range of issues must be included and subjected to independent, in depth analysis:

Direct Impacts.

A NEPA-compliant EIS must analyze the direct impacts of the proposed action. This includes but is not limited to: impacts to the health and socioeconomic and psychological wellbeing of Native American tribes, other residents of the area, and all those who live in and visit the proposed impacted areas from within the United States and around the world; impacts to livestock and other domestic animals; impacts to wildlife and wildlife habitat; impacts to wilderness areas, Areas of Critical Environmental Concern, and other environmentally sensitive areas; air quality impacts; impacts to archaeologically, anthropologically, historically, spiritually, and culturally significant areas, impacts to scenic areas, impacts to recreation areas; and impacts to tourism.

Each of the areas under consideration support an abundant and diverse array of wildlife including prime habitat for many species listed as threatened and/or endangered under the Endangered Species Act, and irreplaceable in many respects. F-35A Training Basing is likely to cause irreparable damage to wildlife populations and habitat at each of the proposed locations. The DEIS fails to fully describe these potential threats or any mitigation plans to eliminate or limit the threats. BI-2 BI-6 NP-33

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Because of the extent of the terrain to be affected, detailed independent, current analysis must be done for each proposed locality as well as each bioregion/ecosystem. BI-2

Indirect Impacts.  
 The NEPA review process is required to carefully analyze the indirect effects of the proposed action. Indirect effects are effects that are caused by the action but occur later in time or are further removed in distance. See 40 C.F.R. § 1508.8 (b). Indirect effects “may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.” *Id.* Here, the indirect effects shall include, but are not limited to, negative socioeconomic impacts, environmental injustice impacts, and the negative impacts to tourism, public health, hunting, and recreation that will result from the proposal.

The effects on the real estate market, both home and land values, could be devastating and, although raised repeatedly at the community meetings, are inadequately addressed in the DEIS. SO-1

Cumulative Impacts.  
 The Commenters find that absolutely no attention was seriously paid to identifying or analyzing any cumulative impacts in the DEIS. In fact, this failure to consider cumulative impacts was one of the weakest parts of the document provided to the public. It failed to take into account the requirements of cumulative impacts analysis in settled case law, regulation and policy.

The Federal courts have ruled that the government “cannot isolate a proposed project, viewing it in a vacuum.” However, this is exactly what the Air Force has done with the F-35 Training Basing Draft Environmental Impact Statement. Twenty separate scenarios are presented in a vacuum, isolated one from the other as well as from adjacent or shared airspace and/or range. This failure to address cumulative impacts supports the request by the Commenters that the current DEIS be withdrawn and a document in full compliance with law and policy be developed. CM-6

The NEPA review process requires taking a hard look at the cumulative impacts of the proposed action. A cumulative impact is “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” 40 C.F.R. § 1508.7.

With respect to the proposed F-25A Training Basing, properly analyzing cumulative effects must include: (1) identifying the significant cumulative effects issues associated with the proposed action; (2) establishing the proper geographic scope for the analysis; (3)

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establishing an appropriate time frame for the analysis; and (4) identifying other actions affecting the resources, ecosystems, and/or human communities of concern.

In this case, establishing the proper geographic scope or boundary for a cumulative impacts analysis is extremely important because the proposed action will have direct, indirect, and “additive” effects on resources *beyond the immediate* area. To determine the appropriate geographic boundaries for a cumulative effects analysis, therefore, the USAF environmental analysis should first: (1) determine the area and resources that will be affected by their proposed action (the “project impact zone”); (2) make a list of resources within that area or zone that could be affected by the proposed action; and (3) determine the geographic areas occupied by those resources outside the immediate area or project impact zone. In most cases, the largest of these areas will be the appropriate area for the analysis of cumulative effects. By way of example, for resident or migratory wildlife, the appropriate geographic area for the cumulative impacts analysis will be the species habitat or breeding grounds, migration route, wintering areas, or total range of affected population units. See *e.g.*, *NRDC v. Hodel*, 865 F.2d 288, 297 (D.C. Cir. 1988).

Another important aspect of a cumulative impacts analysis that the USAF will need to consider is an assessment of other past, present, and reasonably foreseeable actions affecting the resources, ecosystems, and/or human communities of concern. According to the CEQ, the “most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time.” Council on Environmental Quality, *Considering Cumulative Effects Under the National Environmental Policy Act 1* (January 1997) available at <http://ceq.hss.doe.gov/nepa/ccenepa/ccenepa.htm> (last visited November 2, 2011). The requirement to consider cumulative impacts, therefore, is designed to avoid the “combination of individually minor” effects situation – to avoid the “tyranny of small decisions” or death by a thousand cuts scenario. See *e.g.*, *Grand Canyon Trust v. FAA*, 290 F.3d 339, 346 (D.C. Cir. 2002). CM-6

The USAF must conduct a NEPA review that takes into account and analyzes state, private, and other federal actions as well as natural occurrences or events that have taken place, are taking place, or proposed to take place that will similarly impact the region’s wildlife populations and habitat, and human communities. Individually, each flyover – though serious – may not rise to the level of posing a significant risk. Collectively, however, the impacts of all of these and other activities – whether conducted by private individuals, state agencies, or other federal agencies – may be significant and must be analyzed. See *e.g.*, *Grand Canyon Trust*, 290 F.3d at 346 (discussing collective impacts to Zion National Park); *NRDC v. Hodel*, 865 F.2d 288 (D.C. Cir. 1988). As the D.C. Circuit Court noted, federal agencies must “give a realistic evaluation of the total impacts [of the action] and cannot isolate a proposed project, viewing it in a vacuum.” *Grand Canyon Trust*, 290 F.3d at 342. Even “a slight increase in adverse conditions . . . may sometimes threaten harm that is significant. One more factory . . . may represent the straw that breaks the back of the environmental camel.” *Id.* at 343 (quoting *Hanly v. Kleindienst*, 471 F.2d 823 (2d Cir. 1972)).

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The USAF cannot analyze the direct and indirect effects of the proposed F-35A Training Basing in isolation, but must examine the cumulative effects of the proposed project together with all other Department of Defense training areas and operations in and around New Mexico, Idaho, Arizona and all adjacent states. As explained below, this comprehensive analysis is required by NEPA and mandates the preparation of a programmatic EIS that addresses the entirety of training programs.	CM-6 GE-13
<u>Establish a Baseline.</u> The USAF NEPA review process has not established in this DEIS a proper baseline upon which to base its impacts analyses and conduct the requisite “trends analysis,” i.e., an assessment of the environmental impacts of all activities affecting the various resources over an extended period of time. By failing to properly define the baseline and from the baseline engage in a trends analysis, the USAF will be unable to track any effects and changes that will occur over time. At a minimum, baseline data on locations of wildlife and migratory bird paths, and the current exposure of animal populations and human communities to sudden heightened noise levels is needed in order to properly analyze the impacts (direct, indirect, and cumulative) of the proposed action.	DO-55 BI-23
<u>Alternatives.</u> The USAF NEPA review process will need to consider a reasonable range of alternatives. Under NEPA, federal agencies must “study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” 42 U.S.C. § 4332(2)(E); see also 40 C.F.R. § 1508.9(b). The discussion of reasonable alternatives section is the “heart” of any environmental analysis under NEPA. 40 C.F.R. § 1502.14. This standard has not been met.	
<u>Meaningful Public Comment.</u> The goal of the NEPA review process is to “provide full and fair discussion of significant environmental impacts [of a proposed action]” and to “inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.” 40 C.F.R. §1502.1. With this mandate in mind, and in order to enable meaningful public comment, the USAF NEPA analysis for the proposed Training Basing needed to be well organized, easy to read and understand, and include proper references and citations to all relevant scientific studies and data.	GE-18
Dissemination of the Draft EIS to the public was minimal. Some, but not all of the libraries and post offices in the area, were provided a single copy. Publicity of the locations of these copies was so minimal as to be effectively nonexistent. Public notice for so-called “community forums” was also effectively nonexistent.	NP-41 NP-14
<u>Best Scientific Information.</u> All agencies, including the USAF “shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements.” 40 C.F.R. §1502.24. Information “must be of high quality.” 40 C.F.R. § 1500.1(b). Accurate “scientific analysis [is] essential to implementing NEPA.” <i>Id.</i> The	NP-42
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USAF failed to review and collect sufficient scientific data. Much of the data is old and/or unrelated to the specific project. This resulted in a Draft EIS that does not provide information sufficient to analyze the direct, indirect, and cumulative impacts of the proposed action.	NP-42
Topics for study, which were not addressed at all include watershed impacts from accumulated perchlorates and other jet fuel pollutants, fire danger in drought-ridden forests, effects on wildlife as well cattle and ranching. Additionally effects on current and future eco-tourism and renewable energy development must be studied.	HW-1 SA-9 SA-4 BI-2 SO-7 SO-18
<u>Socioeconomic Factors and Environmental Justice.</u> The preceding pages document a number of weaknesses and violations of statute, regulation and policy. The Draft EIS fails to establish a baseline, fails to consider cumulative impacts, and presents very limited science regarding potential impacts to humans or natural systems. Despite these significant, overall shortcomings, no section is as dismissive of impact as the Socioeconomic and Environmental Justice sections, either find no potential impacts on the affected human communities or disclose impacts with insufficient provision for mitigating the impacts.	SO-23
The Commenters are in support of the excellent study prepared by Kevin E. Cahill, PhD, <i>Expert Economic Assessment of the USAF Socioeconomic Impact Analysis for Boise AGS</i> , March 3, 2012. This study was previously submitted as comment to this DEIS and Dr. Cahill also testified at the Boise meeting. The public is grateful to Dr. Cahill for the amount of research that forms the basis of his thirty-page comment. Cahill states that, “the Air Force’s socioeconomic analysis is not reliable or informative in any way,” concluding, “The socioeconomic analysis contained in the Air Force’s Draft F-35A Training Basing Environmental Impact Statement is fundamentally flawed and grossly insufficient.”	SO-23
While Cahill wrote the report specifically to the Boise option, the underlying research and analysis applies to all of the scenarios. Cahill’s critique of the IMPLAN model used by the Air Force and the DEIS failure to consider quality of life, lost productivity, impacts on learning at affected schools, property values and other economic impacts applies to the other proposed communities as well.	SO-13
A comprehensive study of socioeconomic and environmental justice impacts is needed at the county level as well as at the regional market/services level, many of which cross state and county lines.	SO-46
These comments are submitted on the USAF F-35A Training Basing Draft Environmental Impact. The mission of the Peaceful Skies Coalition is to participate in this and other important decisions affecting public resources in United States.	
In conclusion, we ask that this Draft Environmental Impact Statement be withdrawn and that the DOD first complete an EIS for all continental low, middle and high altitude flights both manned and unmanned for all DOD branches. We believe the public will be outraged to learn how much airspace, how many flights, how much pollution, and how much money is literally burned	NP-13 GE-13
8	

2168 XX

overhead by the DOD and that the public will demand that military airspace and training contract and not expand.

GE-13

We hope you find these comments to be helpful, informative, and useful in your efforts to comply with the NEPA and other substantive statutes. If you have any questions or comments, or wish to discuss the issues raised in this comment on the F-35A Training Basing Draft Environmental Impact Statement in greater detail, please do not hesitate to contact the Peaceful Skies Coalition representative listed below.

Sincerely,



Carol Miller, President

On *Behalf* of:

Peaceful Skies Coalition  
P.O. Box 322  
Arroyo Hondo, NM 87513

2169 XX

**From:** Ryan Owens [ROwens@az.gov]  
**Sent:** Wednesday, March 14, 2012 1:59 PM  
**To:** AETC/A7P Workflow  
**Subject:** Governor Jan Brewer Statement for F-35A Draft EIS Public Comment Period  
**Attachments:** GovJanBrewerF-35Acomments.pdf

Dear Sir or Ma'am,

Attached are Arizona Governor Jan Brewer's official comments for the F-35A Draft EIS. The hard copy of this statement has been postmarked today, March 14, 2012 to comply with the deadline for comment submittals for the Draft EIS public comment period.

Thank you for your time and consideration in this matter.

Respectfully,

Ryan Owens  
Assistant Policy Advisor  
Office of Arizona Governor Janice K. Brewer  
1700 W. Washington  
Phoenix, AZ 85007  
602-542-1437  
[rowens@az.gov](mailto:rowens@az.gov)



STATE OF ARIZONA

JANICE K. BREWER  
GOVERNOR

EXECUTIVE OFFICE

2169 XX

March 12, 2012

Kim Farnoff  
Air Force Contractor  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX 78150-4319

Dear Ms. Farnoff:

I write this letter with the utmost appreciation and respect for the diligent and worthwhile efforts of the Air Force during the F-35A EIS process. A decision of this magnitude deserved every second of the attention it received.

The State of Arizona welcomed the initial announcement in July of 2010, naming Luke Air Force Base as the preferred alternative training installation to receive the F-35A. Our enthusiasm intensified when the Air Force, in the same announcement listed Tucson Air Guard Station as a candidate to receive future F-35As. I was proud to see the hard work of our elected officials, coupled with the tremendous support of community groups to protect our military installations, recognized in such a significant manner.

From the Scoping process to the current Draft EIS public comment period, we have maintained that Luke AFB and Tucson AGS are the best candidates for future F-35A training assignments. I am confident no other state can provide the same level of legislative protection and municipal support provided by the State of Arizona. Additionally, with 350 days of clear skies, perfect flying conditions and the range capacity to support these missions, Arizona is the ideal location to host the F-35s.

The Draft EIS speaks volumes about the high level of support for military installations in Arizona. The State welcomes the F-35A mission, and commits to protecting it as they have done with past and current missions.

1700 WEST WASHINGTON STREET, PHOENIX, ARIZONA 85007  
602-542-4331 • FAX 602-542-7602

2169 XX

Kim Farnoff  
March 12, 2012  
Page 2

Consistent with all department policies, guidelines, and regulations, I respectfully request that the F-35A training mission be placed in a state which will welcome it, protect it, and honor it. That state is Arizona.

GE-3

Sincerely,

*Janice K. Brewer*  
Janice K. Brewer  
Governor

GE-3

# BetaData

2170 TU

David Martin  
Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Bldg 901  
Randolph AFB, TX 78150-4319  
Email: [aetc.a4cp.inbox@us.af.mil](mailto:aetc.a4cp.inbox@us.af.mil)

I am writing you in support of locating the F-35 Pilot Training Center at Tucson International Airport. I am nearly 69 years old and other than business travel and assignments, have lived in Tucson all of my life. I am a private pilot who flies out of Tucson International Airport and I deal with many of the governmental agencies including the Tohono O'odham Nation west of Tucson. I live in the center of the city, near the University of Arizona.

I would urge that among the hysteria raised by some in our community that you please remember the values of locating pilot training in this area. Clear skies - well over 330 days a year, generally good flying weather, topography and desert environment similar to where most of the current strife is in the world, and an excellent facility at Tucson International Airport. The flight operations at both TIA and Davis Monthan are not a hinderance in normal flight operations as the aircraft traffic in this area is minimal compared to other metropolitan areas. I do not recall when military flight training was not occurring here. Even the commercial airlines train pilots in this area. The reasons are plentiful and clearly beneficial to those making the decision to locate here.

There are a few in our community that oppose the location of the F-35 Pilot Training Center at Tucson International Airport. Many of the leaders are in my neighborhood – far removed from any impact that flight operations will have on the neighborhoods, yet they write with concerns over noise and crashes. I am dealing with the same folks on a major project I am running for Pima County. They have no basis for their concerns, but need a cause to vocalize on. While it is important to listen to everyone as a part of the EIS, remember that there are specific facts and benefits supporting the location of the facility at TIA and I urge you to favorably consider that decision.

Sincerely,

*John H. Moffatt*

John H. Moffatt, Ph.D.  
President

2171 TU

**From:** David Lovitt [david@dmlovitt.com]  
**Sent:** Wednesday, March 14, 2012 4:46 PM  
**To:** AETC/A7P Workflow  
**Subject:** support of the F-35A Training Basing

Please include this email as indication of my complete support of the F-35A Training Basing in Tucson Arizona. ] GE-3

David Lovitt, President



607 N 6th Ave, Tucson AZ 85705  
(520)798-1888 ext. 16  
(520)884-8900 fax

2172 BO

From: Senator Elliot Werk [mailto:elliotwerk@gmail.com]
Sent: Monday, March 12, 2012 9:56 PM
To: AETC/A7P Workflow
Subject: Comments on the Draft F35A EIS for Gowen Field



ELLIOT WERK
IDAHO STATE SENATE

Sir/Madame:

I am the state Senator representing the area north of I84, west of Vista, and east of the I84/I184 interchange in Boise, Idaho. I have reviewed the draft EIS for the F35A and consulted with knowledgeable individuals in the area. I have also attended your public meetings and held a public meeting of my own with Air Guard representatives from Gowen Field for my constituents to discuss the F35A process.

Other state leaders have expressed support for the F35A deployment at Gowen. However, they have far less at stake than I since I represent families located within the area of the most severe noise impact. Other leaders have peripheral impacts at best.

Based on these discussions I believe that the sound study aspects of the draft EIS for Gowen Field is deficient and must be completely reworked. We must have a better indication of the real impact of the F35A in our area if we are to adequately understand the impact to our quality of life. Based on the information in the EIS I would judge Boise to be an inappropriate venue for the F35A mission. The F35A is not an urban machine. The noise impact is far too severe in a closed valley like ours to provide an acceptable level of impact to the 200,000 plus individuals that live in the city of Boise.

The area that I represent is disproportionately impacted by the potential deployment of the F35A and I would like you to understand that I oppose this deployment based on my study of the issues and the comments that I have received from my constituents. I would ask that you drop Gowen as a potential deployment site for the F35A until such time as you can completely mitigate the impacts on noise in our valley. This may be accomplished through the construction of a new runway at Gowen Field located at least 1.5 miles south of the current runway.

As I am sure that you are aware, a group (saveourvalleynow.org) has sprung up to oppose the deployment. You might not be aware that the area of greatest impact includes the homes of some very prominent people in Boise that have the means to ensure a long and costly court battle should the F35A come to Boise. I have been

2172 BO

discussing these issues with individuals in the greatest area of noise impact and witnessed their resolve in this area.

Below is a collection of comments submitted to me from the residents in my district. I ask you to enter these into the official record along with my own comments above.

Thank you for your consideration.

Elliot Werk, State Senator
Boise's District 17

##### Corresponds to A1082 BO

To The Honorable Senator Elliot Werk:
A web-based comment was submitted by:
Name: Janet Kirkhart
Address:
City/State/Zip:
Phone: Ext.:
Email Address:
Concerning: F-35 Training Base at Gowen Field
With the following comments:

Hello Senator Werk,
I sat next to you at the Air Force Hearing on Feb. 28th. It was very informative and as our local representative, I was happy to see you in attendance.

As a resident of Boise for 23 years, I am writing to voice my opposition to the proposal to bring F-35 training to Boise.

We have lived in Columbia Village for over 20 years. Our current home would be within the boundaries of the restricted area. I am very concerned for not only my families quality of life, but the negative impact this would have on the entire TV, and beyond.

The EIS is full of gaps and the economic impact has not been studied. At the hearing it became more clear to me that the well paying jobs will be military jobs, NOT ones for our residents, let alone our sons and daughters. Additionally, goods and supplies purchased on base, are not subject to State and Local Tax. The majority of those stationed here would (likely) live on base and not purchase homes. The (small) percentage who do buy, will not necessarily (or even likely) buy them in Boise.

It's entirely possible that this could actually be not truly for the benefit of, but at the expense of Boise. Thank you.

##### Corresponds to A1077 BO

To The Honorable Senator Elliot Werk:
A web-based comment was submitted by:
Name: G Ellinghouse
Address:
City/State/Zip:
Phone: Ext.:
Email Address:
Concerning: F-35 Disaster
With the following comments:

Dear Senator Werk,

2172 BO

I have never before been interested enough in politics to make my voice heard until now. I feel this is a life-changing issue for residents of the Boise Valley. After doing my research on the possibility of the F-35 aircraft base being located at Gowen Field, I can say I am completely outraged! People live in Boise for the "quality of life" here. People move here and visit here for our "quality of life". If this project is approved and comes to pass it will thoroughly destroy the quality of life here in Boise. Do you want your children breathing raw jet fuel that has not been burned off? Do you want your children awakened and frightened every hour of the night and day from deafening noise? Do you want your children suffer from hearing loss from dangerous levels of noise? Do you want your children's daycare and schools to be so noisy they can't concentrate or rest? Do you want your families sleep to be disturbed night after night? As you have probably guessed, I live and work in the area that will be deemed as "not suitable for residential use". I am a mom, a wife and a prekindergarten teacher. Furthermore, my husband is a school administrator at a school that also lies within this boundary. As you can see this is going to affect my family 24 hours a day 7 days a week. Maybe you don't live within this boundary and it won't affect you personally, but please don't be so short-sighted to support this just because it won't be happening in your backyard.

Yes, on the surface, 25,000 (supposedly) new jobs coming to our community sounds great, but let's think that through first. We do not have trained personnel in the valley to work on these aircrafts. People moving here to take these jobs will not buy in Boise because they will already be well-versed in the exorbitant noise level, air pollution and health risks associated with the F-35's. They will buy somewhere else like Caldwell. This will further add to the demise of the real estate market here in Boise, since the f-35's will have caused our property values to tank. The fact that the Air Force will buy my home that I have lived in for 10 years and is the only home my children have ever known for a mere \$14,000 is a cruel, cruel joke.

Don't let this be the end of Boise as we know and love it. I feel this has been kept quiet by the powers that be. Please help get the message out there to the people whom it will adversely affect for a long time. Don't allow this travesty to happen on your watch.

Sincerely, Gina

##### [Corresponds to A1003 BO](#)

Mr. Martin and Ms. Fornof,

Thank you for the opportunity to comment.

I'm a resident of Boise, not far outside the lines of greatest impact that have been drawn in the F-35 EIS for Gowen Field. My daughter and grandchildren live under one of the current jet flight paths south of Boise. We know what today's generation of jets sound like.

I believe that the interface between airfields and residential neighborhoods is too immediate to accommodate any deployment of advanced military fighter jets in Boise. I oppose the current F-35 proposal.

Sincerely,  
Darcy James,

##### [Corresponds to A1076 BO](#)

To The Honorable Senator Elliot Werk:  
A web-based comment was submitted by:  
Name: David Crawford  
Address: [REDACTED]  
City/State/Zip: [REDACTED]  
Phone: () - Ext.:

Email Address: [REDACTED]  
Concerning: We Oppose the F-35A Training Base at Gowen Field Idaho  
With the following comments:

2172 BO

March 1, 2012 Subject: We Oppose the F-35A Training Base at Gowen Field Idaho Good Day, Based on the Air Force's Environmental Impact Statement, (EIS), 72 F-35A aircraft operating out of Boise would expose 6,958 acres of property to so much noise that the area would be designated by FAA regulations "Not Suitable For Residential Use". This affects over 10000 residents of the City of Boise and Ada County. It adversely affects our health, our quality of life and property values. My wife and I live in this area of impact and we believe that Gowen Field is not suitable for a training base due to the following: Noise Pollution. 10000 residents will be subjected to Noise in excess of 65 dB DNL. this creates a large area that according to the FAA is "Not suitable for Residential Use". This affects our health and our quality of life. This could have a negative effect on nearby industries such as Micron Technology. If the increase in noise affects the quality of their products due to increased vibration, they could pull out of Boise. The Noise level would affect the learning ability of students at Hillcrest and Owyhee elementary schools as well as West Junior High and Frank Church High school. Noise due to 1400 night training missions/year would affect the health of the 10000 people within the affected area by interrupting their sleep. Air Pollution. The Boise valley already has borderline Air Quality. The addition of the large number of F-35A jets will have an adverse effect on our air quality, particularly for those adjacent to Gowen field. Also of concern would be the dumping of aviation fuel in the atmosphere. Property values for those close to the airport will go down, both for residential and commercial property, due to the increased Noise and air pollution. If Gowen Field was going to be an Air Force Base, residential and commercial development should have been Banned from the time that it was established in 1938. By allowing residential development and commercial operation.

With Mtn Home Air Force base just 40 miles away and with all of the facilities they have as a full Air Force Base, why wouldn't this be the sight for both an operational and a training base?

Thank you for the opportunity to respond,  
David Crawford [REDACTED]

##### [Corresponds to A1073 BO](#)

To The Honorable Senator Elliot Werk:  
A web-based comment was submitted by:  
Name: MARC CLARK  
Address: [REDACTED]  
City/State/Zip: [REDACTED]  
Phone: [REDACTED] Ext.: [REDACTED]  
Email Address: [REDACTED]  
Concerning: Air Force F35A training at Gowen Field  
With the following comments:

I am completely opposed to the use of Gowen Field airport in The Capital city of Boise Idaho, as a base for the Air Force F35A Training. The excessive noise generated by the aircraft is the problem. The disturbing sound level and just the general "roar" are not confined to the impact area. The sound carries for tens of miles and lasts minutes on end. The current A-10's that fly out of Gowen Field are as loud and aggressive as any Military planes should be in the proximity of our city. Please remember that this is a civilian community and the Capital City of our state, not a military base. I do not foresee any benefit coming to The City of Boise from this endeavor. To the contrary, I am assured a loss of quality of life by the constant long term noise disturbance. The job creation will be minimal and civilian contracts will be short term and limited. I work, and when I come home; I would like some peace and quit. I cannot afford (nor do I want) to be forced to leave my home in Boise in order to enjoy some relatively quiet time. Let us maintain our community's quality of life and desirability as

2172 BO

a destination by keeping it free of excessive and overburdening noise that travels far and wide in this topographic environment. People and businesses will not flock to Boise to see and hear F35's ! They will come (and stay) for the serenity, outdoor opportunities, quality of life and the business environment. NO - to the F35A at Gowen Field, Boise Idaho

Thank you, Marc Clark

##### Corresponds to 1663 BO

To The Honorable Senator Elliot Werk:
A web-based comment was submitted by:
Name: Brad Emery
Address:
City/State/Zip:
Phone: () - Ext.:
Email Address:
Concerning: Stop!! the F-35's
With the following comments:

My name is Brad Emery, resident in the Boise Valley for over 12 years. This evening I attended a meeting in my area concerning the placement of the F-35 aircraft base. Words cannot express how disturbing this concept is to myself and all my neighbors considering the effect of it would have on my home for myself and children. This whole concept has been very poorly presented in my area. Everyone has been very minimally informed until it seems this week finally showing people where they can receive more information on the topic. Suddenly our whole community feels like our hands are tied in actually having an influence on the future of our city. As the eis statement is presented I feel as though we are being lied to on the effects this will actually have once completed. At the meetings everyone cannot make any sense of why the most densely populated area in Idaho would be ideal for this placement. I can't complete a conversation on the phone in my home when a f16 flies over and these are reported to be 4 times louder. I honestly dont understand how we could be expected to live in such an extreme condition that the f35 would create over our homes. I Plead that this base is not placed in my neighborhood to ruin my home life as I know it.

I know you would like us to believe that it is worth it because of the "Jobs" that it will bring... What about the jobs that will leave and the companies that will not come because of it! Please help us to keep this from happening to our wonderful valley!

Brad Emery

##### Corresponds to 1753 BO

To The Honorable Senator Elliot Werk:
A web-based comment was submitted by:
Name: kayleen zupkow
Address:
City/State/Zip:
Phone: Ext.:
Email Address:
Concerning: F35 Boise
With the following comments:

Please come and represent the citizens of Boise and help us stop this contract for F35's from coming to Boise. The impact would harm us and our children. We would never be able to sleep and our property values would be worthless. Please help protect us.

Saveourvalleynow.org

2172 BO

##### Corresponds to 1752 BO

Dear Senator Werk, Representative Chew, and Representative Killen,

After reviewing the U.S. Air Force draft EIS regarding a proposed F-35A Aircraft Training Base at Gowen Field in Boise, Idaho, I am extremely worried about how much the quality of life for those who live in Idaho will suffer. In addition to the noise pollution issues which are extremely significant, I am also very concerned about the pollution and air quality issues that will affect all of Ada County and parts of our wilderness areas.

Certain scenarios in the draft EIS (which are using 2009 estimated numbers and don't reflect true current conditions) increase emissions of air pollutants up to and sometimes exceeding Ada County's current PSD and conformity thresholds established by NAAQS. In the Treasure Valley we already have issues with air quality (intensified by wild fires in the summer and inversions in the winter) that we work very hard to control. The addition of the F-35A training base would only exacerbate and accelerate the problems.

The draft EIS states, "For Boise AGS, the main effect of climate change to consider is increased temperatures ... This report predicts that in the future, higher temperatures in the northwest region (1) will increase droughts and wildfires and (2) will reduce springtime snow packs, summer stream flows, and water supplies." This is not what Idaho needs.

In addition, the projected F-35A training routes and areas "are either in close proximity to or overlie pristine Class I areas, including the (1) Jarbidge Wilderness Area, (2) Sawtooth Wilderness Area, (3) Hells Canyon Wilderness Area, and (4) Selway-Bitterroot Wilderness Area." The people of Idaho love and truly enjoy our wilderness areas and they are considered an important part of the Idaho way of life. When I'm camping in the Sawtooths or rafting in Hells Canyon, the last thing I want to see when I look up is "brown-colored haze" or "plume blight." I'd rather see an eagle flying in the clear blue sky or and millions of stars late at night. The draft EIS states the visibility impairment would only occur during the colder months of the year (winter) and in the warmer months of the year (summer) and considers these "inconsequential air quality impacts." I find their depiction of visibility impairment in our wilderness areas very consequential and unacceptable.

There does not appear to be adequate information, if any, in the draft EIS as to how the Air Force would attempt to mitigate these occurrences. It just states "Additional measures would be needed to mitigate these occurrences."

I do not believe the anticipated jobs or revenue the training base may bring to the valley outweighs all terrible consequences and problems it will definitely bring to the valley and all of Idaho. Therefore, I respectfully submit that Boise's Gowen Field is not a suitable location for an F-35A training base and, as such, should be removed altogether from the list of prospective sites.

Sincerely,

Caralea Hopingardner

##### Corresponds to A1091 BO

I am vehemently opposed to the current proposal to allow F35 Fighter Jets at Gowen Field. I am a residential property owner and small business owner/operator in the Vista/Orchard area.

Thank you, Stacey Sullivan

##### Corresponds to A1071 BO

I am writing to express my opposition to having the F-35 jets at Gowen Field. I find the claims that the noise will not be an issue laughable, and the the claims that millions of dollar that will flow into the State/City to be dubious at best. I have often found that a decision that will make you money is not necessarily the right decision. I love living in Boise in my house on the bench and am all for things that will improve the City. This is not one of them.

Sincerely, Jamie Bothwell

2172 BO

##### **Corresponds to A1074 BO**

Team 17,

Thank you for asking my input on the F-35A issue. And, thank you Senator Werk for attending the public hearing on Tuesday evening.

Among the numerous testimonies at the United States Air Force public hearing on Tuesday, February 28, 2011 at least one was very compelling and can be found at <http://www.saveourvalleynow.org/>. This assessment paper from Dr. Kevin E. Cahill, PhD pointed out flaws in the USAF EIS draft which merit scrutiny. Another testimony highlighted that the USAF presented only beneficial aspects of an F-35A training base at Gowen which biased decisions in support of the proposal.

It appears the EIS must be more comprehensive in scope for one to make an educated decision. Until that occurs count me against an F-35A training base at Gowen Field in Boise.

Ron Clayton

##### **Corresponds to A1072 BO**

We fully support the addition of Air Force F-35's at Gowen Field. As homeowners who have been financially devastated by the economics/housing decline in Boise, the trade off of "noise" for a huge injection of jobs, services, additional spending, support, and all the trickle down that would come to our area with such a placement, is well worth it. For many years we lived 1/4 mile away from the runways of one of the busiest airports in the world. Property values never went down from "noise" even though the amount of air traffic increased significantly every year we were there. The values climbed, even beyond that which we could no longer afford. The "noise" lasts for a very short time. It seems you have painted a picture of nothing but declining values and endless noise. That is a biased, narrow forecast and surely intended as such, no surprise there. For most people, "noise" such as close-by airports, freeways, etc becomes background/secondary, and to the point of almost not noticeable(such as all the speeders that far exceed the posted speed limit 24/7 outside our house). You will find virtually every home lived in along the interstate and within the proximity of the airport. That "noisy" international airport we lived next to provided a good job for us, and thousands of others. And even today, Gowen Field provides good employment for one us,( even to the point of helping us keep our home), our adult son, and hundreds more. The addition of F-35's would do the same for many more.

The sound of freedom has been, along with the sacrifice and service of those who choose to provide us(you and I) with that freedom, always welcome to us.

Sincerely, Dave & Siri Christman  
On the Bench Boise, Id

##### **Corresponds to A1084 BO**

To Whom It May Concern:

Unfortunately, I will not be able to attend any of the meetings regarding the F35's. I would, however, like to it to be known that I am absolutely opposed to this! The noise would be unbearable. We have enough noise pollution as it is. Whenever the military jets are in our area, our windows rattle, the sound is deafening, and even our dog is upset. Since I work at home, this would be beyond irritating. Also, I notice that when the military jets are practicing in our area, the regular airlines seem to fly right over our house. I would not have

2172 BO

bought a house under any flight pattern and never intended to live like this. I am not only concerned about the deafening sound but also the safety of residents in our area.

Emilie LaMarche

##### **Corresponds to A1078 BO**

I already feel that there is too much noise on the Bench. Have you listened about nine at night, through closed doors; pretty bad for a QUIET TIME of the day. Any thing that adds to more noise pollution here on the bench, I do not welcome. I'm not even that close to Gowen.or the freeway(though we seem to be on helicopter path).. I live near Kootenai and Orchard!

##### **Corresponds to A1083 BO**

Greetings

We have very happily lived at [redacted] for the past ten-plus years. Living parallel to the airport with the east-west runway, I knew what I was getting into when purchasing here. I didn't, however, count on the possibility of being directly UNDER take-off and landings. With the new F35s this is a distinct possibility. Two years ago we spent \$18,000 to triple-pane windows in our residence, the cost of more comfort and to maintain the value of our investment in our residential property, which seemed a reasonable expense. No amount of window enhancement will be able to buffer what might be going directly overhead caused by these fighter planes, which was something we couldn't have anticipated.

We are curious as to why, with Mountain Home so close, and with the existing runways there, that location is not being used instead of our urban Boise location? Why not add more runways there? Surely they knew what kind of impact this would have on our community. Even in Mountain Home they have the good sense to locate their fly zone far outside of the city limits.

The proposed north-south route from Gowen Field will devastate the value of our property. I have made a point of living modestly and within my means, including not overpurchasing on my home. I take care of, and pride in, my home. I like my neighborhood and most of my neighbors. I pay my bills and my taxes and vote each and every time. Boise is not a military base community. As much as we appreciate what the National Guard has done for us, this was not what we had planned for this community and neighborhood many years ago.

We are not, I repeat not, anti-military.

Only time will tell how the three of us who live in our home will be impacted health-wise, and by that time whatever damage there is will have already occurred. Lord only knows what will happen to the children attending school right across the street from us.

In this economy, selling and moving to a home located out of the proposed flight path is unrealistic and would be financially devastating to us.

We hope to make it to the hearing on Vista tomorrow evening. If we can't make it, please take note of how we feel about this issue.

Sincerely, Connie, Leman and Inez Messley

2172 BO

##### **Corresponds to A1075 BO**

We are out of town and unable to attend the meeting BUT we are in favor of the F35's to be stationed at Gowen Field and Mt. Home AFB. We live on the Bench and would welcome the sound and visual of this amazing aircraft. Also, economic impact out ways the "noise" generated by the aircraft. We find these complaints humorous at this time, because we are on a Navy base watching the Blue Angels train for the winter. Will leave after their show to see the Thunderbirds. Noise? You bet. Every morning at approximately 0800 or earlier. WE love it!!!!!! Go F35's.

John and Cami Conners  
Boise Idaho.

##### **Corresponds to A1070 BO**

Dear Team 17,

My entire family, many of whom are residents in your district, are adamantly opposed to the F-35 project at Gowen. Many of us plan to write letters, I am sending mine tomorrow.

Unfortunately I am unable to make the meetings, but will do all I can to encourage people to write letters and attend.

Please do all you can to help stop the inevitable destruction of home values and quality of life for so many Boise residents.

Thank you, Adam Carter

##### **Corresponds to A1088 BO**

Dear Team,

Absolutely keep them out. The recent four days of jets flying right over the urban Boise area demonstrate that the military has no hesitation to impinge on our quality of life. I know there are a lot of people who phrase this issue as one of patriotism and tell us to just shut up. It defies logic, however, to turn a city, indeed a whole valley, that has been working to elevate itself into an attractive national center for high quality life style and business formation into a noise pit.

Noise is something that a person cannot escape. A person cannot "choose" to not hear it, and these jets create sound on a level unknown to the natural world and which intrudes itself into every corner of one's life. There is no urban sound that comes close to the intensity and bone rattling, mind numbing sound of these jets.

Here's a thought: pornography, which conservatives so detest, has less impact on their daily life than these jets will on everyone's, because a person can easily choose to keep it out of their personal life. And while the sound may stir some to patriot spasms, unfortunately the rest of us have no choice in the matter.

Once they are here, they are here for a very long time. What recourse would we have? If they fly over the city, how can we stop it? Will they keep them over the desert and agree that Boise is a No Fly zone? Let Mountain Home have them.

Please don't be wimpy on this issue!

*Carl Rowe*

##### **Corresponds to 1699 BO**

Dear Senator Werk, Representative Chu and Representative Killen,

2172 BO

I am very much opposed to the Air Force's proposal to bring F-35 jets to Boise. The fact that a large residential area would be deemed incompatible for residential use because of the noise levels above 65 dB DNL makes this proposal unacceptable. The proposal states that the increased noise levels would be annoying, cause classroom impacts, increase the risk of hearing loss, and cause sleep disturbances. Residents living in or near this area would also be affected adversely by the negative impact on their property values.

While the Air Force identifies four schools and thirteen day care centers within the >65 dB DNL area, there are several more schools, including Boise State University, Garfield Elementary, White Pine Elementary, Timberline High, Trail Wind Elementary, Les Bois Junior High, Riverside Elementary, Whitney Elementary, Monroe Elementary, South Junior High, Sage International School, Lakewood Montessori, and several day care centers that are barely outside this area. The Air Force does not have definitive loudness studies for the F-35. How can we be assured that noise levels will not adversely affect these schools and the residential areas around them? How accurate is the Air Force's Environmental Impact Statement? The World Health Organization states that noise levels above 50 decibels can cause health and mental problems. In looking the Air Force's map of the area which would be deemed incompatible for residential use, one easily sees that all the aforementioned schools and their adjacent residential areas would most likely be affected by noise levels above 50 decibels.

In addition to our schools and residences, our city parks and sports complexes will be adversely affected. The Simplot Sports Complex, where hundreds of residents go to play sports or cheer on their children, lies directly in the >65dB DNL area, as do Owyhee Park, Shoshone Park, Cypress Park and Lowder Park. Boise State's football stadium and several city parks including Julia Davis, Ann Morrison, Kathryn Albertson, Ivywild, Manitou, Williams, Baggley, and Phillipi are not far outside the boundary either. Many of Boise's residents picnic, play sports and take their children to play at these parks. For those of us living near these parks, our quality of life would be negatively impacted by the Air Force's proposal. We already hear the large jets that occasionally take off and land at the airport.

The Air Force's EIS states that "proposed CO emission under scenario B3 would exceed the conformity de minimus threshold of 100 tons per year." Air quality is already an issue in the Treasure Valley. Why would we support something that would only increase our air pollution and adversely affect our citizens' health?

We are fortunate to have a wonderful quality of life in Boise. We should not do anything to jeopardize that by increasing our air pollution, diminishing our children's ability to learn, interrupting our sleep, negatively impacting our ability to hear, or eliminating our ability to enjoy our backyards and public open spaces.

Sincerely, Sandy Provant

##### **Corresponds to A1087 BO**

We won't be able to attend the meeting tonight, thanks to the "flu- however, we've reviewed the impact statement, etc., and are not happy about the possibility that these might be stationed at Gowen. My family lives, works, and goes to school on the bench, in the area of the Randolph-Robertson neighborhood, and in looking at the impact maps, I can see that this could be bad for our kids' education, my employer's business, and for our home life, as well. Surely there are less-inhabited areas that this could be done? Aside from the impacts to the human inhabitants of this area, have they looked into the impacts on our birds of prey?

I realize that the city's government is pretty happy with this idea, judging from comments made by the mayor- however, I think that this will affect much more than just the inhabitants of this end of town. As my husband pointed out, this is a valley- sound doesn't always disperse in the predicted way. This could affect quality of life for a lot more of us than those shown on the map. I'm also thinking that this could be very, very bad for a whole range of businesses, too- Boise would not be nearly as desirable as another, quieter location for such things as conventions, national meetings, tourism, etc. This is a

2172 BO

nice place to visit, but I don't think that it will be, if the F-35's are based from here. Bringing them in would not be as good for the local economy as is being implied, not if we're losing businesses due to the noise.

Overall, I and my family are against this.

Is there a way to fill out and submit the comment form online, or do we need to write a direct email to the address on the comment form? Thanks.

Sincerely, Heather and Mark Rodman, and the Rodman family

##### [Corresponds to A1079 BO](#)

I probably won't make either of the public meetings regarding the F-35.

I've lived within one or two miles of Gowan Field for most of the past sixty years. I can't imagine anything louder than the old F-102's. But for my my two cents, none of the airplane noise has ever bothered me.

Now, if you can do something about the loud motorcycles and car stereo's, that'd be something.

Gary

##### [Corresponds to A1086 BO](#)

As a commercial pilot and a retired Navy Chief Hospital Corpsman I have both lived on, and flown from, many military bases with fighter aircraft. Boise is not the place for a training squadron of aircraft with the noise levels F35A's produce. There are many reasons for not basing them here, but one that stands out is the disruption of teaching in affected elementary schools during F35A operations. I personally would like to see them based here so I could watch their operations but that shouldn't happen. MHAFB would be a much better choice for Idaho to consider.

Later.....



Mike Lenaghan

##### [Corresponds to A1089 BO](#)

Don't want the noise!!! Repeat several thousand times.  
Sally Sherman

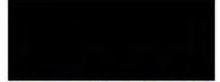
##### [Corresponds to A1090 BO](#)

The F-35A will destroy any semblance of peace and quiet within my own home, and just the possibility of that kind of idiocy, basing a fighter jet right alongside and over a highly-populated valley, is purely insidious megalomania. I know we need our military, but we are NOT the enemy. Why would they (the Alr Force) seek to deploy such a noise polluter smack dab in the middle of the state's largest city? I have seen the EIS and a line has been drawn that engulfs the subdivision I live in, and within that area it will be designated as "not suitable for residential living." Dear God in Heaven,

2172 BO

overnight, over 10,000 people who live next to and within the airport corridor will lose nearly all property value, will not be able to sell for any profit, and will be forced to either walk away from their homes, or try to endure the deafening roar, INSIDE THEIR HOMES WITH DOORS AND WINDOWS SHUT, of possibly 40 sorties a day being flown! That is total insanity and shows such callous disregard for our citizens that it's hard to believe it is about to be perpetrated upon us. And sadly, this is not conjecture, it may soon be our reality. Sell now, while you can.

Jim Sower



[Click Here to View My Web Site](#)





United States  
Department of  
Agriculture

Forest  
Service

Lincoln National Forest

3463 Las Palomas Rd.  
Alamogordo, NM 88310  
(575) 434-7200

2173 HO

2173 HO

File Code: 1910  
Date: March 15, 2012

HQ AETC/A7CPP  
Attn: David Martin and Kim Fornof  
Air Force Contractor  
266 F Street West  
Building 901  
Randolph AFB, TX 78150-4319

Dear Mr. Martin and Ms. Fornof,

Thank you for providing the USDA Lincoln National Forest (LNF) with a copy of your Draft Environmental Impact Statement (DEIS). The area of interest to the LNF includes the area in and surrounding the Holloman AFB Alternative. In response to the identification of the Noise and Land Use, which states that the F-35A generates an overflight sound exposure level approximately 6 decibels (dB) higher than the F-16C, there is a concern with effects to the Mexican spotted owl (MSO).

The Lincoln National Forest has a specific Project Design Feature (PDF) based on MSO Recovery Plan guidance and numerous Formal Consultations with U.S. Fish and Wildlife Service (USFWS) that calls for no treatments to occur in protected activity centers (PAC) or areas surrounding MSO breeding habitat from March 1<sup>st</sup> until August 31<sup>st</sup> (breeding season). The only exceptions will be if personnel conduct monitoring according to USDA Forest Service Region 3 Formal Monitoring protocols, and determine that reproduction has not occurred for each PAC.

Research by David Delaney in July 1997 studied how helicopter and chainsaw use might affect reproducing MSO on the Sacramento Ranger District. He found a high percentage of flushing (causing the owl to leave the site) by chainsaw use if it was within 100 feet (ft). There was 6% flushing frequency on owls (due to the noise) if it was within 198 feet. He found 0% flushing at distances beyond 341 feet. The flight deck will be a range of 100 ft to 500 ft, with the noise at 300 ft expected to reach 133 dB. A chainsaw at 3 ft is 110 dB, which is well below that of the overflight sound exposure of the predicted F-35A. Therefore the overflight could be reasonably predicted to disturb the MSO during breeding season. USFWS has previously concurred that high decibel sounds are responsible for causing flushing during breeding season, and thus, harassment of the MSO (which constitutes ESA Take).

BI-20

Based on this information, the USFS feels that a "No Effect" determination for the MSO, regarding the potential noise disturbance during breeding season (March 1<sup>st</sup> through August 31<sup>st</sup>) is not in line with previous USFWS concurrence of effects. A "May Affect, Likely to Adversely Affect" determination is a more reasonable determination of effects. However, if no overflights are to occur between March 1-August 31, then a "No Effect" determination is appropriate.

I thank you for the opportunity to review the document and provide comments. Your time and consideration is appreciated. If you have any questions please contact Ron Hannan (575)434-7245, [rhannan@fs.fed.us](mailto:rhannan@fs.fed.us)), Public Service Staff Officer.

Sincerely,

ROBERT G. TRUJILLO  
Forest Supervisor



Caring for the Land and Serving People

Printed on Recycled Paper

**SILVER BELL RANCH**  
**P.O. Box 515**  
**Weed, New Mexico 88354**  
**575-687-3316**

2174 HO

2 Mach 2012

F-35A Training Environmental Impact Statement (EIS)  
 ATTN: Mr. David Martin, AETC NEPA Program Manager  
 HQ AETC/A7CPP  
 266 F Street West, Bldg 901  
 Randolph AFB, TX 78150-4319

Re: Scoping Comments on Proposed Base Expansion

Dear Mr. Martin:

I am writing you concerning the proposed F-35 basing at Holloman AFB. My family homesteaded here in 1899 and the ranch has been operated by family members for the last 110 years. Three years ago we were able to purchase another 280 acre ranch just east of Weed. This has been the fulfillment of a life-time dream for both me and my wife. As you can see our roots go deep here and we plan to stay here permanently.

We have a very real concern about the impact this proposed F-35A placement may have on us directly and would appreciate input from you as you study the impact this will have on locals. Specifically our concerns are:

1. What impact will the proposed expansion have on the aesthetic resources? ] LU-35
2. What will be done to insure my quality of life is not disturbed? ] NO-36
3. What research have you done to show the impact on cattle, horses and other ranch animals? ] BI-22
4. What research have you done to show the impact on wildlife and the natural systems that support them? ] BI-2
5. What specific precautions are being made to prevent damage to us as citizens and our homes and our way of life? ] SA-27
6. Why will flares be used in an area with a history of extreme wildfires and high fire danger? ] DO-64

We feel that we will be directly and adversely affected by this proposal. Our present livelihood is dependent on the cattle we raise and hunting. We have very carefully selected Angus cattle which are rated near the top in the United States for growth, size and meat quality. They come at a very expensive price and tend to be sensitive to outside influences. One cow delivered her calf early simply because we moved her from another site. We have had a calf aborted already this year. It is of utmost importance that these animals be left undisturbed to insure full calf crop and meat production. Will you reimburse us for any loss we sustain due to interruptions from the F35.s? ] BI-5  
] SO-11

2174 HO

I have been very disappointed at your lack of regulation of the F22's which fly over us at the present time. Recently, I was on the phone with an insurance agent when we received the repercussions from an intensified sonic boom. We live in an 86 year old home which rattled and shook until I was sure the windows were broken. I was very frightened. The agent on the line asked if I was all right and what had happened. She had heard the boom over the phone and was concerned for my safety. At the time, my husband was working on our backhoe. My first thoughts were that the backhoe had fallen on him, yet I knew that even that couldn't have caused such an intense boom. I understand that should the F-35's be allowed in this airspace we will become subject to even more frequent intense occurrences. ] NO-12  
] NO-91

At the present time we have several horses which we use on the ranch and for recreation. These are animals which we have raised from colts as green broke. I can't help but wonder what will happen if we or our grandchildren are riding when we experience and intense sonic boom. I have ridden and trained horses for 45 years and I can assure you that even the most placid animal will spook when exposed to an intense noise and ground shaking. This could even be life threatening. How will you repay the loss of life of a grandchild? ] BI-1

I, have a degree in Forestry from Utah State University. I have worked for the Lincoln National Forest as a timber technician and as a fire prevention technician. With my knowledge and background of fire danger, I am amazed that you would even consider flying planes with flares over this area which has such a history of devastating wildfires and loss. Has this proposal been coordinated with the US Forest Service? ] DO-64

John has also worked for the Lincoln National Forest as the helitack foreman. We have both seen firsthand what lack of understanding of this unique fire situation can cause. In 1977, John said as we were landing the helicopter at the Weed Lookout helitack base, a jet flew under below the helicopter. We were at an elevation of less than 500 feet. The jet had to be at an altitude of only 100 to 200 feet. It was terrifying to me and my crew. The helicopter pilot reported the incident but nothing was done. ] GE-13

I am also concerned that the F-35's will be carrying live or dummy ammunition. A few years ago in Monahans, Texas, the headlines of the morning paper told of a bomb dummy which had accidentally been released by a pilot in training from either this base or El Paso. Luckily the dummy did not kill anyone but fell through the roof and floor through the bathroom and three feet deep into the ground ] SA-13  
] SA-4

Mr. Martin, we have experienced firsthand the errors and problems that already exist from your training and experimental programs. Please do not make this situation worse. Please consider the issues we have presented. We would appreciate an answer to the questions we have posed.

Sincerely,  


**Final**  
**June 2012**

2175 HO

Silver Bell Ranch  
John & Sylvia Bell  
615 Hwy 24  
Weed, NM 8835  
575-687-3316

F-35A Training Basing Environmental Impact Statement  
David Martin, AETC NEPA and Kim Fornof  
HQ AETC/A7CPP  
266 F. Street West, Bldg 901  
Randolph AFB, Tx 78150-4139

Re: F35 Training over the Sacramento Mountains

Dear Sir and Madam,

As I am writing you this morning at 10:30 am on Monday March 5, 2012, I just got sonic boomed two times in less than a 2 minute period. Two of our grandchildren (ages 2 and 4) are staying here at our Weed Ranch this week. I understand that Germany did a study about aircraft noise several years ago and found they were causing hearing damage to their children. About that time the German Air Force moved many of their flight operations to Holloman Air Force Base. Why are we allowing anyone to place our children and our health at risk?

What studies have you done about hearing damage and other problems caused by the F-35A and any other aircraft with which you are booming us? We are tired of "Shock and Awe" being practiced over our homes and cattle. What impact are you having on our hearing and health? What are the effects on our cattle? Every time sonic boom occur especially the focused sonic booms (Shock and Awe) it rattles our nerves causing increased stress for us, our pets & livestock, and even our game animals. Your environmental impact study cannot be properly completed until studies are done to understand what impact your F-35A aircraft flights will potentially have to the people and animals exposed to it. Please suspend all testing over populated areas until these studies have been completed.

Please stop allowing any aircraft to fly over my homes and ranches. My Weed home address is listed above and my daughter lives in our Pinon Ranch home at 535 Stevens Draw Road near Pinon, NM. I have about 75 cows plus bulls and horses. I purchased 50 registered Angus cows last year which were all pregnancy tested before I bought them. They are calving at this time but I found one cow that has aborted. I strongly suspect it may have been due to undue stress caused by excessive aircraft noise. Enclosed with this letter you will find a bill for the unborn calf at the estimated weight and value that I expect it would have brought me this fall. After my cows get through calving I will know how many more cow have aborted and I plan to send you a bill for any aborted calves unless I can determine that they aborted for other reasons.

2175 HO

Please remember all of my registered cows were pregnant when they arrived on my ranch. These cows had been bred (artificially inseminated) to some of the best Angus bulls in the world and the ranch where I bought them sells semen all over the world. Their price will be much higher than common commercial calves! In addition I also preg tested all of my commercial cows too. I will carefully evaluate why any of them don't have calves.

Please go practice your Shock and Awe training over unpopulated areas such as the White Sands or McGregor Missile Ranges. The citizens of the Sacramento Mountains and our cattle and game don't need any more stress caused by your fly overs.

We are still enduring a severe drought and we absolutely can't afford any potential fires caused by your flares or a downed aircraft. A few miles from our ranch a fire started yesterday. I hope you weren't dropping flares yesterday??? I am sure the cause will be investigated. We also don't need your chaff polluting our air or land so please alter your flight routes away from the Sacramento Mountains.

I request that you carefully reevaluate where you base and fly your aircraft. Please review my letter and the letters sent to you by our neighbors such as Walt Coffinan, Ellen Kazor, Tom Smith, John Conner, and Tom Ward, the President of our community association. I encourage you to come back to Weed to report the results of your studies, the final EIS results, and your decision about where you plan to fly the F-35A and any other aircraft based at Holloman using our airspace.

Please make sure that you include my letter and the letters of our neighbors in your EIS statement and address our concerns. Wow, I don't know what is going on the morning but while I have been writing this letter we have now experienced Shock and Awe seven times this morning between 10:30 am and 12:20pm. I am seeing jet trails in the sky and hearing their jet engine noise as they fly away. Please address this ASAP. This is not fun. My wife had a migraine headache and is in bed trying to recover. The constant booms are not helping. My blood pressure is up and my stress level went up with every boom. Where should I send our doctor bills? I can assure it is having an adverse effect on our health and welfare.

Sincerely,  
  
John Bell

Cc: Senator Jeff Bingaman, Senator Tom Udall, Congressman Steve Pierce,

2176 TU

**From:** Thomas G. Bever [tgb@readsmart.com]  
**Sent:** Monday, March 12, 2012 8:05 PM  
**To:** AETC/A7P Workflow  
**Subject:** Comment on Draft EIS for F35 basing

Dear Mr. Martin,

This is to express my objections to the current EIS for F35 basing. It is inadequate in many ways, with respect to important impacts and issues basing the F35 in Tucson would have. I address only those relating to noise, and cognition, on which I have some professional expertise.

1. The method of assessing noise levels of the F35 are presented in a confusing manner at best, especially in light of subsequent "corrections" in a later errata sheet.

a) The bases for claiming a particular noise level in relation to the F-16 are not explained. Yet a range of actual tests (e.g., Lockheed) and computer models in prior EIS evaluations (e.g., for Eglin and Nellis AF bases), the average difference in loudness is at least 10 decibels above the louder F-16, at various power levels. Furthermore, currently in Tucson only about 20% F-16 sorties are with the louder version, so the average increase in noise will be more than stated. NO-92

b) The method to estimate the loudness would not be accepted either by Osha nor by NIOSH. Both organisations set standards for accumulated exposure to noise, not a 24 hour average. The F-35 will create ear damage through accumulated noise in an 8 hour period, according to either organisation, for a substantial number of citizens. Put differently, if NIOSH standards used for military operations were applied, only a few sorties per day would be allowed, at most. NO-93

c) The EIS notes that the 65db average contour will increase by a certain number of "acres". In fact, it will increase the size of the contour five fold, up to almost five square miles around the airport. This will mean that many households closer than the 65 db contour will become legally uninhabitable: the majority of these are in low income and minority households, raising issues of minority discrimination - again not adequately addressed in the EIS. NO-1  
SO-1/LU-6  
EJ-4

So, there are two noise issues. First, the EIS is completely inadequate with respect to assessing noise. Second, even the scant information that the EIS does present, shows that the F35 would have a disastrous impact on thousands of citizens. NO-4  
NO-11

2. The impact of the aircraft noise on cognition, learning and health is not addressed adequately, if at all, in the EIS. Yet, a 2011 World Health Organisation Study presents massive numbers of scholarly research articles on the impact of airport noise on blood pressure and learning ability: this includes careful studies of before-and-after impact of an airport similarly distant from neighbours as would be the case for large areas here in Tucson. This document is not obscure, and it is a major failing of the EIS to ignore it. The WHO report addresses the economic impact of the health and cognitive effects of local airports, which the current EIS also ignores. EJ-2  
SO-40

Sincerely,

Thomas Bever, PhD.  
 Regents Professor, Linguistics, Neuroscience, Psychology University of Arizona,

**United States Air Force**  
**Scoping Meeting Comment Form**  
**F-35A Training**  
**Environmental Impact Statement**



2177 BO

Please record your comments on this form to let the U.S. Air Force know what environmental factors you want considered in the development of the F-35A Training Environmental Impact Statement (EIS). You may submit your comments by:

- 1) Depositing this form at the Comment Table before you leave tonight.
- 2) Mailing this form to:  
 Mr. David Martin  
 HQ AETC/A7CPP  
 266 F Street West, Bldg 901  
 Randolph AFB, TX 78150-4319  
 FAX: (210) 652-4266

**All comments must be postmarked or received no later than April 5, 2010, to be considered in the Draft EIS.**

Public comments are requested pursuant to the National Environmental Policy Act (NEPA), 42 USC 4321, et seq. All written comments received during the comment period will be considered during Draft EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Draft EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Draft EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

**Name:** Russell, Vicki, Amelia, and Sarah Baer \_\_\_\_\_

**Organization/Affiliation:** Sunrise Rim Neighborhood Assn. \_\_\_\_\_

**Address:**\* 2224 Sunrise Rim Rd \_\_\_\_\_

**City, State, Zip Code:** Boise, Id. 83705 \_\_\_\_\_

**Comments:** We wish to add our family to the opposition of the F-35 Training Facility in Boise, Idaho. The negative impact on property values, health, and area schools is too great a price. Our family has lived in the same house for 24 years. We respect and enjoy the services of the airport, but not to the extent of the health and life style costs outlined. \_\_\_\_\_

GE-4  
 SO-1  
 NO-6  
 EJ-2  
 NO-36

\*Provide your mailing address to receive future notices about the Air Forces F-35A Training EIS.

### I Oppose Bringing the F-35 to Tucson

2178 TU

GE-4

Printed Name	Signature	Street Address	Zip Code	E-mail
Andrew Jones	<i>Andrew Jones</i>	[REDACTED]	[REDACTED]	[REDACTED]
JUDY ROMAN	<i>Judy Roman</i>	[REDACTED]	[REDACTED]	[REDACTED]
Michael Stammes	<i>Michael Stammes</i>	[REDACTED]	[REDACTED]	[REDACTED]
Valerie D. Cornelius	<i>Valerie D. Cornelius</i>	[REDACTED]	[REDACTED]	[REDACTED]
Arthur Naiman	<i>Arthur Naiman</i>	[REDACTED]	[REDACTED]	[REDACTED]
Lynda Gordon	<i>Lynda Gordon</i>	[REDACTED]	[REDACTED]	[REDACTED]
Rachel Wint	<i>Rachel Wint</i>	[REDACTED]	[REDACTED]	[REDACTED]
Carol Richards	<i>Carol Richards</i>	[REDACTED]	[REDACTED]	[REDACTED]
James Richards	<i>James Richards</i>	[REDACTED]	[REDACTED]	[REDACTED]
Tanya M. Robinson	<i>Tanya M. Robinson</i>	[REDACTED]	[REDACTED]	[REDACTED]
Lena Rothman	<i>Lena Rothman</i>	[REDACTED]	[REDACTED]	[REDACTED]

### I Oppose Bringing the F-35 to Tucson

2178 TU

GE-4

Printed Name	Signature	Street Address	Zip Code	E-mail
Sally Ed Hunter	<i>Sally Ed Hunter</i>	[REDACTED]	[REDACTED]	[REDACTED]
Nancy Murphy	<i>Nancy Murphy</i>	[REDACTED]	[REDACTED]	[REDACTED]
Anne Beemer	<i>Anne Beemer</i>	[REDACTED]	[REDACTED]	[REDACTED]
Brue Plenk	<i>Brue Plenk</i>	[REDACTED]	[REDACTED]	[REDACTED]
Rita Loman	<i>Rita Loman</i>	[REDACTED]	[REDACTED]	[REDACTED]
Wendell Long	<i>Wendell Long</i>	[REDACTED]	[REDACTED]	[REDACTED]
FRANK RUPP	<i>Frank Rupp</i>	[REDACTED]	[REDACTED]	[REDACTED]
Russell Loew	<i>Russell Loew</i>	[REDACTED]	[REDACTED]	[REDACTED]
Kelvin Corales	<i>Kelvin Corales</i>	[REDACTED]	[REDACTED]	[REDACTED]
Sharon Steele	<i>Sharon Steele</i>	[REDACTED]	[REDACTED]	[REDACTED]
Raf Seckman	<i>Raf Seckman</i>	[REDACTED]	[REDACTED]	[REDACTED]
Barbara Pabstschmid	<i>Barbara Pabstschmid</i>	[REDACTED]	[REDACTED]	[REDACTED]
Michael Ames	<i>Michael Ames</i>	[REDACTED]	[REDACTED]	[REDACTED]

**I Oppose Bringing the F-35 to Tucson**

2178 TU  
GE-4

Printed Name	Signature	Street Address	Zip Code	E-mail
Mary Myers	<i>Mary Myers</i>	[REDACTED]	[REDACTED]	[REDACTED]
Wary Aryston	<i>Wary Aryston</i>	[REDACTED]	[REDACTED]	[REDACTED]
B.H. SENSEN	<i>B.H. SENSEN</i>	[REDACTED]	[REDACTED]	[REDACTED]
Catherine Martin	<i>Catherine Martin</i>	[REDACTED]	[REDACTED]	[REDACTED]
Wilma Fogleman	<i>Wilma Fogleman</i>	[REDACTED]	[REDACTED]	[REDACTED]
Dina Afari	<i>Dina Afari</i>	[REDACTED]	[REDACTED]	[REDACTED]
Kathleen Lavoie	<i>Kathleen Lavoie</i>	[REDACTED]	[REDACTED]	[REDACTED]
Mark R. Hipping	<i>Mark R. Hipping</i>	[REDACTED]	[REDACTED]	[REDACTED]
PAM BURRIS	<i>Pam Burris</i>	[REDACTED]	[REDACTED]	[REDACTED]
Ya-Ching Lin	<i>Ya-Ching Lin</i>	[REDACTED]	[REDACTED]	[REDACTED]
Deb Collingswood	<i>Deb Collingswood</i>	[REDACTED]	[REDACTED]	[REDACTED]
Mark M. Mahan	<i>Mark M. Mahan</i>	[REDACTED]	[REDACTED]	[REDACTED]
Bob McNeil	<i>Bob McNeil</i>	[REDACTED]	[REDACTED]	[REDACTED]
Daniel W. Gallahue	<i>Daniel W. Gallahue</i>	[REDACTED]	[REDACTED]	[REDACTED]
SUSAN THORPE	<i>Susan Thorpe</i>	[REDACTED]	[REDACTED]	[REDACTED]

**I Oppose Bringing the F-35 to Tucson**

2178 TU  
GE-4

Printed Name	Signature	Street Address	Zip Code	E-mail
clay culpepper	<i>Clay Culpepper</i>	[REDACTED]	[REDACTED]	[REDACTED]
Megan Wagner	<i>Megan Wagner</i>	[REDACTED]	[REDACTED]	[REDACTED]
William Callinan	<i>William Callinan</i>	[REDACTED]	[REDACTED]	[REDACTED]
Francesca Pades	<i>Francesca Pades</i>	[REDACTED]	[REDACTED]	[REDACTED]
ALISON WOOD	<i>Alison Wood</i>	[REDACTED]	[REDACTED]	[REDACTED]
Jennie Mullins	<i>Jennie Mullins</i>	[REDACTED]	[REDACTED]	[REDACTED]
Rudie A. van der Zee	<i>Rudie A. van der Zee</i>	[REDACTED]	[REDACTED]	[REDACTED]
Donna van der Zee	<i>Donna van der Zee</i>	[REDACTED]	[REDACTED]	[REDACTED]
M Gray	<i>M Gray</i>	[REDACTED]	[REDACTED]	[REDACTED]
R. Dickson	<i>R. Dickson</i>	[REDACTED]	[REDACTED]	[REDACTED]
G. Carter	<i>G. Carter</i>	[REDACTED]	[REDACTED]	[REDACTED]
Erika Kreider	<i>Erika Kreider</i>	[REDACTED]	[REDACTED]	[REDACTED]
Sue Sanders	<i>Sue Sanders</i>	[REDACTED]	[REDACTED]	[REDACTED]
Doreen Fish	<i>Doreen Fish</i>	[REDACTED]	[REDACTED]	[REDACTED]
Amdia Jones	<i>Amdia Jones</i>	[REDACTED]	[REDACTED]	[REDACTED]



**United States Air Force**  
**Public Hearing Comment Form**  
**F-35A Training Basing**  
**Environmental Impact Statement (EIS)**



2179 TU

2179 TU

Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways:

- 1) Turn in this form at the comment table before you leave tonight.
- 2) Provide oral comments to the court reporter during the open house session or public hearing.
- 2) Mail, fax or email comments to:  
 David Martin, Air Force Contractor, and Kim Fornof  
 HQ AETC/A7CPP  
 266 F Street West, Bldg. 901  
 Randolph AFB, TX 78150-4319  
 Fax: 210-652-5649  
 Email: aetc.a7cp.inbox@us.af.mil

All comments on the Draft EIS must be postmarked or received by March 14, 2012, to ensure they become part of the official record. All comments will be addressed in the Final EIS.

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name: Susan Silverman  
 Organization/Affiliation: Executive Dir., G.A.P. D.E.N. Inc.  
 Address: 2833 E Arroyo Chico  
 City, State, Zip Code: Tucson, AZ 85716

Comments: The Draft EIS did not address many of the issues that NO-36  
are critical to the quality of life in my neighborhood.  
First, I request more time for public comments on the NP-12  
Draft EIS through an extension of at least 45 days  
from 3/14/12. Second, the current noise levels of many of the NO-8  
planes flown over our homes is currently unbearable.  
Any increase in noise levels at all is completely NO-1  
unacceptable. Noise impedes on my ability to conduct SO-18  
business out of my home office, and I know that  
increased noise levels will lower the property values SO-1  
of the homes in our neighborhood even further  
than they already have through the closing of Keen SO-40  
Elementary School and the determination that  
homes in that neighborhood are no longer fit LU-6

\*\*\*Please print - Additional space is provided on the back.\*\*\*

Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.

\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS.

For human habitation. <sup>excessive</sup> Third, plane noise  
 causes a traumatic response to me, to my  
 animals, to my children and to all those  
 who visit me in my home.

NO-6  
EJ-2  
BI-5

I support the economic development  
 that Davis Monthan and the Tucson Airport  
 bring to our community. I also treasure  
 the natural beauty of the Sonoran Desert  
 that surrounds the Tucson area. Loud noise  
 destroys my appreciation of the natural  
 world around me.

NO-18

Please consider flight paths for this project  
 OUTSIDE of inhabited urban areas.

GE-1

For the sake of all the residents and  
 visitors of Tucson, do not fly loud planes  
 over our heads and presume that we  
 will not be negatively impacted by this  
 decision of the Air Force, in the name of  
 the greater good.

GE-4

I do not support the acceptance of  
 this draft EIS and I urge you to  
 reconsider the location of this training  
 program ~~to~~ to another site other  
 than the Tucson area.

GE-4

GE-1

Thank you for your kind  
 consideration.

Sincerely,

P.S. - My comments reflect the opinion of myself and  
 my entire family (Richard, Eva and Kacey Roati).

Final  
 June 2012

2180 TU

From: Pastor Stertzbach [pastor.s@bethelaz.org]  
 Sent: Monday, March 12, 2012 7:45 PM  
 To: AETC/A7P Workflow  
 Subject: F-35 aircraft

David Martin & Kim Fornof,

I wanted to stick my two cents in about the F-35 training being in Tucson. Davis-Monthan has a long history of support for training & is ideal flight conditions for training young pilots. The community is supportive of the base with good housing available & close by. Not only that but the weather is so conducive to having the aircraft there.

GE-3

I am a pastor at Bethel Baptist Church in Tucson. We are great supporters of our men & women at D-M & would love to see this new fighter training here. There are probably a huge number of factors in such a decision, but we welcome this unit & hope to see it integrated into our community.

Dr. David Stertzbach

2181 TU

-----Original Message-----  
 From: Trevor Buhr [mailto:TBuhr@azgfd.gov]  
 Sent: Friday, March 16, 2012 12:17 PM  
 To: AETC/A7P Workflow  
 Cc: Laura Canaca; Bob Posey; Deanna Kephart; Velma Holt-Buhr  
 Subject: F-35A Training Basing Draft Environmental Impact Statement - Attention David F. DeMartino  
 Importance: High

Greetings,

My name is Trevor Buhr. I am the Habitat Program Manager for Region 3 (Kingman) with the Arizona Game and Fish Department (AGFD). Region 3 is essentially located in the Northwest 1/6th of the state, and is comprised primarily of Mohave and Yavapai County.

I have had the opportunity to review the F-35A Training Basing Draft Environmental Impact Statement - and have one primary concern relating to desert bighorn sheep in Region 3.

Given there will be a significant number of low level training flights taking place, with noise levels in some cases exceeding 110 dB, the Department has concerns relating to how this will impact and potentially disrupt desert bighorn sheep rearing behavior during lambing season.

The lambing and important rearing season extends from roughly February 1st through May 15th, and the Department is advocating that low-level training flights with associated noise impacts be avoided in lambing and designated high-quality desert bighorn sheep habitat during this time period each year.

This recommendation is in accordance with guidance for the management of bighorn sheep on public lands that is found on page 84 of the Resource Management Plan (RMP) for the Bureau of Land Management's Kingman Field Office.

Key populations of desert bighorn sheep in Region 3 are located in the Black Mountains to the West of Kingman - and extending North to the Hoover Dam, on Mount Wilson and Fortification Hill South of Lake Mead and East of US 93, the Mohave Mountains East of Lake Havasu City, Hell's Half Acre in the Aquarius Mountains North of the Bagdad Mine, as well as in the Aubrey Peaks and near People's Canyon in the Arrastra Mountains Wilderness Area West of Wikieup and US 93.

Attached for your convenience are shape-files of desert bighorn sheep habitat modeled for Region 3 during the summer of 2011. The key avoidance areas from this data set would include both "Lambing Grounds" and areas designated as "High Quality" desert bighorn sheep habitat - as lambing and rearing would likely be localized in these two key areas.

With coordination between USAF and AGFD biologists, I am confident that we can successfully mitigate impacts to this important, native keystone species in Arizona.

Thank you for your time and consideration in this matter. If you have any questions relating to these comments or the data provided by the Department, please feel free to contact me at your convenience.

Sincerely,

Trevor Buhr

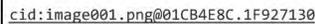
Trevor Buhr

Habitat Program Manager - Region III

Arizona Game and Fish Department

BI-21

2181 TU

5325 N. Stockton Hill Road  
 Kingman, Arizona 86409  
 Off. (928) 692-7700, EXT 2305  
 Fax (928) 692-1523  
[tbuhr@azgfd.gov](mailto:tbuhr@azgfd.gov) <<mailto:tbuhr@azgfd.gov>>  
  
[http://www.azgfd.gov/h\\_f/getoutside.shtml](http://www.azgfd.gov/h_f/getoutside.shtml)  
[http://www.azgfd.gov/h\\_f/getoutside.shtml](http://www.azgfd.gov/h_f/getoutside.shtml)  
 Click here <<https://az.gov/app/huntfish/home.xhtml>> to buy your hunting or fishing license online  
 Click here <<http://www.hunter-ed.com/az/index.htm>> to enroll in the online Introductory Hunter Safety Class  
 Click here <[http://www.boat-ed.com/az/az\\_internet.htm](http://www.boat-ed.com/az/az_internet.htm)> to enroll in the online Boat Arizona, Boater Safety Class  
 Click here <<http://www.azgfd.gov/eservices/subscribe.shtml>> to sign up for FREE Arizona Game and Fish Department e-news subscriptions

3

2182 TU

## United States Air Force

### Public Hearing Comment Form

#### F-35A Training Basing

#### Environmental Impact Statement (EIS)




Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways:

- 1) Turn in this form at the comment table before you leave tonight.
- 2) Provide oral comments to the court reporter during the open house session or public hearing.
- 2) Mail, fax or email comments to:
  - David Martin, Air Force Contractor, and Kim Fornof
  - HQ AETC/A7CPP
  - 266 F Street West, Bldg. 901
  - Randolph AFB, TX 78150-4319
  - Fax: 210-652-5649
  - Email: [aetc.a7cp.inbox@us.af.mil](mailto:aetc.a7cp.inbox@us.af.mil)

**All comments on the Draft EIS must be postmarked or received by March 14, 2012, to ensure they become part of the official record. All comments will be addressed in the Final EIS.**

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Name: MR. DOYLE E. AND MRS. TANYA DILLON

Organization/Affiliation: JULIA KEEN NEIGHBORHOOD ASSOCIATION

Address: 1841 SOUTH CHRYSLER AVENUE

City, State, Zip Code: TUCSON, ARIZONA 85713-2404

Comments: Our neighborhood has been in DAVIS MONTAN'S flight path for more than 50 years. We have seen our schools closed, and our property values plummet, and not because of the poor economy, but because we are in a high risk area. D.M's flight path.

GE-13

Now, because some people of clout and means have decided that they can get another feather in their caps or whatever compensation.....we the people are being put in yet another risky situation, by allowing the F-35A, an experimental aircraft to fly over the city of Tucson and our neighborhoods, and the sound barriers to be broken again.

PN-1

WE SAY NO TO THE F-35A, PLEASE GO ELSEWHERE NOT TUCSON.

SA-12  
SA-1  
NO-1  
GE-1  
GE-4

\*\*\*Please print – Additional space is provided on the back.\*\*\*

Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.

\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS.

**Final**  
**June 2012**

2183 TU

**Grant Road Lumber Co., Inc**

March 2, 2010

David Martin, Air Force Contractor and Kim Fornof  
HQ AETC AETC/A7CPP  
266 F Street West Building #901  
Randolph AFB, TX 78150-4319

Fax 210-652-5649

Re: F-35A Training Basing Tucson, Arizona  
Environmental Impact Statement

Good Afternoon,

Grant Road Lumber Co. completely supports the efforts of various entities such as the 182<sup>nd</sup> Fighter Wing Minuteman Committee and the DMSO, of which I am a member, in their mission of promoting the Tucson International Airport as one of this nation's premier fighter pilot training installations and as a pilot training site for the next generation of U. S. Air Force fighter aircraft, the F-35.

The Arizona Air National Guard has long served this nation as a pilot training center and this community as a powerful economic force. The base's \$280 million positive economic impact on the local community cannot be overstated. The advantages of pilot training in Arizona, its consistent weather, its ranges and its existing military aviation infrastructure, are clear. Equally important is the community support for the continued role of the Guard and its mission. We look forward to the base's future prosperity.

Our contractor yard facility is located near DMAFB on 36<sup>th</sup> Street at the Veteran's Memorial overpass. We regularly observe aircraft from DMAFB and the Arizona Air National Guard on their training flights. It is my hope the F-35 aircraft will be based at TIA and will have a regular presence in the sky over Tucson.

We look forward to another generation of aircraft in Tucson to help preserve our freedom. Thank you for the opportunity to provide input for this very important and effective partnership.

Sincerely,

David Hauert  
Vice-President, General Manager

Mailing Address:  
P.O. Box 42227, Tucson, AZ 85733

Locations:  
Main Yard – 2543 E. Grant Rd. Phone: 520-795-4160; Fax: 520-795-1660  
Contractor Yard – 3361 E. 36<sup>th</sup> Street. Phone: 520-622-6100; Fax 520-622-3178

GE-3

2184 TU

**United States Air Force  
Scoping Meeting Comment Form  
F-35A Training  
Environmental Impact Statement**



Please record your comments on this form to let the U.S. Air Force know what environmental factors you want considered in the development of the F-35A Training Environmental Impact Statement (EIS). You may submit your comments by:

- 1) Depositing this form at the Comment Table before you leave tonight.
- 2) Mailing this form to:

Mr. David Martin  
HQ AETC/A7CPP  
266 F Street West, Bldg 901  
Randolph AFB, TX 78150-4319  
FAX: (210) 652-4266

Public comments are requested pursuant to the National Environmental Policy Act (NEPA), 42 USC 4321, et seq. All written comments received during the comment period will be considered during Draft EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Draft EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Draft EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name: **Dr. Irv Schwartz, President**

Organization/Affiliation: **Tucson Mountains Association**

*Irv Schwartz, M.D., MPH*  
Address: **P.O. Box 86117**

City, State, Zip Code: **Tucson, AZ 85754-6117**

Comments:

Environmental analysis completed to date indicates the F-35 bed down will not adversely affect current airspace and aircraft operations, safety, recreation, socioeconomic, soils, water, biological resources nor cultural resources. Clearly this analysis is inaccurate and misguided.

NP-13

The Tucson Mountains Association (TMA) is the neighborhood association of record for a large area spanning portions of the City of Tucson, unincorporated Pima County, and Marana. It includes the area bounded on the north by Twin Peaks Road, on the east by Silverbell Road, on the south by the 22<sup>nd</sup> Street Alignment/Starr Pass Boulevard, and on the west by Saguardo National Park and Tucson Mountain Park. TMA understands the economic importance of aircraft training by the National Guard at Tucson International Airport. Our mission is:

- ❖ To protect the natural habitat to preserve the biological diversity of the area, and
- ❖ Do all things necessary and desirable to protect the health and well-being of our members and the native flora and fauna

We have significant concerns about the F-35 and the impact on residents. To date, we have been unable to obtain information to address these concerns. Therefore, we are **opposed** to locating the aircraft at Tucson International Airport. We are concerned about:

GE-4

Final  
June 2012

	2184 TU
<ul style="list-style-type: none"> <li>-Reduction of noise levels and mitigation of related impacts</li> <li>-Testing of the aircraft in the Tucson area</li> <li>-Long-term responsiveness by the Air Force to any aircraft operational agreements that are reached prior to the stationing of the F-35 at TIA</li> <li>-The safety of flights over the Tucson metropolitan area</li> </ul>	<ul style="list-style-type: none"> <li>NO-20</li> <li>GE-2/NO-7</li> <li>AM-3</li> <li>SA-2</li> </ul>
<u>Noise Issues</u>	
❖ <b>Recreation, Biological Resources, and Cultural Impacts</b>	
<ul style="list-style-type: none"> <li>-Similar to the Grand Canyon, the Tucson Mountains offer diverse recreational opportunities on hiking trails.</li> <li>-We have a strong tourism industry that attracts people to Saguaro National Park, Tucson Mountain Park, the Desert Museum, Gates Pass, and numerous open space areas based on the Sonoran Desert Conservation Plan, which was adopted by Pima County. For example, wildlife watchers spent \$173 M in Pima County in 2001.</li> <li>-F-35 noise levels are three times the level of the F-16 aircraft. Flying sorties will make this noise level even worse. If the noise level detracts from this experience, how can an EIS state there are no impacts, since economic factors link into the use of recreational and cultural resources?</li> <li>-The U.S. Fish and Wildlife Service has documented through its National Fishing and Hunting Surveys the extensive economic impact of recreational participation by the American public.                             <ul style="list-style-type: none"> <li>&gt;If there are distractions and disturbances such as significant noise levels, participation can decline and the recreational benefits will not be realized.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>SO-7</li> <li>NO-18</li> <li>NO-1</li> <li>SO-13</li> <li>SO-7</li> </ul>
❖ <b>Flight Pattern(s)</b>	
<ul style="list-style-type: none"> <li>-Will more than one flight pattern be established? There is no acknowledgement that there is a noise flare when the aircraft cross the Tucson Mountains.</li> <li>-Will a flight pattern be across the top of Tucson Mountains similar to the F-16? Noise modeling was only done at the immediate area of the airfield and at the bombing ranges.</li> <li>- There is no available information about the approach zone. No changes are planned to the takeoff and landing patterns, nor are there changes in the procedures for takeoff and landing.</li> </ul>	<ul style="list-style-type: none"> <li>DO-23</li> <li>NO-38</li> <li>NO-69</li> <li>DO-23</li> </ul>
❖ <b>Flight Levels During Takeoff and Landing</b>	
<ul style="list-style-type: none"> <li>-Are flight levels being considered to avoid noise during takeoffs and landings?</li> <li>-Does the aircraft have capability to descend rapidly toward the end of the approach landing?                             <ul style="list-style-type: none"> <li>&gt;Can the F-35 stay higher across the Tucson Mountains to avoid noise patterns for recreational, cultural, and residential areas?</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>NO-20</li> <li>NO-20</li> </ul>
❖ <b>Use of After Burners Below a Certain Elevation</b>	

	2184 TU
<ul style="list-style-type: none"> <li>-Are there any known requirements that make the use of after burners necessary below 4,000 to 5,000 feet? If so, can guidelines be put in place to minimize how frequently the after burners are utilized?</li> </ul>	<ul style="list-style-type: none"> <li>DO-33</li> </ul>
❖ <b>Timing of Flights</b>	
<ul style="list-style-type: none"> <li>-Can training flights be limited on days of inclement weather (such as thunderstorms and wind storms)?</li> <li>-Can flights be during the days and not at nights?</li> <li>-Can flights have a designated cut off timing during evening hours?</li> </ul>	<ul style="list-style-type: none"> <li>NO-20</li> </ul>
<u>Test of Aircraft in Tucson Area</u>	
<p>It is very important for the residents to have tests of the aircraft in the Tucson area. Senator McCain has stated that aircraft tests will be conducted in both locations. Tucson residents cannot complete an assessment of the aircraft unless a test is conducted in our geographic area. The test needs to take into account the mountains and surrounding foothills.</p>	<ul style="list-style-type: none"> <li>NO-7</li> <li>NO-38</li> </ul>
<p>Indicating there is a shortage of aircraft for this purpose is not appropriate or reasonable (comment made by lead Air Force officer at March 1, 2011 meeting at Sunnyside High School in Tucson). Test information would ensure a more comprehensive and accurate EIS.</p>	<ul style="list-style-type: none"> <li>GE-2</li> <li>NO-7</li> </ul>
<u>Public Safety Issues</u>	
<p>We are very concerned about the safety of flying aircraft over the Tucson metropolitan area. Not so many years ago an aircraft crashed into a school in downtown Tucson. We believe that flight plans must be designed to avoid a repeat of this tragic occurrence.</p>	<ul style="list-style-type: none"> <li>SA-2</li> </ul>

2185 TU



Faxed 10:15 AM MST  
3/13/12

March 12, 2012

Via Fax: 210-652-5649

David Martin, Air Force Contractor and Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX 78150-4319

Re: Proposed Pilot Training Center and Basing of F-35A Training Aircraft EIS

Dear Mr. Martin and Ms. Fornof:

The analysis of the noise impact for the TIA ANG alternative is incomplete and needs to be updated. The EIS states (Chapter 4, page TU-16) that the TIA based F-35s will have to be armed at DMAFB, involving flying in and out of DMAFB; but no analysis of the environmental impact of these flights is presented. A different part of the city will be affected by these sorties, and an analysis needs to be done.

NO-59

Sincerely yours,

Alice Roe, Chair  
Military Community Relations Committee  
2318 E. Elm St.  
Tucson AZ 85719

The Military Community Relations Committee in Tucson has the following member organizations:

- |   |   |
|---|---|
| Air Force Association                               | Language Technologies, Ind.             |
| Arroyo Chico Neighborhood Association               | Law Office of Williamson & Young, PC    |
| Association Managers, Inc.                          | Manning House                           |
| Blenman Elm Neighborhood Association                | Rita Ranch Neighborhood Association     |
| Broadmoor/Broadway Village Neighborhood Association | Sam Hughes Neighborhood Association     |
| Colonia Solana Homeowners Association               | Tucson Metropolitan Chamber of Commerce |
| Diamond Ventures Inc.                               |   |
| DM-50   |   |
| El Encanto Homeowners Association                   |   |
| Julia Keen Neighborhood Association                 |   |

2186 TU

**LEE & TRAVERS P.L.C.**  
Attorneys at Law  
2421 East 6<sup>th</sup> Street Suite 1  
Tucson, Arizona 85719  
E-mail: [blee@leeandtravers.com](mailto:blee@leeandtravers.com)  
E-mail: [travers@leeandtravers.com](mailto:travers@leeandtravers.com)

Brenda J. Lee  
Craig G. Travers

Telephone: 520-322-5575  
Facsimile: 520-322-5499

March 13, 2012

Attn: David Martin  
Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX 78150-4319

Re: F35 Training in Tucson, Arizona

Dear Sir/Madam,

As you are aware the City of Tucson has a great facility at Tucson International Airport upon which the 162 ANG already operates. Here in Tucson we have excellent access to the Barry Goldwater Range as well as fairly close proximity to the southern California Aerospace Industry. The environmental impacts of any noise would be negligible as Tucson is quite used to extensive military traffic based at Davis Mothan Air Force Base (Actually, the final approach at Davis Mothan Air Force Base involves military flights directly over the University of Arizona campus, the final approach for TIA is over less sparsely populated areas). Winds permitting, the Southeast oriented departure patterns place accelerating aircraft over very sparsely populated areas.

GE-3

In summary, as Tucson already has facilities in place and a population used to extensive military air traffic, the environmental impact of an F35 training base in Tucson would be minimal. Tucson does not have as an extensive pollution problem as the

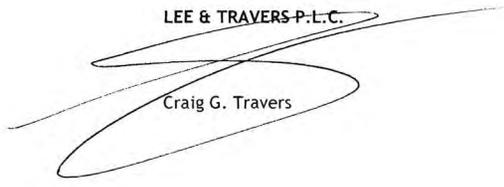
2186 TU

March 13, 2012  
Page 2.

Phoenix area which would seem to favor Tucson over Luke Air Force Base. I appreciate your consideration of my comments. GE-3  
cont'd

Sincerely,

LEE & TRAVERS P.L.C.



Craig G. Travers

CGT/DM

2187 TU

MINNETTE BURGES  
Attorney at Law  
177 N. Church Avenue Suite 808  
Tucson, Arizona 85701

March 13, 2012

SENT BY USPS Regular Mail and EMAIL [aetc.a7cp.inbox@us.af.mil](mailto:aetc.a7cp.inbox@us.af.mil)

David Martin, Air Force Contractor  
Kim Fornof, HQ AETC/A7CPP  
266 F. Street West, Building 901  
Randolph AFB, TX 78150 - 4319

RE: Tucson, Arizona Proposed Pilot Training Center and Basing F-35 Aircraft  
Environmental Impact Statement

Dear Mr. Martin and Ms. Fornof:

By this letter I submit my formal opposition to the following:

- 1. installation of F-35 Aircraft in the Tucson area; and
- 2. training of pilots to fly the F-35 aircraft in skies above the Tucson Area; and
- 3. the inadequacy of the Environmental Impact Statement (EIS) submitted regarding the proposed F-35 installation and pilot training in the Tucson area.

GE-4

First, the Environmental Impact Statement (hereinafter "EIS") submitted in connection with the F-35 installation and pilot training in the Tucson area is critically flawed and has been issued before complete and thorough testing and evaluation has been completed. The document does not serve the purposes for which it is intended as it is not complete and is premature. Statements contained throughout the document are not supported by data, and the document is unreliable. To pursue the installation and pilot training of the F-35 in the Tucson area based on the EIS would be an act of recklessness in failing to demand a comprehensive study complete with fully supporting data and information. A valid and meaningful decision to base the F-35 in Tucson and to train pilots to fly the F-35 over the Tucson area cannot be made based on the flawed and incomplete information presented in the EIS.

NP-13

The F-35 has not yet been safety tested. There is insufficient evidence that training new domestic or foreign pilots over a densely populated metropolitan area such as Tucson, Arizona is safe, and any decision to allow the installation and flight training in Tucson would be recklessly premature.

SA-12

The F-35 has not yet been noise tested in the area. There is insufficient evidence that adding F-35 flights to the already congested airspace over Tucson would be appropriate given the increased noise the cumulative addition of this aircraft's flights would add.

NO-7  
GE-2

Final  
June 2012

2187 TU

Mr. Martin  
Ms. Fornof  
March 13, 2012  
Page Two

Niether the safety concerns nor the noise pollution issue are adequately addressed or raised in the EIS.

Furthermore, I make the additional points in opposition to basing the F-35 and training F-35 pilots in Tucson:

- 1. The “noise contours” that surround the “flight path” in the EIS do not include the actual flight path of the F-35 rendering this information inaccurate at best; ] NO-4
- 2. The EIS states that the F-35 will need to transit to DMAFB to load weapons and depart; the EIS further states that the DMAFB flight line, facilities and airspace will be used for these purposes. This translates to the fact that the flight current DMAFB flight path for departures and arrivals over midtown Tucson of A10, C130 and the other aircraft will be used by the F-35 when needed. ] SA-13  
NO-59
- 3. Both of these situations demonstrate that the F-35 will not fly exclusively along the flight path the Air National Guard (ANG) claims but will be significantly greater and will invade the central city air space and fly over midtown Tucson, the most densely populated area of Tucson area. ] NO-62  
DO-23
- 4. The EIS does not address environmental impacts associated with the actual flight path the F-35 will take over midtown Tucson, and as such, is deficient. A supplemented or revised EIS must fully assess the environmental impact of the F-35 over Tucson. ] DO-23
- 5. The EIS fails to adequately study levels of pollution from flight fumes and fuels, when considered in a cumulative context. ] AQ-14
- 6. The EIS fails to adequately present issues related to noise pollution, and refers to a \$25 million contribution by Pima County to address noise pollution issues, a sum that is not designated and is not authorized for this purpose. ] NO-74
- 7. The EIS is required to conduct an assessment of the entire cumulative impact of the F35. This simply has not been accomplished in any meaningful manner. ] CM-7
- 8. The F-35 will disproportionately expose low income and minority populations to noise in excess of 65dB DNL, a level which both the DOD and FAA have classified as not compatible for residential use. A mitigation plan is not offered and is notably missing from the EIS. ] EJ-4

2187 TU

Mr. Martin  
Ms. Fornof  
March 13, 2012  
Page Three

I am a native of Tucson, Arizona and have witnessed the ever increasing aircraft activity in our skies. Our town currently endures significant harm, risk and pollution as the result of the TIA ANG training programs for F16s and by the DMAFB Operation Snowbird and other flight programs. Classrooms and business activities are often and consistently paused while we wait for military aircraft to pass overhead. Our citizens have witnessed two fatal military crashes in the downtown/central area of the city. The majority of the population of central Tucson are adamantly opposed to any increases in the danger, pollution and noise levels of the F-35. ] EJ-2  
NO-8  
SA-2

I request that the F-35 not be based in Tucson and that F-35 pilot training not take place in the skies over Tucson. To allow this outcome would be irresponsible in these circumstances described above. ] GE-4

Thank you for your consideration for *No F-35s Over Tucson*.

Respectfully,

  
MINNETTE BURGESS ESQ

Final  
June 2012



# Facts and Impacts: The F-35A in Boise

2188 HO

## Have Your Say

The Air Force is seeking your comments before March 14, 2012.

Email: David Martin & Kim Fornof a7cp.inbox@us.af.mil.

Fax: 210-652-5649

### Local Public Hearings

Session: 5-6 p.m.

Presentation/Formal Comment

Session: 6-8 p.m.

Feb. 27, 2012

Capitol City Veterans of Foreign Wars Post 63

8931 W. Arden St.  
Boise, ID 83709

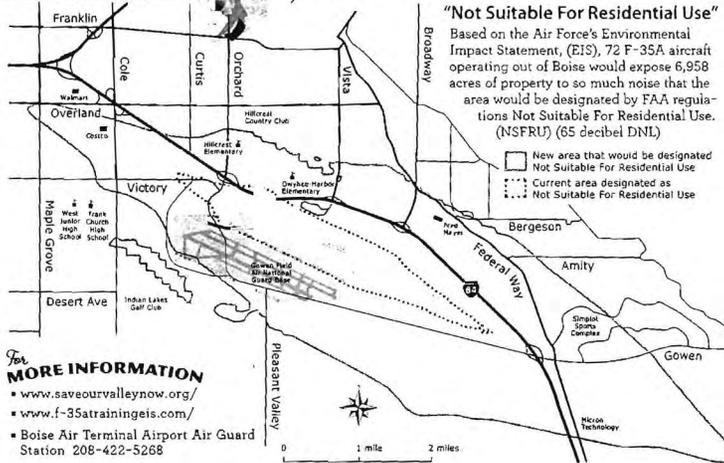
Feb. 28, 2012

Boise Hotel & Conference Center  
Cascade Room  
3300 Vista Ave.  
Boise, ID 83705

Feb. 29, 2012

Marsing American Legion  
Community Hall  
126 N. Old Bruneau  
Highway

- The Air Force wants to base 72 F-35A aircraft at Gowen Field.
- All four locations—Boise, Tucson, Holloman, and Luke, not just one or two—would be scheduled to receive F-35As.
- F-35As are twice as loud as F-15s and F-16s on takeoff and 4 times as loud on landing.
- The 72 F-35As would take off and land 50 times per day for a total of 14,000 times per year.
- The F-35As would use afterburners 1,400 times per year.
- The F-35As would fly at night over 1,400 times per year.
- Stretching from Maple Grove on the west to Columbia Village on the east, the "Not Suitable for Residential Use" (NSFRU) noise footprint would increase from the current 89 acres and 142 residents to 6,958 acres and include 10,119 residents. (See map below)
- 4 schools, 13 day care centers and 2 parks are located in the area that would be designated NSFRU. Major public venues impacted would include Hillcrest Golf Course, Simplot Sports Complex, the Shakespeare Festival complex and Ice World.
- Incidents of speech interference with windows closed would increase 1,100%.
- School classroom impacts and disruption of learning would occur at 4 schools.
  - Sleep interruptions would increase by 33%.
  - 313 residents would experience hearing loss.



### For MORE INFORMATION

- [www.saveourvalleynow.org/](http://www.saveourvalleynow.org/)
- [www.f-35atrainingeis.com/](http://www.f-35atrainingeis.com/)
- Boise Air Terminal Airport Air Guard Station 208-422-5268

March 12, 2012

David Martin, Air Force Contractor, and Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Building 901  
Randolph Air Force Base, TX 78150-4319

RE: Draft EIS on the F-35A

Dear Mr. Martin and Ms. Fornof:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (D-EIS) for the proposed F-35A Pilot Training Center at the Tucson Air Guard Station at TIA in Tucson, Arizona.

We are the Julia Keen Neighborhood Association and the Barrio Centro Association located in mid-town Tucson, Arizona, more specifically, the two neighborhoods closest to Davis-Monthan Air Force Base, where we experience the noise and vibrations and dangers of take-off and landing of various aircraft at very low altitudes. We have a combined residential population of approximately 2100 homes.

We strongly oppose basing this most powerful, loudest, and yet unproven Air Force strike fighter jet at a commercial airport in the middle of a metropolitan area in order to train foreign pilots. As you know, the Tucson Air Guard Station is located at the Tucson International Airport, which in itself will be an additional problem.

On a positive note, please note that we support our Air National Guard and our Air Force friends and neighbors.

The F-35 is extremely noisy. Your D-EIS states that it will be twice as loud as the F-16, and those are computer averaged models, not reality. We have F-16's taking off, landing, and flying over our neighborhoods very fast and at low altitudes, and they are difficult to live with now. We really do not want to have louder planes fly over us. The thunderous roar of noise of the F-16 is too loud already, and we do not want additional planes, especially an unproven F-35 to replace them or even fly over us at all. Since we are at the edge of

- GE-4
- SA-17
- AM-2
- NO-1
- NO-4
- NO-8
- SA-12

Final  
June 2012

2189 TU

DM AFB and we are the first to experience the noise on take-off and landing, we may get noise levels that are way above the twice as loud as an F-16, and we are not even told what that is, it could be four times, ten times. Who really knows?

NO-1

We recently experienced the noise of an F-22 and the noise it created was quite damaging, it literally felt like an ARMY TANK had fallen on the roof. Some residents thought it was a sonic boom. One area resident thought we had had an earthquake. Car alarms were heard all over, people came out of their homes wondering what had happened. You must understand that because we are so close to DM AFB, we hear the noise and feel the vibrations that other areas of the city do not experience. Our area is already, and I cannot emphasize that enough, ALREADY AFFECTED by the current air traffic, we can't even imagine, or we fear that we can imagine the horrific, horrific damage that would await us.

NO-8

NO-1  
NO-12

Since the F-35 is still being tested, there is no historical safety data. It is a brand new electronic aircraft, incorporating all sorts of new technologies. Another thing to keep in mind is that they apparently have problems flying in lightning. We in Tucson are famous for the lightning we experience in the summer monsoon storms, people come from all over to take pictures of the lightning. The D-EIS simply states that history shows that mishap rates of all types will decrease the longer the F-35 is operational as flight crews and maintenance personnel learn more about the aircraft's capabilities and limitations. We would rather wait until there is safety data based on actual flying experience before a decision is made to fly over our populated City neighborhoods. We would not want these planes flying over our City in order to learn of their safety. And safety is one thing, but what can you do about how noisy they are.

SA-12

SA-18

SA-7

SA-1

The D-EIS points out that up to 8,127 new residents living near TIA, who were not previously impacted, will fall under the new 65 dB (DNL) noise contours of the F-35. That area will affect the Sunnyside Unified School District, and may threaten some schools having to be closed, which would really be unforgivable. Closing schools is devastating to a neighborhood, we have already experienced it. The noise impact will also fall disproportionately and adversely on low-income groups and minorities; and as well, it will affect anyone else

LU-6  
EJ-1  
LU-39

EJ-4

2189 TU

who has a business, a church, people that work outdoors, and whatever amount of income they make and whatever background they come from. The D-EIS does not address this issue in the DM AFB area. DOD and FAA guidance note that areas within the 65dB contour are incompatible with residential use. This will damage residents' ability to enjoy the indoor and outdoor environment of their homes. It will lower the property values of their homes, and damage homes more than they have already. It will definitely affect the health of many. You also failed to provide written information in Spanish, as it is well-known that we are a highly Hispanic populated city. We know of many citizens who have written to our Arizona Daily Star Newspaper, and their letters, comments, and issues have been ignored. There has not even been an attempt by the newspaper to do an in-depth investigative article on the neighborhoods closest to both Bases. These issues are simply unfair.

SO-18

LU-6

NO-18

SO-1

NO-12

NO-6

EJ-5

GE-13

The full cumulative effect of F-35 flights over Tucson neighborhoods is not discussed in the D-EIS. This includes (i) The F-35 transit to DM AFB to load live and heavy ordnance not stored at TIA. The F-35 must transit to DM AFB for weapons loading and take-off. Neither the flight paths, nor sorties over Tucson are discussed. (ii) The Air Guard runs the Operation Snowbird Program at DM AFB bringing in A-10's, F-16's, F-18's, and Harriers for 2-6 week training sessions. These fly directly over mid-town, and specifically, we fall right in the flight path closest to DM AFB. When will these be replaced by the F-35? (iii) The Air Guard runs a special Homeland Defense Unit, Operation Noble Eagle, of four F-16's on permanent alert at DM AFB. They take off on some 18 alerts or drills per month at full-after burner and fully armed directly over the City. When will these be replaced by the F-35? It is truly inconceivable to imagine the horrific impact to our area of the City.

CM-16

DO-23

CM-3

The full extent of all F-35 flights over Tucson and their impact needs to be discussed. Our neighborhoods are under the direct flight paths leading to DM AFB, and the noise impact, particularly from the expanded Snowbird Program (F-16's, F-18's, Harriers, Tornados, etc.) are already difficult to live with and are affecting our property values, our homes, our health, and our quality of life.

NO-8

2189 TU

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LU-8

We do not believe that it is wise to base F-35's at TIA, a commercial airport, where the Air Guard Station operates in such an urban area. This is totally unwise, it is totally intrusive. Basic and true factual information of the analysis of noise and safety is not available. The Executive Summary on page 69 states, "Because the F-35A is a new aircraft that is under development, some data normally used to predict noise, air quality, and safety conditions cannot be obtained at this time." We citizens cannot comment meaningfully, nor can our public officials judge a proposal, when critical information is not available or are matters of speculation.

AM-2

NP-13

For these reasons, we strongly oppose basing any F-35's in Tucson, Arizona, at the TIA Air Guard Station, and strongly oppose them going over to the Davis-Monthan Air Force Base as well.

GE-4

We request that you mail us a copy of the Final EIS and any future information you have for the public. Thank you.

NP-7

Sincerely,

*Rita Ornelas*

Rita Ornelas, Co-Chair  
Julia Keen Neighborhood Association  
3679 E. 33<sup>rd</sup> St.  
Tucson, AZ 85713

Ivo Ortiz, President  
Barrio Center Assoc.  
2644 E. Warwick Vista  
Tucson, AZ 85713

cc: Secretary of the Air Force  
Congressman Raul Grijalva  
Tucson Mayor and Council  
Pima County Board of Supervisors  
Sunnyside Unified School District Governing Board  
Arizona Daily Star Newspaper

2190 TU

March 12, 2012

David Martin, Air Force Contractor, and Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Building 901  
Randolph Air Force Base, TX 78150-4319

RE: Draft EIS on the F-35A

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We are the Julia Keen Neighborhood Association and the Barrio Centro Association located in mid-town Tucson, Arizona, more specifically, the two neighborhoods closest to Davis-Monthan Air Force Base, where we experience the noise and vibrations and dangers of take-off and landing of various aircraft at very low altitudes. We have a combined residential population of approximately 2100 homes.

We strongly oppose basing this most powerful, loudest, and yet unproven Air Force strike fighter jet at a commercial airport in the middle of a metropolitan area in order to train foreign pilots. As you know, the Tucson Air Guard Station is located at the Tucson International Airport, which in itself will be an additional problem.

GE-4  
 SA-17  
 AM-2

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NO-1  
 NO-4  
 NO-8  
 SA-12

2190 TU

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LU-39

EJ-4

2190 TU

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LU-6

NO-18

SO-1

NO-12

NO-6

EJ-5

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CM-16

DO-23

CM-3

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NO-8

2190 TU

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AM-2

NP-13

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GE-4

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NP-7

Sincerely,

*Rita Ornelas*

Rita Ornelas, Co-Chair  
Julia Keen Neighborhood Association  
3679 E. 33<sup>rd</sup> St.  
Tucson, AZ 85713

Ivo Ortiz, President  
Barrio Center Assoc.  
2644 E. Warwick Vista  
Tucson, AZ 85713

cc: Secretary of the Air Force  
Congressman Raul Grijalva  
Tucson Mayor and Council  
Pima County Board of Supervisors  
Sunnyside Unified School District Governing Board  
Arizona Daily Star Newspaper

2191 HO

1

March 5, 2012

ATTN: MR David Martin, Air Force Contractor and Kim Fornof  
HQ AETC/A&CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX 78150-4319

RE: Comments on the F-35A Draft EIS

Mr Martin,

Enclosed is a bound copy of many of the letters that were collected regrading the Draft F-35A EIS.

These letters contain questions and concerns of the Weed, Mayhill, Sacramento, and Pinon NM and surrounding communities regarding the Draft EIS.

This bound copy is sent to you as proof that your office received our letters.

Given that answers to our specific questions presented in writing and orally during the scoping period were not addressed in the Draft EIS, we want to guarantee that these questions and concerns will be formally addressed in the Final EIS.

NP-3

NP-8

Since the communities of Weed, Mayhill, Sacramento and Pinon NM will be negatively impacted by the overflights of the F-35A and as tax paying citizens, we expect all of our questions will taken seriously. Please do not respond to these questions in a perfunctory or cursory manner.

NP-8

Omissions generalizations, averages and outdated studies that do not relate to the true environmental impacts of the F-35A are not acceptable.

NP-13

We expect to see applicable data, transparency, and honesty in the Final EIS. The law requires it. Our citizens, our county, and our communities deserve it.

NP-35

Sincerely,

*Tom Ward*

Tom Ward, President  
Weed Community Association

Final  
June 2012









2191 HO

Petition Against F35-A Training  
 Sacramento Mountains, New Mexico

We the undersigned formally submit this petition in objection to the proposed Environmental Impact Statement (EIS) and it alternatives for any and all aerial training activity over the Sacramento Mountains of south central New Mexico. We further declare that the Sacramento Mountain range and non military adjoining lands are not suitable for any military activity due to numerous environmental factors and public safety concerns:

Name	Address	Phone No.	Email
<i>Gary Sanford</i>	[REDACTED]	[REDACTED]	[REDACTED]
<i>Lyden Lewis</i>	[REDACTED]	[REDACTED]	[REDACTED]
<i>Sue Ann McCauley</i>	[REDACTED]	[REDACTED]	[REDACTED]
<i>Wanda Campbell</i>	[REDACTED]	[REDACTED]	[REDACTED]
<i>Jack W. Campbell</i>	[REDACTED]	[REDACTED]	[REDACTED]
<i>Bide Prather</i>	[REDACTED]	[REDACTED]	[REDACTED]
<i>Alarice Stewart</i>	[REDACTED]	[REDACTED]	[REDACTED]

2192 LU



This is not the F-35

**COMMENTING ON THE F-35A**

**HQ AETCA/A/A7CPP**  
**266 F.Street West, Bldg.901**  
**Randolph AFB, TX**  
**78150-4319**

**Ref: Surprise Republic 2/18/2012**

Reading this article, we, the following residents, wish to voice our opinion as to accepting and wanting this great plane of the future, F-35A in 'The Great State of Arizona'.

Supporting the F-35A is our Freedom of choice and all of America if necessity calls. Of course, everyone prays we never will.

But knowing that the 'Flyboys' are here to protect is a good thing.

Please add our numbers to all supporters.

Thank you.

GE-3

Final  
 June 2012



March 12, 2012

2193 LU

Mr. David Martin HQ AETC/A7CPP  
 266 F Street West, Building 901  
 Randolph AFB, TX 78150-4319  
 Aetca7cp.inbox@us.af.mil

Ref: Luke Air Force Base – Environmental Impact Statement (EIS) January 2012

Dear Mr. Martin,

The Palm Valley Phase 5 Homeowners Association (PVP5 HOA) would like to take this opportunity to voice our support for Luke AFB as one the two USAF Bases for the F-35 Joint Strike Fighter (JSF).

GE-3

We have reviewed the F-35A Training Basing Environmental Impact Statement Draft Executive Summary which concludes the Air Force's Preferred Alternative is Luke AFB with 72 F-35A training aircraft, known as Scenario L3. Additionally we have reviewed the two Luke AFB Sections, the Scenario L3 map on page LU-25 and LU-131, and the various Tables including the LU 3.2-3. Noise Levels at Representative Noise-Sensitive Locations, and other materials at the F-35A environmental study web site <http://www.f35atrainingeis.com/EisDocument.html>. We noted from the documentation, our neighborhood borders the 85 dB (black) line from Location 5 to Location 8 (see the attached maps from the Luke Section). This would be from West to East at Sarival Ave to 150<sup>th</sup> Ave and then from South to North along Indian School Rd to just South of Camelback Road. Furthermore, we understand our neighborhood is Residential Area No. 3 (Location No. 5) and we can expect noise levels at 65 dB DNL as the most Western point to 51 dB DNL to the East.

We enjoy a suburban life style and a nice quality of life as does most of Goodyear. We want to ensure our neighborhood is maintained at the noise level we all signed up to live with when we bought our homes in Palm Valley Phase 5. Although the planned noise levels range from 65 dB to 51 dB, we do want to ensure our environment is not impacted with the introduction of the F-35A. If this happens, we cordially request potential noise mitigation with the latest sound mitigation technologies and methodologies, which may include:

NO-17

- Sound Proof Window over a dual pane window
- Home insulation cellulose fiber (walls and attic)
- Vents: Baffle roof, attic and chimney treatment

Finally, as an HOA we are charged with maintaining the expected quality of life in the neighborhood. We consider Luke AFB an important part of our community and wholeheartedly support our United States Air Force and the decision to base the F-35A at Luke AFB. On March 6, 2012, the Board of Directors for Palm Valley Phase 5, representing a community of 1,463 homeowners, voted to submit testimony in support of the preferred alternative for Luke Air Force Base in Scenario L3 and request that noise mitigation methods be considered for the homeowners in the Palm Valley Phase 5 community.

GE-3

Sincerely,



Jody Schmit, President  
 Palm Valley Phase 5 Community Association, Goodyear, AZ 85395

03-14-12 14:34 FROM:LUVR

520-751-0715

1-217 FORM/0001 F-193

**United States Air Force**  
**Public Hearing Comment Form**  
**F-35A Training Basing**  
**Environmental Impact Statement (EIS)**



2194 TU

Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways:

- 1) Turn in this form at the comment table before you leave tonight.
- 2) Provide oral comments to the court reporter during the open house session or public hearing.
- 2) Mail, fax or email comments to:

David Martin, Air Force Contractor, and Kim Fornoff  
 HQ AETC/A7CPP  
 266 F Street West, Bldg. 901  
 Randolph AFB, TX 78150-4319  
 Fax: 210-652-5649  
 Email: [aetca7cp.inbox@us.af.mil](mailto:aetca7cp.inbox@us.af.mil)

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Name: Sheldon H. F. Marks, M.D.

Organization/Affiliation: International Center for Vascular Research

Address: 850 N. Kolb Rd,

City, State, Zip Code: Tucson, AZ 85710

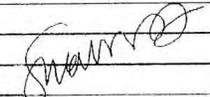
Comments:

Everyone I have talked to is excited & thrilled to be able to provide the community infrastructure to support the F-35 here at Davis-Monthan. Tucson is an Air Force based town, from the beginning it has jets overhead & jet noise is part of who we are. It does not in any way interfere with commerce or our quality of life.

GE-10

GE-3

I encourage you to select Tucson for its great open skies, spectacular weather & high level of community support for F-35 training.



\*\*\*Please print – Additional space is provided on the back.\*\*\*

Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.

\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS

**Final**  
**June 2012**



# COLONIA SOLANA

HOMEOWNERS ASSOCIATION

2195 TU

March 13, 2012

Mr. David Martin, AF Contractor  
And Ms. Kim Fornuf  
HQ AETC/A7PP  
@66 F Street West, Bldg.901  
Randolph AFB, TX 78150-4319

Re: Comments on the F35A Draft EIS and Request for 45 day extension of time for public comment

Dear Mr. Martin and Ms.Fornuf:

Colonia Solana Homeowners Association (CSHA) comprises 123 homes and is considered one of the most unique residential areas in Arizona. Designed in 1928 by landscape architect Stephen Child, who was mentored by famed architect Frederick Law Olmstead, it incorporates natural elements such as Arroyo Chico, which is a lush riparian and desert habitat for birds and wildlife. Child designed the neighborhood with home sites of approximately an acre around five small triangular parks and intersecting curvilinear streets. The neighborhood was predominantly built out during the 1930's and 40's and feature homes designed by a variety of prominent architects in styles ranging from Spanish Colonial Revival to post-war ranch houses.

Colonia Solana is situated in the heart of Tucson. It is home to 87 species of birds, the most found in any neighborhood in the city limits. It is bordered on the north by Broadway Blvd., on the south by Reid Park and the adjacent Reid Park Zoo and Hi Corbett Field, on the west by Country Club and on the east by Randolph Way and the Randolph Golf Course. Hi Corbett Field is the home of the University of Arizona baseball team and has a seating capacity of 10,000. The City of Tucson is in the process of expanding and refurbishing habitats at the zoo and recently spent over \$20 million for a breeding enclosure for elephants.

The CSHA Board of Directors recently met and voted to oppose basing the F35A in Tucson.

GE-4



# COLONIA SOLANA

HOMEOWNERS ASSOCIATION

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### DEIS is premature and the Air Force should withdraw it

We have reviewed the draft Environmental Impact Statement (DEIS) and found it inadequate and troubling. The DEIS is premature, the basic information as to the precise nature and analysis of noise, air pollution and safety of the F35A is either not provided, speculative or unknown and, according to the Air Force, the analysis of aircraft type and number is "not currently ripe for decision making". (DEIS,p.2-7). In the Executive Summary to the F35A Training Basing Environmental Impact Statement, the Air Force admits it is engaging in utter speculation as to the F35A's most basic characteristics of noise, air quality, and safety stating, "[B]ecause the F35A is a new aircraft that is under development, some data normally used to predict noise, air quality and safety conditions cannot be obtained at this time," (Executive Summary to EIS p.@69). Yet, despite the fact that the DEIS is built on speculation and is half baked, it strains credulity and is unfair that the Air Force has forced the public to provide all its comments now before it has fully disclosed all the facts associated with the F35A and the basing alternatives. The Air Force should withdraw the DEIS and reissue it when it has ascertained all the basic characteristics of the F35A, adequately informed the public of them in an open and transparent manner and provided a realistic idea of reasonable alternatives.

NP-13  
NP-35

### F35A noise estimates are not based on reliable, credible and authoritative evidence or actual flight tests but on unreliable "modeling" and the estimates are changing making a flyover an imperative

A reading of the DEIS makes evident that the F35A noise estimates are not based on reliable, credible and authoritative evidence or actual flight tests over areas where they may be based. Furthermore, the Air Force dilutes and minimizes certain of the most damaging F35A noise impacts by estimating noise levels and averaging them on a 24 hour day. The noise estimates, like many of the cumulative impacts of the F35A on our community, are based on unreliable "modeling" or are totally constructed from speculation. Regarding the validity of these estimates, the DEIS concedes: "[I]t should be noted that, although the most accurate and up-to-date data available were used as inputs to noise models and the most current impacts analysis techniques have been employed in calculating noise impacts, all results presented in this DEIS are estimates." (DEIS@p.3-10). In fact, on January 30, 2012 the Air Force admitted that the noise estimates in the DEIS are not even accurate and changed certain of them. Which one of these noise estimates is the most accurate and exactly why, no one really knows. We anticipate the Air force will continue making changes after our right to comment has expired.

NO-4  
NO-57  
NO-13

NO-40  
NO-42

NO-104

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HOMEOWNERS ASSOCIATION

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In an effort to avoid this type of speculation and guesswork, former Representative Gabrielle Giffords and Senator John McCain have requested that the Air Force conduct F35A flyovers of Tucson, but this demand has been refused. Contrary to the speculations upon which the DEIS is based, we need not speculate as to why this demand was refused, since we know the reason: to fly the F35A over Tucson would be an ear-shattering experience, such that all responsible community members would oppose basing it here. We are confident none of us would make the most significant purchase of a lifetime if we were not given the opportunity to walk through that house and test all the appliances or test drive that vehicle and have our mechanic check it out. Why has Air Force forced this decision on our community without providing us with complete information?

**The No Action Alternatives assumed before the DEIS was undertaken that TIA AGS is suitable for F35A basing**

The No Action Alternatives provided are ambiguous and confusing but seem to indicate that TIA Air Guard Station (AGS) will be selected as a base for F35A aircraft under one of the scenarios. Or the No Action Alternative may mean that the F35A will not be based here. Regardless, the nature and extent of urban encroachment here makes basing the F35A incompatible with substantial portions of residential and business communities. Simply having selected TIAAGS as one of four possible sites for basing of the F35A does not make it a suitable site yet, this is what apparently is assured by the way the Air Force framed the DEIS.

Further, in addition to conceding that the analysis is not “currently ripe for decision making”, the Air Force claims beddowns of 24 or 48 F35A’s would not be cost effective, yet includes this as alternatives to future analysis to “facilitate potential future decision making.”(DEIS, p. 2-7) This contention poses two problems: first, the Air Force is required to offer alternative that are “reasonable, and second, the Air Force does not explain how this will relate to future decision making. Again the public is required to comment on this but since we are told that the alternative provided is not “reasonable” it is nonsensical and unfair.

**The F35A flight paths are incomplete, inaccurate and the DEIS deficient**

Since we reside in midtown and central Tucson and see the actual flight paths flown by ANG, we know that the actual ANG flight path is not accurately depicted in the DEIS, but also includes midtown and central Tucson. Therefore, the actual ANG flight path is

GE-2  
NO-7

DO-1

DO-32  
DO-74

DO-75

NO-62



**COLONIA SOLANA**  
HOMEOWNERS ASSOCIATION

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far more extensive than the flight path and associated “noise contours” depicted in the DEIS. Not only is ANG’s actual flight path based on our personal experience and drawn from direct observations, but ANG personnel at the Q & A on Feb. 23, 2012 prior to the public comment period admitted that ANG aircraft currently fly over midtown and central Tucson, “when directed by air traffic control”. Therefore, since DEIS does not specify the actual flight path for the F35A and assess the environmental impacts of it on midtown and central Tucson, the DEIS is inaccurate, incomplete, deficient and must be withdrawn.

In addition to not identifying the actual ANG flight paths, at the Scoping Session for the F35A, the Air Force distributed a pamphlet stating that “...a small portion of F35A training may require limited use of the flightline or other facilities on Davis Monthan AFB. Additionally, the Air Force may use airspace managed and scheduled at Davis Monthan AFB if the Air National guard is selected....” According to the DEIS “[L]ive munitions are not stored at Tucson AGS, therefore for live operations, aircraft must transit Davis Monthan AFB for weapons loading and takeoff.” (DEIS@p.TU-16). Because the F35A will carry live munitions, it will be required to depart TIA to DMAFB and have it loaded there. The F35A with live munitions will depart from DMAFB utilizing the DMAFB airspace, flightline and other facilities. Generally speaking, the DMAFB flight path is currently over midtown and central Tucson, the University of Arizona and encompasses the most densely populated areas of Tucson. Like the actual ANG flight path noted above, it is far more extensive than the flight path and associated “noise contour” delineated in the DEIS. Because the DEIS does not designate the actual flight path the F35A will take when loaded with munitions and assess the environmental impacts of it on midtown and the central Tucson, the DEIS is inaccurate, incomplete, deficient and must be withdrawn.

**The F35A flight paths disproportionately expose low income and minority populations to noise which is classified as not compatible for residential use and no mitigation is specified**

Concerning the significant issue of environmental justice and protection of children, the F35A will disproportionately expose low income and minority populations to noise that is greater than 65dB DNL (day-night average sound level), which is noise that the Air Force and the FAA have classified as not compatible with residential use. In the three scenarios described in the DEIS, Table TU3.12-2 shows that 93.7, 93.8 and 88.2 percent of the population affected by noise levels of 65dB DNL would be minority (DEIS@p.TU-119).

NO-62  
cont'd

NO-59

NP-13

EJ-4



### COLONIA SOLANA HOMEOWNERS ASSOCIATION

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The DEIS also states that "...the F35A aircraft scenario would present a disproportionately high and adverse environmental impact on low-income population."(DEIS@p. TU-120). The Air Force refuses to specify how this can or will be mitigated.

EJ-4  
cont'd

**The DEIS is required to set out the mitigation it will provide to those whose properties are rendered incompatible to use**

The Air Force has not addressed the precise mitigation it will provide to those who will not be able to use their properties as, among other things, schools, businesses, residences or the like. It is required to fully disclose mitigation in the DEIS but has refused to do so. Not only are the low income and minority populations who will be disproportionately impacted entitled to know the full nature and extent of the mitigation but so too are those who own property in midtown and the central Tucson who will be impacted by the actual F35A flight path.

NP-33  
LU-6  
EJ-4  
SO-1  
SO-18

Additionally, the Air Force is required to identify in the DEIS those unavoidable impacts that cannot be mitigated to an acceptable level so the public can comment on it. The DEIS is deficient in not identifying these impacts.

**The DEIS fails to properly consider the cumulative impacts of the F35A**

The Air Force fails to consider the cumulative impacts of the F35A when added to all reasonably foreseeable future actions. It also improperly seeks to limit future actions to those of a military nature but even in those instances provides none of the requisite analysis. For example, as to the cumulative military actions considered, the reasonably foreseeable future expansion of operations at DMAFB and Operation Snowbird are not adequately considered and analyzed. In addition the reasonably foreseeable expansion of civilian and commercial air operations at TIA, Homeland Security/Border Patrol, and drones are not adequately addressed. The Air Force has failed to analyze the cumulative impacts and specifically how the civilian and military actions will affect the same resources as those related to basing the F35A here.

CM-6

**The economic impact of basing the F35A is incomplete and flawed**



### COLONIA SOLANA HOMEOWNERS ASSOCIATION

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The economic impact of the F35A on Tucson is not fully specified. While the direct and indirect economic analysis provided is based on a formula, the Air Force ignores the negative impacts of the basing, fails to conduct any analysis respecting negative impacts on quality of life and productivity, and fails to conduct any real world socioeconomic impact analysis similar to places that already deal with extreme noise.

SO-13

The deleterious effects the F35A will have on our community are not adequately taken into consideration. For example, the F35A clearly will have a significant detrimental impact on the \$ 2 billion dollar annual tourism industry and the 21,000 jobs it generates, will threaten the viability of the U of A and the business synergies it spawns, and will damage the Reid Park Zoo and imperil the lives of its animals. In short, the lifetime investments Tucsonans have made in their homes, neighborhoods and businesses and the investments we as a community have made to revitalize downtown and in our tourism/convention business will all be jeopardized by the F35A. The F35A will cause a decline in property values for those properties under or adjacent to the actual flight path. As a result, there will be a loss in tax revenue on a state and local levels which the DEIS does not take into account. The Air Force's failure to take these negative factors into consideration in its economic impact analysis renders it flawed.

SO-1  
SO-18  
SO-7

SO-13

**Concerns remain about the ANG's credibility**

We would be remiss if we did not point out concerns we have as to the ANG's credibility. DMAFB/ANG commenced OSB in 1975 and an Environmental Assessment (EA) was conducted in 1978. Substantial changes with the aircraft deployed occurred during the period 1988-1992 which dramatically changed the program, triggering the need for a new EA or EIS. Members of CSHA and others pressed DMAFB/ANG as to whether they were in compliance with the law and they represented that they were. We continued to press them seeking the actual EA or the EIS that was conducted until we were finally informed that they had never conducted either. As a result of our efforts an EA is currently being prepared. Whether DMAFB/ANG was simply negligent or intentionally sought to evade NEPA we will never know. But we do know that this conduct does not inspire confidence and has damaged their credibility.

NP-19

**A 45 day extension is requested**

The DEIS is technical, lengthy, confusing and requires a substantial time for lay people to understand the methodology and conclusions and to formulate appropriate comments. We request that the DEIS comment period be extended 45days from the March 14 deadline.

NP-12



**COLONIA SOLANA**  
HOMEOWNERS ASSOCIATION

2195 TU

**Conclusion**

Given the nature and extent of the urban encroachment and surrounding land use, the F35A is not compatible with Tucson. Operating the F35A on the actual flight path will have grave, detrimental and irreparable impacts on the residents and their homes, schools, day care facilities and businesses throughout Tucson, particularly in the vicinity of TIA, DMAFB, midtown and the central city.

GE-4

We are entitled to full and accurate information about all the characteristics of the F35A, the actual and cumulative impacts it will have on all of our neighborhoods over which it will fly, and the mitigation required and the unavoidable impacts that cannot be mitigated. The Air Force has not been transparent and has not furnished us with all the necessary information to make an informed and reasoned judgment; it has forced us to accept speculations.

NP-13  
 DO-44  
 NP-33  
 NP-35

The F35A should not be based here.

GE-4

Respectfully submitted,  
  
 Bill DuPont, President  
 Colonia Solana Homeowners Association

- cc: Senator Jon Kyl  
 Senator John McCain  
 Congressman Raul Grijalva  
 Mayor Jonathan Rothschild  
 Council Member Regina Romero  
 Council Member Paul Cunningham  
 Council Member Karin Uhlich  
 Council Member Richard Fimbres  
 Council Member Shirley Scott  
 Council Member Steve Kozachik

MAR 14 12 05:35p Joe Coyle

215-464-8829 p.1  
2196 TU

**United States Air Force  
 Public Hearing Comment Form  
 F-35A Training Basing  
 Environmental Impact Statement (EIS)**



Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways:

- 1) Turn in this form at the comment table before you leave tonight.
- 2) Provide oral comments to the court reporter during the open house session or public hearing.
- 2) Mail, fax or email comments to:  
 David Martin, Air Force Contractor, and Kim Fornof  
 HQ AETC/A7CPP  
 266 F Street West, Bldg. 901  
 Randolph AFB, TX 78150-4319  
 Fax: 210-652-5649  
 Email: aetc.a7cp.inbox@us.af.mil

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Name: Joe Coyle  
 Organization/Affiliation: SABC  
 Address: 1009 E Weckl Place  
 City, State, Zip Code: Tucson, AZ 85704

Comments: Please support the assignment of the F-35 to the 162 Fighter Wing. Having worked in the Aerospace ID Defense industry for 30+ years I fully appreciate the importance of the F-35 to our nation's defense for the next 20 to 30 years. It is of the utmost importance to our community to continue to play a role in this deployment, recognizing the long and successful relationship Southern AZ has had with Davis-Monthan AFB

GE-3

GE-10

\*\*\*Please print - Additional space is provided on the back.\*\*\*  
 Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.  
 \*Provide your mailing address to receive future notices about the F-35A Training Basing EIS.

Final  
 June 2012

United States Air Force Public Hearing Comment Form F-35A Training Basing Environmental Impact Statement (EIS)



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Name: JOEL STRABALA
Organization/Affiliation: RAYTHEON
Address: 2429 N. DIAMOND LAKE DRIVE
City, State, Zip Code: TUCSON, AZ 85749

Comments:
I support basing the F-35 Lightning here in Tucson AZ. Southern Arizona has the best climate, airspace, range and facilities to train pilots in the F-35 Lightning.
This mission to train F-35 pilots in Tucson at the 162nd Fighter Wing is vital to our national defense, the state of Arizona, and Tucson, AZ.
BRING THE F-35 TO TUCSON, NOW!!!

GE-3

\*\*\*Please print - Additional space is provided on the back\*\*\*

Visit www.F-35ATrainingEIS.com for project information or to download a copy of the Draft EIS.

\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS

Subject: U.S. Air Force Public hearing comment - F-35A Training Base, Boise, ID.
From: Pat Brady <isgpat@idahosportinggoods.com>
Date: Mon, 12 Mar 2012 09:15:56 -0500
To: aetca7cp.inbox@us.af.mil

March 12, 2012

David Martin, Air Force Contractor
Kim Fornof
HQ AETC/A7CPP
266 F Street West, Bldg. 901
Randolph AFB, TX 78150-4319

I am writing to oppose the proposal to bring the F-35A aircraft to Gowen field in Boise, Idaho. I am a retired member of the Idaho Air National Guard and a strong supporter of our armed services. I am opposed for the following reasons. GE-4

I believe the most important function of our Defense and Air Force is to protect and save our American quality of life and property values. Locating the F-35's at Gowen field will bring extremely loud noise to over 10,000 residents in Boise threatening their lifestyle. The declaration that 6958 acres on the vicinity will be declared "unfit for residential use" will devastate homeowners property values. The assessed valuation on most of the taxing districts in the Boise area will be significantly decreased. We will suffer more in an already hurting economy. NO-36, SO-1, NO-1, LU-6, SO-1

I strongly oppose the potential noise impact on our community, and it is the responsibility of the Air Force to avoid disrupting our lifestyle and diminishing our property values by keeping the F-35's out of Gowen Field. I am sure there are better locations to locate the F-35's that would not destroy American citizens way of life and property values that they've worked a lifetime to secure. Please strongly consider more appropriate locations for the aircraft. GE-1

Pat Brady
President, Hillcrest Lane Homeowners Assn.
Boise, Idaho

Final June 2012

**Lise A. LaBarre M.D.**

Practice Limited to Neurology

March 14, 2012

Faxed to:

David Martin, Air Force Contractor,  
 and Kim Fornof  
 HQ AETC/A7CPP  
 266 F Street West Bldg, 901  
 Randolph AFB TX 78150-4319

FAX NO: 210-652-5649      Fax confirmation number at sending fax  
 machine available upon request.  
 Sending Fax number: 602-246-9596  
 Sender's telephone number: 602-246-3065  
 602-423-9596, cell

This is sent in response to a "request and welcome" from the Air Force, for comment on the Draft EIS regarding placement of F-35's at various locations.

The following is based on the information available thus far, and does not represent a complete list of comments, standings, or bases for possible future action, legal or otherwise. No rights or assumption of any rights available or potentially available to the writer are abrogated, limited, or renounced by any inference or otherwise.

I have issues with Due Process, in that, although the Air Force has had years in which it could have initiated the EIS, the NOA was published in 1/12 (not expecting the "event", I should have scanned the newspaper daily, I suppose), and "interested parties" had it made "available" (per flyer in my possession, given to me at 2/13/12 public session). Although a resident of the area, 1/4 MILE West of LAFB since 3/80 (owner since 12/79), I received only one mail item, an invitation to the February Meetings re LAFB.

NP-14

I have only had time to review the "Draft-Summary", and need respond by 3/14/12, a month after the "Meetings".

NP-12

At the local LAFB "Meetings" ("Hearings" would have had some better legal implications, etc), presentations were made, and the first half of the time allotted to "Public Comment" was granted to Politicians who repeated platitudes, and did not address the EIS. Several people left without voicing their views because they were afraid to speak up. This WAS NOT THE TIME for political posturing, it should have

NP-55

NP-5

7102 North 35<sup>th</sup> Avenue, Suite #3 Phoenix, Arizona 85051 • Office: (602) 246-3065

have been dedicated to The Public. Politicians will say whatever they feel is appropriate, or expected of them, and whatever they think is "popular". Right now, praising the "Muderland", or "Fuderland" (re-named by Bush the "Homeland") is in vogue. Entire careers have been destroyed-for example, when the City of El Mirage objected to expansion/perpetuation of LAFB. The city was ostracized by the media, spurred on by the City which gains the most from LAFB, Glendale. They had to give in, even though El Mirage knows it is essentially doomed, wrt further development. So is the area I live in, for that matter.

NP-55  
 NP-5

GE-13

A 2-page flyer (publication not numbered, but available to you, as I have it) refers to : "criteria used in the screening". The first listed is AIRSPACE (my caps).

AM-5

Whose "airspace" are you referring to?? What makes the Air Force assume it can control, ie make inhabitable by virtue of noise, etc land it does not own????? If the Air Force wishes to control the air space to the point of preventing the actual owners from using their property, perhaps it should have purchased such land some 75 years ago.

GE-13

Ie, if you are going to need 200 square acres, then please buy 200 acres, and have at it there. Enjoy.

LU-6

I don't have the square footage of each Base; Boise, Holloman, LAFB and Tucson AGB, but it is obvious that any of the proposed changes would "gobble up" acreage you don't own, but that residents have to forfeit, without compensation (?constitutional?).

Boise is lucky: the Air Force is only using 89 acres it doesn't own, but would have to give up development of 6,864 acres by your (collectively, not personally) preferred scenario. Some 9,970 people would be affected by sounds between 65 and over 85 dB. That could be devastating to a developing community.

LU-6

Holloman : The Community has already "surrendered" 7,307 acres of airspace. They would "lose" another 2,131 acres, under your preferred scenario of 72 aircraft. BUT...these acres are essentially uninhabited. There is no loss of development to the Community. Only about 44 people would be affected, vs the 49 in your "baseline" scenario. Even with 120 aircraft (likely a secret wet dream of the Air Force) only 44 people are significantly affected. As a TAXPAYER, I can afford to buy those 44 properties. The most they would control would be 2131 acres, the change in area in the H3 scenario.

GE-13

Further, since HAFB owns a large area, I don't see why more of the airspace over the Base can't be used. The runway has to be re-constructed anyhow, why not move it north-west a few miles? Land around Holloman has to be cheaper than land around Phoenix.

LU-6

Tucson AGS: encroaches probably the least on the community; 500 acres of industrial and commercial land. Again, I don't see why the runway can't be extended South-East, to lessen the impact on the residential community. Again-has to be re-done anyhow, and---wait for it---you (collectively) already own the land. Big difference.

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Tucson AGS (continued)

Even extending the runway South-East one mile would help the residential community greatly. It might even be better than what they put up with currently.

GE-13

Further, you would be keeping most of the "65 dB Sound Zones" ON property, the Air Force ALREADY OWNS. No lawsuits. No compensation, or very little. And-Tucson CAN keep on growing, because it can expand in other directions.

LU-6

Which brings me to LAFB.

Luke already "uses, controls, usurps, etc" 7,042 acres of prime development land. The description "open/agricultural" means: green fields, not contaminated (if far enough from LAFB), nice weekend-ranch 2 and 5-acre homes; some larger 10-15 acre parcels. Some bigger farmed parcels-100-200 acres.

LU-6

The area Luke has "used" is 3 times the size of Luke itself. Why didn't the Air Force buy the land it wanted to use, 70 years ago? Then I wouldn't have bought it. My neighbors wouldn't have bought theirs. The County wanted property taxes, so they allowed further division to 1 acre parcels, and the Air Force didn't object. Building permits were issued in the 60's, 70's, 80's, and the Air Force didn't object. Realtors were hoping aloud the Base would soon close, and more land was sold. Now, dozens of owners are stuck with 1 acre parcels they cannot build on, and cannot sell (can't sell less than 5 acre parcels, per '05 law).

GE-13

With the most conservative scenario considered, L3, would ask us to relinquish another 874 acres ????. There is residential development going on around Luke right now. It's just a matter of 10-12 years before Luke is surrounded by residential development. The 303 area is being developed. Communities are going up West of the White Tanks.

LU-6

We have no where else to go. Phoenix is limited by Reservation land or mountains-which we love. Check the map. Phoenix, Goodyear, etc will not stop growing because Luke is there. Eventually, common sense will win out-but hopefully not after millions of Taxpayer dollars have been spent. My 14 acres was valued at 1.4 million a few yrs ago by the assessor; it's now about 500,000.00, much less than comparable real estate not near Luke. (Parcels 501-49-011 E and D) My neighbors houses were 300,000.00-500,000.00 properties and are worth nothing now.

GE-13

Phoenix doesn't need the additional jobs; we are doing just fine. The jobs don't come near the loss in property tax revenue. Everybody is aware of that, but no one speaks up.

SO-1

We are constantly putting small businesses out of business because

GE-13

of trying to comply with Federal Air Standards-and we still regularly violate them- one day out of eight, last year.

GE-13

Phoenix is in a "valley". Dirty air accumulates here; it doesn't move very fast. Phoenix is very sensitive to pollution. I don't know that we can afford the pollution we have now.

AQ-1  
AQ-19

Even though the EIS addresses any "change" in pollution, it doesn't address which location can afford the pollution it has now. We can't really afford any unnecessary pollution....

DO-87

I have to address the L6 scenario-although this was not the "preferred" scenario. I'm sure the Air Force would not be conducting this study-at my cost- unless it is dreaming of 144 F-35's eventually.

SO-11

So you would take another 4,609 acres for your use? Can you afford to pay compensation? With that many more "operations", the L3 contour residents would not be able to live there at all. By the way, "operations", usually referred to as "sorties", by F-16's have usually included dozens of "fly-by's", or "near-landings" or "Touch-N-Go", or whatever you wish to call these "near-landings", when the jet appears to land, only to take off again. At an additional 22 dB of noise, that would not be tolerable.

GE-13

NO-1

Are you really serious????

Since you apparently do not plan on addressing the "144 jet" scenario now, when you do wish to address it, in 5-7 yrs, there will be many more than 3,739 people to be affected. People are not going to not move in an area, "in case" Luke expands further. Families are splitting properties, etc. None of this is illegal; They just move onto the "family property".

DO-87

Which brings me to the effect on recreational areas. That is one thing we have, in Arizona: lots of pristine cactus land to see, sunsets and desert, if you like that sort of thing. I don't, but it does attract a lot of city folks, resulting in tons of tourist dollars, which will soon start flowing again- but not with jets flying overhead. That is a real "mood-breaker". No where else would so many beautiful (grudgingly agreed to) areas with no noise now be devastated by noise levels of 48-65 dB". We keep passing laws to prevent noise over the Grand Canyon, and over other areas, but we should keel over, and let you destroy what we have????

NO-18  
SO-7

GE-13

Why do you want the "best"? You want your Base in this pretty little Valley. Well, newsflash-"Pretty little Valleys are made for People, not military installations-or, as I prefer, "military jackboots".

GE-1

Holloman, with the H5 scenario would give you as much flexibility,

page 5

as you think you need, at least up to 120 F-35's. Likely, the possibility of being able to "bed" that many at Holloman is much greater than it is to "bed" that many in Phoenix, once the first jets have arrived, and folks realize how noisy and unnecessary these jets are.

The EIS down-plays the possibilities of "mishaps"- In fact, we still occasionally lose an F-16. Usually, this is kept from the press. We have lost about a dozen over the last 12 years, I believe.

Do you believe you won't lose F-35's? Do you really want one falling in my backyard? Or on a school? Trust me, if one goes down-and it will- you want it to go down in the vast emptiness of Holloman, or just outside Tucson, not in the middle of Phoenix ('burbs are considered "Phoenix", for all media purposes). One goes down, and there is an outcry to close Luke, that's all it will take.

Once public opinion changes, it will change with a fury-because we really don't need Luke. And...politicians will change their tune just as fast, and with equal gusto.

Luke is so close to residential development (kissing-cousins) that we even have to re-locate a planned "Parkway" (Northern Ave Parkway) ½ mile north to not have it abut-literally- on Luke's chainlink fence.

Please, leave us whatever peace we can have. Let Luke finish serving Veterans, retired folks, the F-16's; enjoy the golf courses, send us all your retired colonels and generals and whoever else you want- we'll take care of them, we are used to older folks; we have great medical services, so send us your sick-but please keep your F-35's away!

Sincerely,  
  
 Lise A. LaBarre, M.D.

In short, I believe placement of the F-35's at Holloman or Tucson would encroach the least on the host communities, and with possible adjustment to the runways (as proposed above), have the greatest potential for long-term stability and cost-effectiveness.

Thank You  


Sorry to prolong this, but it was rather disingenuous to not mention the litigation involving Eulin, and state instead that the Air Force decided the "skies were overcrowded" over Eulin.

Finally, the EIS does not address remedy, cure, compensation to those most affected, or those who will suffer increased noise; stress from the noise, etc, or any compensation for loss of the use of their property.

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GE-1  
 SA-1  
 GE-1  
 GE-13  
 GE-13  
 GE-4  
 GE-1  
 GE-7  
 NP-33  
 NO-20

2200 HO  
 Page 1 of 9

HQ AETC/A7CPP  
 266 F Street West, Bldg. 901  
 Randolph AFB, TX 78150-4319  
 Fax: 210-652-5649  
 Email:  
 Attention: David Martin, Air Force Contractor, and Kim Fornof

Comments for the F-35A Training Basing Environmental Impact Statement

This EIS is long on pages, but short on content. This appears to be a document produced for the United States Air Force to fill a checkmark, so they can accomplish what they have already made up their mind to do. It is lacking in data current and relevant to the planned activity. I would be embarrassed to have spent so much time and energy to produce such a useless document. It would be unreasonable for any authority to endorse this EIS. It is impossible to make an informed assessment and evaluate the consequences with such vague and misleading information. I have highlighted some portions of this EIS and made some specific comments below for each identified section. My primary focus is on Vol. 1 Chapter 4 HO-Holloman AFB Alternative. In reviewing this EIS based on what I have reviewed there is insufficient information to make a valid assessment for any of the proposed locations.

**HO 2.1.1 Airfield Operations**

Holloman AFB would support 50 F-16 aircraft, 38 MQ-1 aircraft, 10 MQ-9 aircraft, 25 German Tornado aircraft, 10 T-38 aircraft, and 32 QF-4 and QF-16 drone aircraft.

- Since the identified aircraft above will be jointly utilizing Holloman, AFB and designated airspace, reference to links for the EA's and EIS's should be included in this EIS. Also a list of where hard copies of the documents can be found should be included. The baseline environmental consequences of the beddown of F-35A aircraft would not be a starting point, but would be an **addition** to the impact being caused by the above identified aircraft already in place.

CM-8

**HO-4**

The percentage of F-35A departures expected to use afterburner has been adjusted from the generalized percentage shown in Chapter 2, Table 2-6, based on local flying conditions such as airfield elevation and runway length. At Holloman AFB, 7 training events in the F-35A training syllabus have the potential for the use of afterburners during takeoff. As the training syllabus consists of 58 total training events, approximately 12 percent of all F-35A departures would use afterburner to fulfill the training syllabus.

- Considering the given field elevations (4000 feet), high ambient air temperatures, and the norm would be that the aircraft will be carrying full fuel loads. It may be possible to take off without afterburners, but not probable. Given the history of aircraft operated from Holloman AFB the norm is for aircraft to use Max power on all takeoffs.

DO-33

**HO 2.2 Holloman AFB: Airspace and Ranges**

The Air Force expects that the F-35A would operate in the airspace associated with White Sands Missile Range (WSMR), as well as ranges located at Fort Bliss. Training airspace in the vicinity

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 June 2012

of Cannon AFB would also be utilized. All F-35A flight training activities would take place in existing airspace; therefore, no airspace modifications would be required.

- The Federal Aviation Administration (FAA) ARTCC has overall responsibility for the airspace within this region. Part of the FAA's responsibility as the controlling agency, is the Letter of Agreement (LOA) between Holloman AFB, White Sands Missile Range, and the FAA. A copy of the existing documents that cover all of the aircraft identified in HO 2.1.1 and a draft of the new LOA need to be included in F35A draft EIS.

AM-15

**HO 2.2.1 Airspace and Auxiliary Airfield Use**

Restricted Area airspace overlies the air-to-ground ranges at WSMR and Fort Bliss. These Restricted Areas are owned and scheduled by each respective agency. Cooperative scheduling of this airspace by the 49 WG, Fort Bliss, WSMR, and the ARTCC has ensured the needs of all airspace users are accommodated. In addition to the F-16s, Tornados, and other aircraft based at Holloman AFB, daily users of these airspace units include the various test missions at WSMR and various Air Force and Army units. Table HO 2.2-1 shows sortie-operations in the primary use airspace units under Scenarios H1W, H2W, and H3W, and Table HO 2.2-2 shows airspace utilization under Scenarios H1 through H5. Note that certain airspace units (i.e., Cato MOA and Pecos MOA) are used by F-35A aircraft under Scenarios H1W, H2W, and H3W, but are not used by F-35A aircraft under Scenario H1, H2, H3, H4, or H5

- The EA for the F-22 indicated that the majority of training operations and supersonic flights would occur in Restricted airspace (R-5107 and R5103). The reality for the past four years is that the majority of F-22 operations have been over populated areas, not in Restricted airspace. Numerous telephone conversations with the FAA, Holloman AFB Base Operations, and WSMR have consistently resulted in the same answer: range missions have priority over Holloman Training operations. With an increase in the overall number of aircraft assigned to Holloman AFB, this will only increase the problem of the scheduling range time conflicts.

AM-16

**Auxiliary Airfields**

The Biggs Army Airfield (Biggs AAF), El Paso International Airport (EPIA), and Roswell International Air Center (RIAC) are identified as regional airfields that may allow their use as auxiliary airfields to support training for F-35A aircraft based at Holloman AFB.

Table HO 2.2-5 shows the number of airfield operations under baseline conditions and the number of airfield operations projected at the three airfields under each beddown scenario.

- Again the Federal Aviation Administration (FAA) ARTCC has overall responsibility for the airspace within this region. Part of the FAA's responsibility as the controlling agency, is to review proposed actions, Auxiliary Airfields, and its impact on the safety of the aviation community as well as the general public. I find no documentation that suggests that any review has taken place.
- I find no comments from the proposed airfields, communities, airlines, or civic leaders. Were any of these groups briefed on this plan and requested to comment?

AM-17

NP-46

**HO 2.2.3 Public and Agency Concerns**

During the scoping meetings, people were given the opportunity to ask questions and provide

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comments on the F-35A training beddown proposal. Some of the questions or concerns are summarized below:

- Where are the answers to the questions and the explanations for the comments from the public and agency scoping meetings?

NP-3

**HO 3.1 Airspace Management and Use**

**HO 3.1.1 Base**

**HO 3.1.1.1 Base Affected Environment**

The Federal Aviation Administration (FAA) ARTCC has overall responsibility for the airspace within this region and has delegated terminal Class C airspace surrounding the base to the Holloman AFB Radar Approach Control (RAPCON) facility. The RAPCON is responsible for providing ATC radar services to all air traffic operating within this airspace, to include aircraft arrivals and departures at both Holloman AFB and Alamogordo-White Sands Regional Airport. The Fiscal Year 2009 Air Force Air Traffic Activity Report indicates the RAPCON had 29,294 air traffic operations in FY2009 (Air Force 2010a). The lower annual RAPCON operations do not account for the practice runway activities that are included in the airfield operational numbers.

- The FAA as the controlling agency has a responsibility to the General and Commercial Aviation community. I see where the FAA (ARTCC) has turned over responsibility for all air traffic operating within this airspace to HAFB. Holloman takes care of Holloman, who then is protecting the public. No mention is made of other facilities in the region, as an example, the hospital medical evacuation aircraft, forest service aircraft, Ruidoso's airport. When the Holloman AFB Public Affairs has been contacted about an incident involving the operation of an F-22 they are always within their airspace, no further action is required. It appears to me this is the fox guarding the hen house. The FAA needs to provide oversight in airspace that is over populated areas and is shared with civilian aircraft. The FAA should also be evaluating the type of operations being conducted in this airspace. The proposed type of pilot training and supersonic flight should **never** be permitted in this airspace.

AM-18

AM-19

**HO 3.2 Noise**

Different noise measurements (or metrics) quantify noise. These noise metrics are as follows: DNL (Day-Night Average Sound Level) combines the levels and durations of noise events, the number of events over a 24-hour period, and more-intrusive nighttime noise to calculate an average noise exposure.

- This is ridiculous to say an ear splitting sonic boom that shakes the very foundation of my home is justified by averaging in 20 hours of low level noise. This is not a scientific approach to noise evaluation; this is an attempt to dumb down the numbers to fool the public into thinking that their lawn mower is louder than the F-35A.

NO-13

NO-57

NO-4

**Table HO 3.2-1. Representative Aircraft Noise Levels Comparison**

F-22  
(Military power)  
Departure 100% ETR 0 0 5,410 96

F-35A  
(Military power)  
100% ETR 0 0 5,410 89

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T-38A 100% RPM 0 0 5,410 87  
 Tornado 100% RPM 0 0 5,410 94

- Do you really expect me to believe that the F-35 engine at over 40,000 lbs of thrust is only 2db louder than the two GE J-85 engines in the T-38A? Few area residents ever hear the T-38 takeoff, yet some do hear the F-22 and other aircraft at takeoff from Holloman AFB. Recently while F-35A aircraft were flying out of Holloman, I could clearly hear the departing aircraft. In fact the F-35 aircraft were noticeable louder than the F-22 aircraft. What is needed is an independent, unbiased agency to conduct a real noise study to provide the public with accurate data. The United States Air Force pays a considerable amount of tax dollars for an EIS. The Air Force and the public deserve a professionally produced, scientific document not pages and pages of useless information.

**HO 3.2.2 Airspace**

**HO 3.2.2.1 Airspace Affected Environment**

Sonic boom noise levels were calculated using the BOOMAP program. Under baseline conditions, sonic boom noise levels do not exceed 62 dB CDNL under any primary use airspace unit. The Beak MOAs do not permit supersonic flight operations, but Cowboy ATCAA, which overlies the Beak MOAs and extends horizontally to the west of the Beak MOAs, does permit supersonic operations. The average number of sonic booms experienced on the ground near the center of each primary airspace unit is 1.8 or fewer per day under baseline conditions. Areas distant from the center of the airspace units receive fewer sonic booms on average. Supersonic flight is also not authorized in Talon MOA or on MTRs.

**Table HO 3.2-4. Noise Environment for Holloman AFB Primary Use Airspace, Baseline Conditions and F-35A Beddown Scenarios**

- This section on sonic boom noise has more useless filler material. If you did a seven day average on a week with no flying on Saturday and Sunday you would be able to dumb down the numbers further. The purpose of this EIS is to provide meaningful data for the purpose of doing an evaluation of the impact. To include DNL or CDNL with an explanation is fine, but what is missing is real data. Identify the parameters of the test. What was the altitude of the aircraft MSL or AGL, ambient temperature and humidity, how was the aircraft configured, was the aircraft maneuvering (focused boom), the liner distance from the collection point. Then multiple test flights should be conducted with aircraft being operated at the minimum altitude and at the maximum altitude at various distances from the collection point. Put an end to the garbage of noise levels that don't exceed 62 db CDNL, "distant thunder". Tell the truth, if the Air Force has its way F-35A aircraft will be sonic booming the people just like the Fifth generation F-22 aircraft. People are calling the police reporting an explosion, car alarms are being set off, windows are being broken, animals stampeding, children seek cover under desks and playground equipment, people get nose bleeds, and the list goes on and on. Nowhere in the world are sonic booming people considered acceptable. The United States Air Force and NASA have conducted studies on sonic booms, why is that information not part of this document? You can type "sonic boom noise" in any internet search engine and find more current information about sonic booms and the effects in fifteen minutes than what is contained in this EIS.

**Auxiliary Airfields**  
**Biggs AAF and EPIA.** Under all Holloman AFB beddown scenarios, Biggs AAF and EPIA

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NO-1  
 NP-15  
 NP-32

NO-57  
 NO-4

NO-109

NO-12  
 EJ-4  
 BI-5  
 NO-6  
 EJ-6

NO-108

2200 HO

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would be used for practice approaches by F-35A aircraft. Because the two airfields are close to each other, noise generated at one affects noise levels at the other, and noise impacts at the two runways are discussed together. However, as different (but adjacent) areas are affected by noise generated at the two airfields, separate impact analyses were run to allow the areas of impact to be clearly distinguished. Noise contours under Scenarios H1, H2, H3, H4, and H5 at the two airfields are shown in Figures HO 3.2-9, HO 3.2-10, HO 3.2-11, HO 3.2-12, and HO 3.2-13, respectively, overlaid on baseline noise contours. Scenarios H1W, H2W, and H3W would be exactly the same as Scenarios H1, H2, and H3 in terms of F-35A operations and noise generated at Biggs AAF and EPIA.

**RIAC.** Under all Holloman AFB beddown scenarios, RIAC would be used for practice approaches by F-35A aircraft. Noise contours under Scenarios H1W, H2W, H3W, H1, H2, H3, H4, and H5 are shown in Figures HO 3.2-14, HO 3.2-15, HO 3.2-16, HO 3.2-17, HO 3.2-18, HO 3.2-19, HO 3.2-20, and HO 3.2-21. In all figures, noise contours associated with the beddown scenario are overlaid on baseline noise contours. The area affected by noise levels greater than 65 dB DNL would increase by approximately 781, 633, and 1,192 acres under Scenarios H1W, H2W, and H3W. Area exposed to noise levels greater than 65 dB DNL would decrease under Scenario H1 by 277 acres, but would increase by 435 acres, 1,042 acres, 1,592 acres, and 2,102 acres under Scenarios H2, H3, H4, and H5, respectively (see Table HO 3.2-7). The estimated number of residents affected by noise levels greater than 65 dB DNL under Scenarios H1W, H2W, H3W, H1, H2, H3, H4, and H5 would increase by 108, 194, 297, 5, 103, 186, 307, and 497 persons, respectively. Persons exposed to increased noise levels, particularly those exceeding 65 dB DNL, may experience increased annoyance and activity interference. No persons live within the 80 dB DNL noise contour at RIAC under any scenario; therefore, according to standard Air Force potential hearing loss risk assessment methodology, hearing loss risk would be minimal.

- Again, what is needed here is simple: What is the max db at a given distance from the runway with the aircraft being operated in a worst case scenario? (Max payload of 18,000 lbs, max fuel load, cool damp morning, short field takeoff) Then do a best case scenario or comparison to a relevant known standard. For example a fully loaded passenger aircraft taking off from the same airport under similar conditions. Also, include what the normal training syllabus scenario would call for under various conditions and time of day.

**HO 3.3 Air Quality**  
**HO 3.3.1 Base**  
**HO 3.3.1.1 Base Affected Environment**

**Table HO 3.3-1. Annual Emissions for Otero County, New Mexico, Calendar Year 2008**

**Table HO 3.3-2. Annual Emissions from Operations at Holloman AFB, Calendar Year 2003**

- The above referenced tables are 4 years and 9 years old, respectively. These would not include emissions from fifth generation, F-22 aircraft, unmanned aerial platforms, and T-38 aircraft, all which are currently conducting operations at Holloman AFB. This document should be using current, relevant data for the purpose of this study. Residents can see the decline in air quality since the arrival of F-22 aircraft, Reapers, and Predators. Current conditions need to be identified.

**Airfield Safety**

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NO-13

AQ-21

Mishap rates are statistically assessed as an occurrence rate per 100,000 flying hours. Table HO 3.4-1 reflects the cumulative annual Class A mishap rates of the F-15, F/RF-4, F-117, T-38, and F-16 for the periods for which accident records have been established. These Air Force aircraft have been or are currently based at Holloman AFB. The F-22 was the newest aircraft based at Holloman AFB, and has not yet flown 100,000 flight hours to establish an official Class A mishap rate; therefore, the rate is based on the number of hours flown to date. The F-22 has a higher accident rate than the other aircraft due to its shorter history and lower amount of recorded flight hours (approximately 94,000 hours). The F-35A does not have enough flight hours to estimate a Class A mishap rate.

**Table HO 3.4-1. Class A Accident History**

- Based on the current data for fifth generation aircraft (F-22), the concern should be that the F-35A would have a similar rate 6.35 per 100,000 hours. What makes this a major concern for this EIS is that the proposal is for the F-35A to accomplish the majority of its training directly over civilian populated areas. The fact is; is that fifth generation aircraft have a much greater potential for accidents than legacy aircraft, coupled with increased size and payload of this aircraft push the risk factor up. To ignore the risk with a statement that the F-35 does not have enough flight hours for an estimate, is pure negligence.

SA-30

**HO 3.6.2.2 Airspace Environmental Consequences**

**Low-Level Overflight and Noise.** All airspace units that would be used for F-35A training are currently used as active military airspace by military jet aircraft, including F-16s, A-10s, and, until recently, F-22s; therefore, no new types of impact would be introduced into these areas as a result of introducing the F-35A aircraft. The sudden visual appearance of the aircraft and onset of noise from a low-level overflight has the potential to startle wildlife. Both the visual appearance and noise levels of aircraft diminish rapidly with increasing altitude.

- "No new types of impact would be introduced into these areas", is not an acceptable approach. The current abuse of the public is demonstrated by the increase in complaints to Holloman Public Affairs since the arrival of the F-22. To consider an increase of over 10 percent for something that should not be permitted is wrong. It time that the FAA and the USAF have some respect for the people they claim they are protecting.

BI-25

GE-13

**HO 3.6.2.2 Airspace Environmental Consequences**

**Sonic Booms.** The sound of a sonic boom can be like thunder: either a sharp double clap if the aircraft is directly overhead or a distant rumble if the aircraft is at a distance. The intensity of the boom (overpressure) at the Earth's surface decreases with an increase in the altitude at which the aircraft goes supersonic. Overall, studies of wildlife and domestic animals have demonstrated that behavioral responses are of short duration and rarely result in injury or negative population effects (Krausman et al. 1998; Weisenberger et al. 1996). Habituation to more-frequent sonic booms may also occur (e.g., Ellis et al. 1991; Workman et al. 1992). Habituation to thunderclaps and rumble associated with seasonally frequent thunderstorms within the ROI is also expected to minimize the response of birds, mammals, and domestic animals to sonic booms.

- The referenced paragraph above is a copy paste out of the F-22 EA. It may have fooled some of the people at that time. The majority of people living under the airspace, which was taken by the Air Force, had never heard a sonic boom. It is a different story today for the people of southern

DO-72

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New Mexico that are suffering the effects of the hostile takeover by Holloman. Your references to documents dating back to 1991 simple do not apply. After four years of abuse by the USAF and its fifth generation fighter leave little doubt in the minds of many that supersonic flights over populated areas are criminal. If the preparers of this document wanted some real data they should take the time to visit schools and talk to the frightened children that say these airplanes don't belong here, or those that have large animals and livestock that fear for their lives if caught in closed area with animals driven wild due to a violent sonic boom. This is something that does not occur with distant thunder. Go to Las Cruces, New Mexico a city that is not even part of HAFB training airspace, but sonic boomed to a point people have called emergency services to report an explosion. It has been reported that the F-22 aircraft are transferring from Holloman AFB. I have only two comments: Good and Not soon enough. I have never had a problem with supporting our armed services and I believe they need to be properly trained and equipped. As for the F-35A it seems to be overpriced and overrated, but if the military feels they are needed that's OK with me. It is the placement of these aircraft that's an issue. They need to be bedded down in some remote location far from people and animals. If the Air Force thinks they are going to beddown some of these aircraft at Holloman it is time for every man, woman, and child to rise up and march against Holloman AFB and shut that place down!!! If they cannot peacefully coexist with the civilian population, that pays for them, then take your F-35A, F-4's, T-38's, Reapers, and Raptors and GO!!!

DO-72

NP-54

GE-13

DO-5

GE-4

GE-13

**HO 3.8.1.2 Base Environmental Consequences**

No known federally listed threatened or endangered wildlife species or their habitats occur on Holloman AFB; therefore, no adverse effects on federally listed wildlife are anticipated from implementation of the F-35A aircraft scenarios at Holloman AFB. Because the proposed construction areas on Holloman AFB are located in previously disturbed areas, no significant impacts on other sensitive species observed on base or that may occur on base would result from proposed construction of project facilities. Should burrowing owls or other state species of concern be detected at Holloman AFB where construction would occur, appropriate consultation with the NMDGF would be undertaken and measures to avoid potential adverse impacts on the species would be conducted.

- The endangered species that should be considered first is the people of New Mexico. Remember the people were here before the military. Holloman AFB and the military personal are here to serve this great nation, not take it over and occupy. For decades the military and public have benefited from a mutual agreement. The United States Government, the Military and those that have approved the EA for the F-22 and those preparing this EIS have betrayed the American people.

GE-13

**HO 3.11.1.1 Base Affected Environment**

**Population.** In 2010, Otero County was ranked as the ninth most populated county in New Mexico, with a total of 63,797 persons, and accounted for approximately 3.1 percent of the total population of New Mexico (see Table HO 3.11-1) (USCB 2010a).

- The latest Census data for Alamogordo reflects a reduced number which probably is associated with the beddown of the F-22 and would be expected to continue on this downward spiral if the F-16 and F-35A aircraft are bedded down at Holloman AFB.

SO-49

The recent recession and decline in housing values has had an impact on the real estate market

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and housing values. The recession has resulted in falling sales prices. These lower sales prices would be reflected in the comparable sales evaluation of the market value of properties and result would in lower property values.

- To try to blame the decline on the recession is debatable. The growth of Alamogordo is centered on the influx of elderly people that favor the southwest weather, lower population density, and open peaceful spaces. This people group is mobile because their income is based on retirement funds. As the environment becomes more hostile they simply move. As word spreads of the abuses of the residents of Alamogordo by Holloman AFB he hope of attracting newly retired folks will become more difficult. There is also an increase in the departure of employed people that have been forced to seek employment elsewhere return to a normal life style.

SO-51

NO-36

**Total Employment.** Total employment in Otero County in 2008 was 28,216 jobs. Between 2006 and 2008, employment grew at an average annual rate of less than 0.5 percent. Government and government enterprises industry has a total employment of 10,257 jobs; followed by retail trade, with 3,137 jobs; and health care and social assistance, with 2,650 jobs (BEA 2010).

- Again a growth in jobs but a decline in population points to something other than economics. The school system has not changed, the job market is steady, more housing than people with over 1,000 units available. So what has changed significantly in the past three years, it is the sonic booming of the people by the air force.

SO-52

**Scenarios H1W, H2W, and H3W**

**Employment and Population.** Potential socioeconomic impacts from construction expenditures and the change in personnel due to F-35A Scenarios H1W, H2W, and H3W are summarized in Table HO 3.11-4.

The majority of funding for this project will fall into the hands of select few. The employment is short term, once the construction is over the people are gone. Most will be renters and much of their disposable income will be spent out of town. As in the past what is perceived as new employment is only a shifting of people that were already employed to a better paying job while it lasts. I have also seen commuters from El Paso, Texas and Las Cruces because it is on average a 1 hour commute. A lot of this is purely speculation. What we do know for sure is that the million dollars generator Holloman AFB and the F-22 EA predicted economic boom were replaced with sonic booms. Facts: more houses on the market, more businesses closed their doors, and a decline in population. We have seen an inverse reaction, the greater the Holloman aircraft increase the larger the decline.

SO-21

SO-34

SO-1

**HO 3.12.1.2 Base Environmental Consequences**

The consequences to environmental justice and protection of children are presented separately under each F-35A aircraft scenario. There are some common elements to the analysis.

No disproportionately high and adverse human health or environmental effects on minority or low-income populations have been identified as a result of construction activities on Holloman AFB. Construction would occur within the Holloman AFB cantonment area and would not affect off-base populations.

Residents within the 65 dB DNL noise contour could be significantly affected by the increased noise.

- The 65 db DNL is a garbage number and has no meaning. Residents are not being exposed to 65 db's. The maximum db exposure of a sonic boom is real number that is controlled by a number of factors. Size of the aircraft, flight profile, temperature, humidity, linear distance from the aircraft and is the person indoors or outdoors. Common sense would tell you that

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**no matter how many hours of silence you try to factor in THE MAXIMUM db EXPOSURE IS WHAT IT IS and it is not 65db unless the aircraft is at FL60 on the other side of the county.**

- As I stated before people should be informed what the Maximum db exposure would be if this were an honest effort to inform the people. When you look at a weather forecast you will not find the average temperature for the day your find the High temperature and the Low temperature for the day.

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Sincerely,

Voice of Integrity

Mr. Schuster

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2200 HO

HQ AETC/A7CPP  
266 F Street West, Bldg. #901  
Randolph AFB, TX 78150-4319  
Attention: Mr. David Martin, Kimberly Fornof

RE: F-35A Training Basing Environmental Impact Statement (EIS), Holloman AFB, New Mexico

To: HQ AETCA/A 7CPP — Mr. David Martin, and Kimberly Fornof,

I am taking this opportunity to comment on the F-35 Training Basing Environmental Impact Statement, (EIS). This F-35 EIS is severely flawed and should not have progressed this far in the NEPA process. It does not provide the comprehensive information that a research document should contain, nor does it contain the accuracy required of such a document. Tax dollars should not be used so a contractor can produce a document that is significantly insufficient and flawed for a major project or any comparable project. The AF is contracting with the same company which has produced similar documents for other AF projects in this area of NM and is accepting this type of work that fails to provide the true picture of significant negative and adverse effects in many areas and which provides limited information that should have been included in this EIS.

NP-13

NP-47

Environmental studies such as this EIS should be based on common sense, and be fair and objective, free of biased views, but that is not evident in this EIS document. This EIS contains vague comments, discrepancies, generalizations, and conveniently minimizes and even ignores adverse impacts of the F-35 proposed project. There is an over all failure to address negative impacts in many areas. Those responsible need to be accountable for projects that go forward while having significant impact on the human and natural environment. The people of many NM communities continue to be affected from other projects compiled in the same manner that this EIS for the F-35 was conducted. The program manager for this F-35 project was also the manager for the F-22 project that came into our area when it shouldn't have. He is well aware of affects such projects are having in our communities. He was present at the F-35 scoping meeting in this area.

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People currently being negatively affected by some Holloman AFB missions are experiencing firsthand what occurs when major projects enter communities without proper process and procedures being followed appropriately and where the public was left out of the right to participate in the NEPA process. Citizen involvement is crucial in order to protect the public and communities from adverse affects from Major Federal Projects. Lack of disclosure and transparency has been evident in major projects entering NM communities.

GE-13

This F-35A EIS has had limited distribution among the general public and your office is aware of that fact since I brought this to your attention. In New Mexico, the February 2012 comment meetings were held in only 3 communities: Alamogordo, NM, Roswell, NM, and Weed, NM which is a small mountain community. This being the case when approximately 15 counties are expected to be impacted in NM and Texas. Some will experience more direct impact due to their being in "primary" air space. Furthermore, the document lists NM counties that will be affected if this project is placed in the Tucson, AZ area, that information should have been revealed somewhere under the NM impacts or a separate study should have been performed for this area. This EIS process should be stopped and all potentially affected communities should be included in the EIS process.

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NM residents at the Alamogordo, NM F-35 comment meeting were not given the opportunity to speak orally and address the group present on the night of the meeting February 9, 2012. At no time was the public informed that they had to sign in; in order to speak publically. Those who chose to comment orally had to do so "on the record" at the table with the AF Col. from Washington and the woman, court reporter. Why was this done in Alamogordo, NM when other cities that had comment meeting were able to speak orally? Many spoke in AZ, and ID, and Weed, NM. Comments of some residents' were quoted in the media as to concerns that had been expressed at the comment meeting in their area.

NP-49

This EIS document wasn't available in a timely manner either online or at the public library. Therefore it wasn't available for public review at the time when it should have been available. Your office was notified of this. If the document isn't available, it makes it difficult for the public to exercise their right to participate in the NEPA process. When such a project is not publicized appropriately, that also makes it almost impossible for the general public to participate. The chosen individuals and agencies on your formal distribution have the privilege of sufficient

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notice and involvement, if they wish to participate, on all projects, while the general public and taxpayer citizens are almost always left out of the NEPA process, unless watchdog groups or individuals inform the citizens about a current project. Even when the citizenry find out about these projects, their participation is often unwelcome, as has been my experience and that of others.

There are approximately 15 counties on the Holloman AFB, NM EIS section that would be impacted. There are also NM counties that will be impacted if the F-35 is located in the Tucson area and those are listed in the Tucson section. All of the counties are in part of the proposed airspace that the F-35 will potentially use. With that in mind, residents in these counties should have had appropriate public notice, and should have had the EIS available for at least 45 days within their community for the opportunity to review and comment on it. They should have had comment meetings held in proximity to their communities so that they would have opportunity to participate in the NEPA process. I myself was left out of the distribution process, although I had participated in the initial scoping meetings and should have been on the distribution list. As a result of the problems encountered, I was unable to have the privilege of the full review time in which to examine this EIS. I had to ask for the document and time elapsed while I had to wait for it to arrive. The comment period should be extended for full participation by the public in communities that will potentially be affected by the F-35 project in NM. The document is extensive in size and while the AF and involved agencies had sufficient time to compile it and study it, the public has not had that opportunity. The majority of the public that have the potential to be affected were left out of the NEPA process. Scoping meetings in 2010 also failed to encourage adequate citizen participation due to the lack of appropriate exposure and publicity of the project. As a result there was low participation in NM scoping meetings.

**FAA:** The EIS mentions that the Federal Aviation Administration (FAA) is responsible for the airspace in this region. It also mentions the role of the Holloman, RAPCON, Radar Approach Control facility. The FAA and the AF are responsible for problems that communities are experiencing due to their allowing airspace over whole communities to be turned into military

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ranges through "enhancements" the AF made to its air space during the time just prior to the F-22 arrival. The public had no way of knowing what would become of their communities due to this action on the part of those involved in these airspace enhancements. There has been continued lack of disclosure. The public can't become involved when such actions aren't fully disclosed. The adverse affects from such decisions has been significant. What can't be done elsewhere is being done in NM over populated communities. Now, the F-35 project proposes that this aircraft do what other aircraft are also doing over the general public. This action has to be questioned. No other aircraft should be allowed to adversely affect NM communities.

The EIS doesn't include FAA documents regarding "waivers", or letters of agreement for the F-35. The EIS states that the waivers are aircraft specific. The EIS document should include the F-35 waiver as well as the waivers and letters of agreement, for other aircraft that are currently operating out of Holloman AFB, NM according to the F-35 EIS. Including those for the F-22, F-16, Predator and Reaper, FQ-4, F-4C, QF-16 Drone, F-15E, F-4, OH-58D, and any other aircraft that is training, testing, and or using military weapons, including sonic booms as part of its training over NM populated areas including private and public lands.

**The following are some of the areas of concern:**

Holloman was evaluated for various scenarios including the F-35 presence with or without the F-16 proposed project. In one scenario up to 120 F-35 aircraft would be in the area. It will be injustice to place any number of F-35 aircraft in NM where such aircraft would be conducting flights, combat training, and sonic booms over tens of thousands of NM citizens, private, and public lands.

**Unavoidable Impact:** The EIS states some adverse and annoying impacts could occur that cannot be mitigated. It also mentions that F-35 activities are "projected to result in disturbance and/or noise within areas not previously or recently subjected to those effects. To the extent practicable, mitigation measures would be applied to reduce potential effects to acceptable levels."

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	2200 HO
<p>"Unavoidable, adverse impacts are impacts identified during the public and agency review of the Draft EIS that cannot be mitigated to an acceptable level. Such unavoidable, adverse impacts would be identified for decision makers in the Final EIS and Record of Decision."</p>	GE-13
<p>This project has been in the works for several years now, these statements claim that "unavoidable adverse impact" those which can't "be mitigated to an acceptable level" will be identified by decision makers in the Final EIS and Record of Decision. If the "decision makers" are so certain that these types of adverse effects will surface, then this documents release should have been delayed. The public doesn't need more unknowns about this F-35 project. It appears that all direct, indirect, and cumulative impacts should already be identified in the Draft EIS that the public is currently commenting on and should have already been evaluated within the EIS document. There is no mitigation for adverse affects from 5<sup>th</sup> Generation, experimental, unproven, aircraft such as the F-35 and F-22.</p>	NP-33 NP-13 CM-7 DO-44 NP-33
<p>Affected communities that have been living with negative impacts from 5th Generation F-22 aircraft and modified aircraft, that are conducting combat training and other military activities over populated NM lands, are well aware of the lack of mitigation in these situations. Citizens have not seen mitigation efforts take place in affected NM communities which would protect the public and their environments from adverse affects from these projects. Some of these projects continue to expose the citizens to harmful impacts that should have never been allowed to take place over populated areas in NM. The proposed F-35 mission would be no different.</p>	NP-33 EJ-1 NO-6 NO-20 DO-27
<p>As per NEPA, should these adverse affects or other unknowns surface which impact the human environment, a Supplemental EIS for this F-35 EIS will be required. The full range of impacts should have already been addressed in the document detailing information on the F-35 aircraft proposed project. An EIS should have been done for other Holloman major project as well instead of flawed and insufficient Environmental Assessments when NEPA requires an EIS. Some Holloman projects that involve aircraft don't appear to have any available environmental studies. No surprise what is taking place in a once beautiful area of NM that is now very adversely affected due to military projects.</p>	DO-81
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	2200 HO
<p><b>Aircraft:</b> The F-35 aircraft should not be allowed to train and fly over populated NM private or public land areas. The characteristics of these aircraft and pilot trainees have no place over NM populated communities. The interests of the public, including their health, safety, and welfare, need to be considered and addressed appropriately. The EIS states the F-35 is a new weapons system; therefore existing data for operations is unavailable. New Mexico residents have already been exposed to new weapons systems, experimental and unproven. Some concerned citizens don't want another new weapons system over their properties and communities. The citizens have rights that must be protected and certainly concerned citizens will see to it that their rights are upheld and protected. If it has to be placed somewhere, don't place it in NM. Place it where it won't affect tens of thousands of people and where it will train in an isolated range without intruding upon the life and environments of the public. NM has many residents throughout the counties and cities that will be affected if the proposed project was placed in the NM area. This action would be complete disregard for our communities and residents and our private and public lands. The other considered locations wouldn't have the F-35 taking over such areas with vast amounts of people located under the airspace of whole communities. NM land and its residents should not be placed in such a situation.</p>	GE-1 SA-12 GE-1
<p>The F-35 EIS left out the F-22 Raptor from the majority of evaluations stating that the F-22 left recently, or mentions the F-22 in a past tense mode, although it is mentioned briefly in various places. The F-22 should have been included in all evaluations and charts since this project was started over 2 years ago and the F-22 was present then and is still an aircraft that is based at Holloman AFB, NM and its presence continues to affect many communities negatively. Furthermore, there has been contradictory information regarding when and if the aircraft is leaving the Holloman area for years now.</p>	DO-83 GE-13
<p><b>Air Space and use:</b> The EIS for the F-35 at Holloman AFB, NM states that current airspace and ranges will be used with no enhancements for this proposed project. Airspace that the F-35 would use includes area over 12 NM counties and some TX counties. Large areas over populated NM lands including many counties where the people reside are included in the flight space being called "primary airspace" in the EIS and the F-35 would use this airspace on a daily basis according to the document. This primary airspace would also include more sonic booms than what would take place in restricted areas such as WSMR, NM and is stated in the EIS. This has been evident as well with the F-22 project where the populated communities</p>	GE-13
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including thousands of people are exposed to more flights and sonic booms than some restricted airspace. The F-35 will be using the same air space current aircraft are using and will be adversely affecting lands and populations in the same manner that current Holloman AFB aircraft are doing at this time. The reason no "enhancements" are needed is because the air space currently being used by Holloman AFB aircraft already includes large "enhancements" of air space over NM land including private property and public lands. It includes air space taken by the AF in order to increase its air space and ranges for the F-22 beddown just prior to the F-22 arrival. The AF already had enough NM land to train and test in. The taking of airspace for use by the AF did not provide the citizens and general public with appropriate disclosure and this AF and FAA action has been behind significant problems that many communities and residents of those communities continue to experience. The AF didn't publicize to the NM public that they would be turning the air space over public and private property into their range, and there was a lack of disclosure as to what the public and their environment would be exposed to and to what degrees. The rights of the people are being violated by this action that is on going and now yet more degradation may take place if the F-35 is allowed to enter NM and use this air space. The AF and FAA are aware of these problems, but continue to ignore public concerns relating to this problem and the source of the problem. Both the human and natural environment has been significantly, negatively affected because of the militarization of the air space over whole communities and NM lands. NM lands, animals, and people are being exposed to military combat training and testing. This military action is being done over tens of thousands of people and has not been done before with a 5<sup>th</sup> generation aircraft, modified aircraft, or any other aircraft in. The air space currently being used was never used for such purposes prior to the F-22 mission. Now combat weapons and aircraft super cruising over communities that include homes, schools, work places, hospitals, etc., is taking place and chaff and flares are being used in this airspace as well. This should not be happening to NM and its residents. This air space is now used by all Holloman aircraft and transient aircraft. With the F-35 proposed project, yet more acreage would be affected from increased noise effects including sonic booms and residents in some of those areas have not been included in a process that would disclose what is planned for their cities and counties. This air space would be over at least 12 NM counties and several in Texas. Other NM counties have the potential to also be affected if the project is placed both in NM and AZ. This is unjust. Sonic boom activity over masses of land and people as what is taking place in our state of NM over populate areas isn't occurring in other areas including those on the list for the F-35. Why is NM

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land and residents experiencing this? No community regardless of size should be exposed to this type of military activity where jet noise, pollutants, sonic booms, and other military weapons are being used in airspace over communities. Furthermore, it has created problems for civilian aircraft and has created problems since civilian aircraft are often flying at low levels directly over residential and other areas of communities. The EIS states that data is not always maintained for ATCAA's. Why is data not maintained for these areas since it's airspace over private and public lands?

**Aircraft Safety:** There safety risks which can have catastrophic consequences to the public and the environment especially now that airspace "enhancements" the AF made turned the airspace taken over populated areas into military range for various operations involving many aircraft. These enhancements were made for the F-22 training without the AF conducting comprehensive Environmental Studies. An EA was done with "FONSI" when per NEPA a comprehensive EIS should have been required of this major project involving a new, 5<sup>th</sup> Generation aircraft. These enhancements which allow for flight over populated areas continue to be a source of problems. The F-35 is a controversial aircraft that has exhibited sufficient problems that could pose safety risks to the public that will be under airspace in which the aircraft trains if located to NM. Certain training has no place over populated areas and safety will continue to be an issue unless changes are made that don't allow the flights over populated areas. Aircraft from Holloman trained for years without negatively affecting communities since they didn't conduct their combat training and testing over populated areas including private and public lands. There have been various Holloman aircraft crashes in the recent past including UAV crashes and the FQ-4 in a NM community, as well as grounding of some F-22 aircraft in the recent past due to problems associated with that aircraft which may have contributed to an aircraft crash in Alaska in which the pilot was killed. The F-35 has also experienced various problems that are a cause for concern. NM communities shouldn't have this type of 5<sup>th</sup> Generation aircraft training pilots including foreigners over its land and populated areas. Aircraft crashes have no place over populated areas.

**Noise:** The EIS contains generalizations, vague information, and discrepancies regarding noise levels. The noise associated with the F-35 will have wide impact regardless of where it is located. Annoyance is but one factor involved. Noise from the F-35 will impact the health and well being of individuals in affected communities, as well as structures, and the environment.

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<p>There is current research on this subject that wasn't used for this EIS. The negative impact will extend to cultural, biological, land use, and socioeconomic resources. There is neither respect nor regard towards the potentially affected communities in this EIS. The AF and its contractor are detached from what this proposed project will do to affected communities. The averaging methods used to calculate noise on this proposed project that the human and natural environment will be exposed to and significantly affected by is ridiculous and an insult to the intelligence of many citizens who are concerned over the degradation of our state due to militarization efforts including dangerous noise levels which the citizenry and their environment is being subjected to. The method adds further to inaccuracies found within the EIS document. The use of this method keeps many of the proposed noise levels safely within what is acceptable to the DoD, EPA and FAA in areas where the public, residential housing and schools in potentially affected communities are involved. Realty is that the affected communities will be exposed to harmful noise levels which would make many of the affected communities unfit to live in. Already, many NM communities are exposed to severely harmful levels of noise due to the F-22 and other aircraft overhead private and public properties in taken airspace for military activities. NM residents have first hand experience on this subject since this area has been exposed to harmful and intrusive noise from the F-22 aircraft and other Holloman aircraft using airspace over private and public lands in Southern NM.</p> <p>The dangerous noise levels many NM residents are familiar from sonic booms with can shake structures, people, and animals, rattle and break windows, crack and break hard surface counters like granite, and physically harm the people and animals under the noisy airspace, startle and even create fear response. Other dangerous noises from over flights pose harm as well. The affected communities and public deserve transparency and full disclosure of the realities of this proposed project. .</p> <p>Holloman AFB, NM is not currently nor would they, under the proposed plan, be exposed to the same noise pollution as residents of many New Mexico communities including children, elderly, minorities, the poor, and all other people groups.</p> <p>Noise impacts to area communities in vicinity of Holloman AFB, NM are minimized in the EIS. More than the 49 residents the EIS mentions will be affected by noise 65 dB DNL in off base</p>	<p>2200 HO</p> <p>NO-108</p> <p>GE-13</p> <p>NO-2</p> <p>NO-4</p> <p>NO-28</p> <p>LU-6</p> <p>NO-8</p> <p>BI-5</p> <p>NO-12</p> <p>NP-35</p> <p>EJ-4</p> <p>NO-2</p>	
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<p>areas contrary to what the EIS says. Estimated affected residents are inaccurate information. Noise levels are reportedly under 75 dB DNL among affected areas on and off installation.</p> <p>The F-35 project for NM states that operations must be conducted 24 hours per day which includes the "environmental night" that includes the 10 point decibel penalty. This noise at hours when people and animals are usually sleeping or resting will affect tens of thousands of residents and their environments negatively. The EIS section for Tucson doesn't allow for flights during the "environmental night" — 10:00 p.m. to 7:00 a.m. Why is it required if it is placed in NM? Aircraft should not require flight time around the clock for the purpose of training. Pilot trainees should not be over populated private properties and public properties at all hours of night either. The health, safety, and welfare of the citizens have the potential to be impacted.</p> <p>A noise effect on charts and conclusions for bases and off/on residents reflects the poor quality of the EIS document with the continued lack of addressing of negative impacts and adverse affects. "No off installation resident would be affected by noise levels at which the risk of hearing loss is considered to be significant." What nonsense, since these averaged noise levels mean nothing to those who already know the realities of what impact dangerous aircraft noise is already having on health, properties, environment and quality of life and other factors.</p> <p>There is sufficient contradiction in the effects noise will have depending on different scenarios. Noise from the F-35 will be incompatible with normal living and activities in any of the potentially affected communities or other involved private or public lands under any circumstance and scenario.</p> <p>Animals, both wildlife, livestock, and companion animals should not be exposed to the noise associated with F-35 aircraft or other aircraft that is using airspace over whole communities, private, and public lands. It is detrimental to their existence. The affects to birds, and animals of various types has already been evident due to the noise pollution and military activities in some NM counties. The sonic boom noise and impact and loud aircraft noise is negatively affecting animals and even their once peaceful environments have deteriorated.</p>	<p>2200 HO</p> <p>NO-2</p> <p>NO-116</p> <p>DO-84</p> <p>NO-4</p> <p>NO-5</p> <p>NO-57</p> <p>NO-36</p> <p>NO-37</p> <p>BI-3</p> <p>BI-5</p> <p>BI-2</p>	
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Property values will be affected by the F-35 presence if it is placed in NM or in any of the other locations. Already, professional studies have been conducted relating to the effects noise from the F-35 will have on property values. This factor is minimized and played down in the EIS Holloman section. Reports show that declines in property values from F-35 activity will occur. If one location is affected, all will be affected due to the F-35 presence and negative impact, including associated noise levels. The AF and its contractor shouldn't attempt to ignore or minimize the damage that these 5 <sup>th</sup> Generation and other aircraft using flight space over populated areas of NM are having on the properties of the public.	SO-1	
The F-35 EIS states that sonic boom noise levels do not exceed 62 dB CDNL under any primary airspace unit. Yet sonic booms in affected NM areas are usually severely loud, explosion type sounds, other times sharp or heavy sounding, and dangerous in decibel levels often inflicting pain and discomfort, and other physical effects to many people and animals, even affecting structures. Many people in this area have been exposed to intrusive, violent, sonic booms, super booms, and focused booms in affected counties and communities in Southern NM for approximately four years since Holloman started sonic booming over populated areas first with T-38 aircraft in order to "familiarize people to sonic booms," according to media reports at the time from Holloman Public Affairs, followed by the F-22 aircraft and now others that use flight space over our communities. These reported decibel levels in the F-35 EIS are ridiculous and offensive to any person who has been exposed to multiplied hundreds and more than likely thousands of sonic booms over this four year period of time. The EA for the F-22 project was also very flawed and Holloman failed adhere to the amounts of sonic booms listed in the EA. Citizens' concerns have continued to be ignored. The innocent public, their properties and environment are the ones who suffer under these conditions. The F-35 EIS is also questionable and very flawed. People and environments in this area continue to be bombarded by sonic booms from Holloman aircraft often on a daily basis and many properties are also be being impacted negatively due to sonic booms and offensive noise.	GE-13	
This F-35 EIS conveniently fails to acknowledge already known information from what has already been experienced in NM area due to noise impacts from Holloman AFB aircraft that are using airspace over communities within our state. The decibel levels have been in the dangerous zones with negative effects experienced due to the extreme noise levels. Windows have broken, walls shaken, vehicles rocked and shaken, and humans and animals also have	NO-109 NO-8	
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	NO-1 NO-25	
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also been affected by F-22 noise pollution. Some animals have even died from sonic boom effects. The decibel levels have been above and beyond the 65 decibels considered compatible for residential use and also above and beyond what is acceptable for schools at the 75 decibel level or lower.	NO-12 EJ-2	
In the F-16 EA, for proposed Holloman project, it states that, "The FAA and DoD have identified residential use as incompatible with noise levels above 65 dB DNL unless special measures are taken to reduce interior noise levels for affected residences. Schools and childcare centers are considered compatible with noise levels up to 75dB DNL with additional noise attenuation. For noise levels above 75 dB DNL, educational services are not compatible regardless of noise attenuation." The EPA list 45 decibels or below for indoor noise level and 55 decibels or below for outside level noise as an acceptable to prevent hearing loss. Some research lists even lower levels as acceptable to prevent hearing loss.	GE-13	
Currently affected communities which would also be affected under the proposed action for the F-35 have not been protected. F-22 operations are allowed in "enhanced" airspace and have been responsible for dangerous noise levels over populated areas. Other Holloman aircraft also contribute to the noise levels and impact. Although, the FAA and DoD have identified what noise levels are compatible to sustain a certain quality of life levels, they are the same agencies that have allowed dangerous noise levels over populated areas in New Mexico, over many children, minorities, the poor, private properties, and furthermore, have ignored the public when we have questioned why the public is being subjected to dangerous noise levels and associated effects. Research, some mediocre in scope, cannot take the place of actual real world analysis. Agencies making statements about acceptable and unacceptable noise levels have not resided under the conditions that many Southern NM residents, animals, properties, and environments are residing under at this time. The F-22 was placed in this area with airspace enhancements in place over private and public lands where thousands of people, properties, and animals would potentially be affected adversely and the F-35 too would impact those same areas.	NO-28 NO-5 NO-81	
Many NM residents are once again at "guinea pig status" since whole environments and residents are being exposed often daily to what has not been done before under these conditions nor would be done anywhere else in this manner. Past NM history has shown that	GE-13	

<p>New Mexico residents have suffered greatly for various military projects that have taken in this area including radiation projects which endangered the great people of this state yet they have yet to be apologized to nor compensated. Once again, NM has questionable activities over land and residents.</p>	GE-13	2200 HO
<p><b>Sonic booms:</b> The F-35 EIS proposes sonic boom activity in the same flight space it is currently used by current Holloman aircraft which has already been discussed as including large areas over populated NM areas. The F-35 EIS now is calling it "Primary Airspace." F-35 EIS states that sonic booms will not be louder than 62dB DNL. Sonic boom noise is in the dangerous decibel levels. No researcher or agency who sits in an office and home far removed from communities which have been bombarded by sonic booms for almost four years in NM is in the position to tell the affected public that has been over-exposed to sonic booms, focused booms, and super booms magnified even greater than what a sonic boom sounds like, how they probably won't impact adversely in anyway since they are at 62dB DNL, or any other such comments.</p>	NO-109 NO-25	
<p>As per Major Richard M. Roberds, US Air Force, supersonic velocity maneuvers cause focused booms. He states that these focused booms are sonic booms magnified as high as five times under focusing conditions (Sonic Boom and the Supersonic Transport: Air Force University Review, July — August 1971.) The US Navy in it's EIS RE: Supersonic Operating Area at Fallon Nevada, recognizes that "focus" booms" may lead to startle-related accidents involving exposed individuals who are operating automobiles and other equipment. In addition there could be adverse effects on the autonomic nervous system, including changes in the vascular respiratory, endocrine and gastrointestinal systems, and the more likely possibility of annoyance, irritability, tension, nervousness, hearing impairments, sleep disturbances, and the inability to concentrate. These same statements made by the Navy in the Fallon Nevada EIS have been made by a physician who witnessed firsthand, a small community in the Nevada desert being harmed by sonic booms from Navy aircraft.</p>	NO-111	
<p>There is sufficient, current research on the sonic boom and sonic boom weapons, as well as the effects of noise pollution which should have had a part in this EIS with actual data regarding noise levels produced by sonic booms and the aircraft that Holloman is flying over populated areas. Equal to or greater than 65 or other such estimates are not sufficient when</p>	NO-108	
	DO-85	
13 of 20		

<p>there's potential for significant impact to the human environment. The Air Force knows the capabilities of their aircraft, yet this F-35 EIS and other public AF assessments for Holloman project have failed to list noise information that the AF is well aware of since these aircraft are well researched.</p>	DO-85	2200 HO
<p>Furthermore, there are thousands of people in New Mexico who have now been exposed to dangerous numbers of sonic booms, many who might not be in agreement with statements in this EIS which minimizes the effects that sonic booms and noise pollution can have on quality of life, properties, and even health. There is not a shortage of stories and experiences regarding the sonic boom situation in NM as a result of the sonic booming of the innocent public due to airspace enhancements over populated areas that are being used by 5<sup>th</sup> Generation Aircraft and others for supersonic activity and other training and testing. This has never been acceptable and wasn't acceptable even by the military, or FAA, but now many people in New Mexico, their properties, and animals, and environment are being exposed to this controversial sonic boom practice which should never have occurred while at the same time it's being reported that the FAA and DoD have established criteria for acceptable noise limits under 65db and 75db for various structures, even noise lower than that can have effects. No one, human or animal, should be exposed to repeated sonic booms. I question any EIS that would claim habituation to sonic booms over time occurs. The majority of those compiling information for a research project on noise or sonic booms have not been through any sonic booms. The F-35 pilot at the F-35 scoping meeting claimed he had never heard a sonic boom. Even sonic booms at higher flight levels have effects which are being ignored. These issues have been addressed by sonic boom researchers; yet I didn't see any of that information mentioned in this F-35 EIS.</p>	GE-13	
<p>Sonic booms are weapons of war and terror. They shouldn't have a place in airspace over our communities. Sonic booms were even unacceptable in the Middle East when Israel used sonic booms as a weapon in Gaza. Yet our AF is using this weapon of war over populated areas in NM. "We simply think that [the sonic booms are] a violation of basic human rights, especially rights of children to live in peace and to be educated in peace." Khaled Abdul Shafi (UN spokesman in Gaza).</p>	DO-82	
14 of 20		

2200 HO
<p>It's crucial that environmental studies for these projects be accurate and honest since thousands of people in NM have been exposed to great levels of sonic booms with accurate numbers not disclosed in the EA "FONSI" for the F-22 project. The amount of sonic booms listed as going to occur in a month period of time on the F-22 EA, regularly have been experienced in minutes instead of a month with other sonic booms throughout the month. This has been an injustice to humanity and every living thing. Various EA's for Holloman major projects, including this F-35 EIS being reviewed, have failed to provide the public with an accurate assessment of how dangerous loud jet noise levels, sonic booms, focused booms, and super booms can negatively impact health and the quality of life of those exposed to such noise pollution and the effects. Few resources were listed in this EIS document for the purpose of compiling information relating to the realities of dangerous noise effects. Sonic booms should have never been allowed to take place over populated areas in the first place. Contrary to the claims that "habituation" takes place in animals and people, based on my experience and knowledge, people and animals don't habituate to sonic booms or to excessive aircraft noise. Four years later, NM communities are still being severely impacted from Holloman AFB aircraft which are sonic booming in airspace over the public. Even "experts" who advise and provide consultation on the sonic boom state that the noise levels associated with the sonic boom is unacceptable and dangerous to the human ear and health. The F-16 EA states airport personnel will follow "hearing protection guidelines", what guidelines have been provided for the public to follow? Aircraft are conducting sonic booms over our cities, and counties, and people when those same aircraft aren't or won't be conducting supersonic training over the populated areas in other places. NM citizens will expect answers to these concerns that have been ignored for too long.</p>
GE-13
NO-2
NO-108
NO-113
GE-13
<p><b>Air Quality and Pollutants:</b> There has been a decline in air quality and increase in air pollution since the F-22 arrived to Holloman AFB, NM almost four years ago and since the AF and FAA increased the AF airspace over NM land allowing Holloman aircraft including the UAV's and all others to conduct military activities over large spaces and over private and public lands. Lack of visibility pollutants and many others are affecting NM air space, private and public lands residents, and properties. The environment has been and is being impacted by pollutants from Holloman aircraft and activities which find their way into the air, land, and</p>
GE-13
15 of 20

2200 HO
<p>water, and even inside private properties. The pollution in affected NM areas is severe many days due to the military activities in the area including aircraft flights. It is harmful to health and quality of life. The military in NM have always had sufficient airspace and land for training and testing without enhancements to increase flight space. The decline in quality of life and natural resource due to pollutants is obvious and in this area is due to the militarization of communities. Holloman AFB is listed among the major polluters of the state of NM and has been listed as a superfund site. The F-35 EIS fails to address the pollutant/pollution issue in an acceptable manner. Dated material is used for its pollution figures when current data should be available which should include data for all pollutants associated with Holloman AFB aircraft and actions which are polluting the NM environment and affecting NM residents and animals.</p>
GE-13
AQ-1 AQ-14 PN-6 SW-1
<p><b>Use of Defensive Countermeasures:</b> The EIS states where defensive countermeasures will be used in NM air space and what type of will be used. Among the areas that these countermeasures are stated to be used is in primary airspace which in many areas is that airspace over our counties and cities in NM and their populations, animals, and natural resources. The EIS states that students are going to expend defensive flares during their flights. This is unacceptable over our populated communities and NM lands. The EIS states that there is no plan to use chaff. Chaff and Flares have no place over the public and private and public properties. These pollutants have been found and even dumped in areas of our communities in large volumes. This would and could not be done in other cities and counties and concerned citizens will demand answers as to why it continues to be done in NM over NM residents, their properties, and our cherished lands.</p>
GE-13
SA-8 SW-4 DO-14 SA-25
<p>Military flare use has been evident in our skies, even recently in times of severe drought and extreme fire danger; although the F-35 EIS states that flares won't be used during extreme drought and fire danger. New Mexico has been under severe drought and has experienced many fires, some covering large areas, for some time now. The AF needs to protect our environment.</p>
DO-64 DO-16 SA-4
<p><b>Socioeconomic impact:</b> The socioeconomic impact analysis is also flawed. This issue has been evaluated thoroughly by other professionals who have taken part in evaluating the F-35 EIS. The EIS inflates the positive impact while ignoring and minimizing the negative impacts. It</p>
SO-13 SO-25
16 of 20

<p>is not a credible document since important factors are minimized, generalized, and even ignored.</p>	<p>SO-13 SO-25</p>	<p>2200 HO</p>
<p>Jobs are temporary that would be associated with this project. Most would be low paying construction type jobs. The numbers of potential jobs are questionable based on methods used to arrive at the figures. Companies and people from outside this area might be the ones that are employed not benefiting the local area. The EIS mentions that F-35 students would most likely arrive unaccompanied since their stay would be short. Most people in the community don't benefit from Holloman projects regardless of size. It is apparent that the local Alamogordo area is on a decline and it does not appear that Holloman AFB, NM projects have benefited the community as a whole. In recent years the F-22 arrived, the UAV's, and others yet the decline continues within area communities. A recent community meeting on planning for the areas future revealed that there is sufficient decline with less available for residents within the area than there was 10 and 20 years ago. I am familiar with NM and this area and the decline is evident. We know what was here that benefited community members and we see the situation now. Our community was in better shape decades ago and the air was cleaner without all the pollution being generated from Holloman aircraft. The whole community was cleaner and healthier.</p>	<p>SO-21</p>	
<p>The 2010 census showed a decline in number of residents within Otero County as compared to the 2000 census and a high number of vacant homes as well. Some Holloman projects are negatively affecting our communities and areas that are being exposed to military combat training over populated areas with sonic boom use are not benefiting the communities in any way. Quality of life has deteriorated for many residents and their properties, and the degradation from pollution both noise and environmental from AF activities is adversely affecting many areas. This should not be occurring.</p>	<p>GE-13</p>	
<p>Property values will suffer in NM communities from noise affects from the F-35 proposed project just as they will in other areas being considered. The dangerous noise levels from sonic booms and the negative and potentially dangerous effects from those sonic booms in the NM area are played down presently and are being minimized in the F-35 EIS. More attention is being paid to over flight noise in other communities being considered in some areas of the F-35 EIS.</p>	<p>GE-13</p>	
	<p>NO-36 AQ-1</p>	
	<p>SO-1</p>	
	<p>NO-11</p>	
<p>17 of 20</p>		

<p>Already, various communities in NM are experiencing the effects from noise pollution and if the F-35 proposed project is located to NM the number of communities and related properties would increase with those properties being impacted by decreased property values due to the military actions taking place in NM communities. There are figures that are projecting considerable effects on property values which are unacceptable. Citizens in NM and all other areas being considered should not have their properties devalued due to military actions that will have negative affects. The military has been sued previously by property owners who had properties affected by what the military was doing in there communities. What is taking place or that is proposed to take place and associated effects should not be ignored. People invest in their homes and military projects should devalue them.</p>	<p>SO-1</p>	<p>2200 HO</p>
<p>The EIS states that Holloman will be building more homes for their members. Military personnel who live on base won't be purchasing homes in local communities.</p>	<p>GE-13</p>	
<p>The noise issue will impact socioeconomic factors. NM areas are promoted for tourism and are also promoted as a retirement option, yet what is being allowed involving military projects and proposed project such as the F-35 will negatively impact tourism and add to further decline in many communities.</p>	<p>GE-14</p>	
	<p>GE-13</p>	
	<p>SO-7</p>	
<p><b>Environmental Justice Section:</b> The EIS concludes that, "there is the potential for disproportionately high and adverse impact to minority and low- income populations in affected NM communities. Minority and low income individuals are already being significantly impacted by what is currently taking place in communities where there are dangerous noise levels and exposure to pollutants generated by Holloman AFB, NM aircraft presence that is also affecting air quality. Those numbers will increase since more counties will be affected. Most of the individuals in such groups are at a disadvantage as they have limited resources. Concerned citizens will advocate for those who can't speak for themselves.</p>	<p>EJ-4</p>	
<p><b>Affected Environment — Schools and Children:</b> Many New Mexico children, including poor and minority children, are currently being affected by the militarization taking place in area civilian communities due to training and testing from Holloman AFB, NM over populated NM communities where the AF increased their ranges for military activities. Children of all ages, even the unborn are being exposed to dangerous noise levels while at school, home, and</p>	<p>GE-13</p>	
<p>18 of 20</p>		

2200 HO

elsewhere even in their mother's womb. The F-35 proposed project will make many communities uninhabitable. Children are also being exposed to many pollutants and reside under air space in which aircraft could potentially crash. Holloman AFB, NM children are not being affected by dangerous decibel levels from the aircraft noise, sonic booms, and focused booms as are the children in other neither NM communities nor will they be impacted like children in many NM communities and Texas communities will be if the F-35 is based in this area. These dangerous noise levels will affect the health, safety, and welfare of many NM children. NM children don't need to be further negatively impacted due to noise from the militarization of their communities. Noise affects learning, cognitive abilities, and appropriate development, and can have other harmful effects to a child. NM children don't need setbacks in their life due to exposure to dangerous noise levels, nor does any child in any state of this country.

I am well aware of what NM children are experiencing even now due to noise pollution and sonic booms and other effect from aircraft flight over whole communities. There are children that have fears, nightmares of sonic booms, children who cry because of the aircraft noise and sonic booms. Children have been thrown down because of the severe impact from sonic booms, super booms, some hide under playground equipment, and others hide under their desk. This should not be happening in our community or our country. There are reports of pain including ear pain, bleeding from nostrils, headaches, and other effects including to hearing. This is injustice. NM children already face many disadvantages and they don't need to be negatively impacted from Holloman projects or any military projects that shouldn't be taking place in their communities or environments being affected while in their homes and at school.

**Biological and Cultural Resources:** These resources need to be protected and is the reason why there should be limits to the acreage that is taken by the military for its training and testing. There is complete disregard for New Mexico's biological and cultural resources in this AF plan that will negatively impact at least 12 New Mexico Counties as well as some in Texas. The AF and this type of project don't belong over our resources. We love our State and our communities and don't want the military to degrade further what belongs to the citizens of NM. The F-35 is not welcome here where it will negatively impact our precious resources.

19 of 20

LU-6  
EJ-2  
GE-13  
EJ-2  
BI-2  
CU-12  
GE-1

2200 HO

**Conclusion:** The F-35 aircraft doesn't belong in our NM communities where it will cause negative impact. There is no mitigation for such a project. Holloman leadership has ignored valid citizen concerns and inquiries for years now regarding impacts to communities and the citizens. The injustice has been significant. The proposed F-35 project and impacts to our communities and citizens would most likely be treated in the same manner. It appears that this aircraft was tested in NM at Holloman AFB, NM recently, and no community should have to be impacted by such an aircraft. It should not have been tested in this area without proper public disclosure. Its noise is dangerous and no one needs to be deafened or harmed by its impact to persons and communities. The sonic booms associated with this aircraft will endanger the life of people and animals, and properties will be negatively impacted. Such a project will not add to our community, but will degrade the area. There will have to be accountability if the F-35 is located to any community where it will add to the adverse impacts already taking place and where it will further degrade the environment and the quality of life of the people and animals.

Sincerely,

Voice for Integrity  
Mrs. Schuster, Director

20 of 20

GE-4  
NP-33  
GE-13  
NP-2  
DO-86

2201 HO

March 6, 2012

Representative Steve Pearce  
200 East Broadway  
Hobbs, NM 88240

Re: F-35A Training Basing Environmental Impact Statement (EIS)

Dear Mr. Pearce:

Enclosed is the bound packet that was sent to David Martin, Air Force Contractor. Mr. Martin has been contracted to develop the Draft and Final EIS for the F-35A Training Basing.

This packet was sent to you because the residents of the Weed, Mayhill, Sacramento and Piñon NM communities have serious concerns about the Draft EIS as a reliable and valid document. These concerns are found in representative letters in this packet and are copies of some of those mailed to Mr. Martin.

Two reasons prompted us to send you this document.

- First: We understand the purpose of scoping process is to
  1. identify significant issues to be analyzed in the EIS
  2. identify any related EAs or EISs
  3. identify gaps in data and informational needs

After careful and arduous study of the Draft EIS by various members of our communities, it was discovered that the Draft EIS does not address these issues as they relate concerns regarding the F-35A in general or of the Sacramento Mountain communities of Weed, Mayhill, Sacramento and Pinon, NM, in particular. These mountain communities are located directly under Military Training Routes that will be used by the F-35A.

DO-25

Second: During the scoping period, many of our community members presented their concerns at a Public Hearing that was held in Weed on March 23, 2010. This meeting was arranged through our County Commissioner. Representatives from various legislators officers were invited to attend. We were told our comments presented at this meeting would be considered in the Draft EIS.

NP-3

In addition, many members of our communities spent hours developing and sending questions to Mr. Martin during the scoping period. The questions concerned environmental impacts the F-35A would have on our communities. In the Draft EIS regarding Holloman AFB, only Alamogordo and Holloman were assessed. Our concerns have been ignored and are addressed in the Draft EIS.

2201 HO

We want to make you aware of these facts as the Draft EIS for the F-35A moves through the NEPA process.

If you or any of your staff have studied the Draft EIS, it will be found that this document is seriously flawed in many ways.

Of special concern is the fact that the results of such a poorly designed Environmental Impact Statement will be the basis for decisions made by the Air Force that will significantly and negatively impact our health, safety, welfare, and local economy.

NP-13  
DO-2

We appreciate your consideration of our concerns, and look forward to your comments regarding these issues.

Sincerely,

*Tom Ward*  
Tom Ward, President  
Weed Community Association

2201 HO

March 6, 2012

Honorable Jeff Bingaman  
U. S. Senate  
119 East Marcy, Suite 101  
Santa Fe. NM 87501

Re: F-35A Training Basing Environmental Impact Statement (EIS)

Dear Senator Bingaman:

Enclosed is the bound packet that was sent to David Martin, Air Force Contractor. Mr. Martin has been contracted to develop the Draft and Final EIS for the F-35A Training Basing.

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We appreciate your consideration of our concerns, and look forward to your comments regarding these issues.

Sincerely,



Tom Ward, President  
Weed Community Association

2201 HO

March 6, 2012

Honorable Tom Udall  
U. S. Senate  
102 South Federal Place  
Santa Fe, NM 87501

Re: F-35A Training Basing Environmental Impact Statement (EIS)

Dear Senator Udall:

Enclosed is the bound packet that was sent to David Martin, Air Force Contractor. Mr. Martin has been contracted to develop the Draft and Final EIS for the F-35A Training Basing.

This packet was sent to you because the residents of the Weed, Mayhill, Sacramento and Piñon NM communities have serious concerns about the Draft EIS as a reliable and valid document. These concerns are found in representative letters in this packet and are copies of some of those mailed to Mr. Martin.

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2201 HO

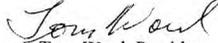
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We appreciate your consideration of our concerns, and look forward to your comments regarding these issues.

Sincerely,

  
Tom Ward, President  
Weed Community Association

From: 03/14/2012 13:27 #162 P.001/002  
**2202 LU**

\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS.

**United States Air Force**  
**Public Hearing Comment Form**  
**F-35A Training Basing**  
**Environmental Impact Statement (EIS)**

Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways:

- 1) Turn in this form at the comment table before you leave tonight.
- 2) Provide oral comments to the court reporter during the open house session or public hearing.
- 2) Mail, fax or email comments to:

David Martin, Air Force Contractor, and Kim Fomof  
 HQ AETC/A7CPP  
 266 F Street West, Bldg. 901  
 Randolph AFB, TX 78150-4319  
 Fax: 210-652-5649  
 Email: [aetc.a7cp.inbox@us.af.mil](mailto:aetc.a7cp.inbox@us.af.mil)

All comments on the Draft EIS must be postmarked or received by March 14, 2012, to ensure they become part of the official record. All comments will be addressed in the Final EIS.

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

**Name:** Niels Roberts  
**Organization/Affiliation:** Roberts Resorts, LLC / Owner  
**Address:\*** 1120 N El Mirage Road  
**City, State, Zip Code:** El Mirage AZ 85335

**Comments:**

The F-35 poses a threat to the health and wellbeing to the residents and staff of Roberts Resorts' El Mirage residential community.

Pueblo El Mirage Golf and RV Resort and its principles recognize that military airfields are a vital component in the Defense strategy for the US. We also recognize that Luke Air Force Base plays a major role in El Mirage's local community and regional economy. To date, Luke Air Force Base has not engaged in activity that is detrimental to El Mirage residents' well being, and it is our belief that to continue operating in this regard requires a full evaluation of the negative health repercussions inherent in the high decibel output of F-35 flight operations.

To this end, it is imperative that as part of the decision-making process, the Air Force demonstrate to its neighbors at El Mirage the actual on-ground decibel output by conducting live-flights of the F-35 here instead of relying on strictly computer-simulated sound models.

NO-7

From: 03/14/2012 13:27 #162 P.002/002  
**2202 LU**

These flights will provide actual noise output figures as well as a true experience for our residents of the resulting discomfort and disturbance potential.

NO-7  
 cont'd

People living within a 5 mile range of the F-35 base runway will be at risk of suffering from noise-induced health problems<sup>1</sup> (loss of hearing, speech, Hypertension, various psychological difficulties...). Approximately 3,024 residents and 60 staff members of Pueblo El Mirage will be repeatedly exposed to the high decibel noise output of F-35 flight. In May 2009 it was determined by an audio professional at Eglin AFB that the F-35 created noise levels of 105-106 dB, 3 times as loud as an F-16.<sup>1</sup> In addition to causing irreversible health problems, the F-35 operations are likely to devastate local real estate prices and drive Pueblo El Mirage RV and Golf and other merchants out of business.<sup>2</sup>

NO-6  
 NO-1  
 SO-18  
 SO-1

We understand the importance of Luke Air force Base in El Mirage, and we are supportive of its ongoing role. Unfortunately, the harmful noise level negates the local economic benefits of the F-35. We are confident that the US Air force will give strong consideration to the health risks the F-35 aircraft's noise on the US citizens of El Mirage, AZ.

SO-13

<sup>1</sup> Link to charts comparing decibel levels and OSHA Daily permissible exposure time.  
<http://www.gcaudio.com/resources/howtos/loudness.html>

NO-44

<sup>2</sup> Link to article detailing F-35 decibel level <http://www.nwfdailynews.com/news/webb-17331-noise-valparaiso.html#ixzz1oseUQhTg>. And link to video documenting noise differential between the F-16 and F35 aircraft.  
 (<http://www.youtube.com/watch?v=Jnm1d3iG1x4>)

NO-1

<sup>3</sup> Link to video stating the effects the F-35 will have on real estate values  
<http://www.youtube.com/watch?feature=endscreen&NR=1&v=yELTsRxU9dY>

SO-18

\*\*\*Please print -- Additional space is provided on the back.\*\*\*

Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.

**Final**  
**June 2012**

03/14/2012 WED 8:45 FAX 520 545 2121 supt./governing board

001/002

2203 TU



Governing Board Office
2238 East Ginter Road
Tucson, Arizona 85706
Phone (520) 545-2022
Fax (520) 545-2121

DATE: 3-14-12
TO: David Martin Air Force Contractor
HQ AETC/A7C-P
266 F Street West Bld 901
FAX NO: Randolph AFB TX 78150-4319
FROM: Margie Jones, Administrative Assistant

Number of Pages Including Cover Sheet: 2
COMMENTS: (210) 652-5649

This message is privileged and confidential, intended only for the addressee.

If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

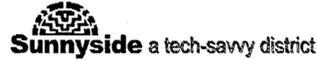
If you have received this communication in error, please notify this office at 545-2022, and destroy the fax received. Thank you.

Please call Margie Jones, Administrative Assistant to the Governing Board, if complete transmission is not received.

03/14/2012 WED 8:46 FAX 520 545 2121 supt./governing board

002/002

2203 TU



2238 E. Ginter Road
Tucson, Arizona 85706
Telephone (520) 545-2022
Fax (520) 545-2121

March 13, 2012

The Sunnyside Unified School District Governing Board would like to express our concerns and be part of the record of comments regarding the Draft Environmental Impact Statement for the proposed basing of an F-35A Lightning II Pilot Training Center at Tucson International Airport.

We are opposed to the Air Force stationing these planes at Tucson International Airport. It is a fact that noise levels greater than 65 dB DNL have adverse effects on children and adults but especially children. As Governing Board members, we have a duty to provide Sunnyside District students with the best learning environment possible. The 65 dB DNL that is in the reports is a 24-hour average sound level. The peak sound level when the jets are actually flying over is much higher. We have seen the effect this level of sound has on our students and the frustrating interruption of their education every time a teacher has to stop the lesson and wait until students can hear the instruction.

In addition to being responsible for education in Sunnyside District schools, we are advocates for our community as well. In studies on Community Noise, the World Health Organization compiled the results of more than 900 separate studies of the effects of noise upon humans. The studies found that students affected by aircraft noise have a greater difficulty learning to read and process information. The Department of Defense's Operational Noise Manual lists additional problems that students suffer from when exposed to noise in the classroom, and it lists the types of students who are most susceptible to the impacts of noise. Children are different than adults and have poorer understanding in noise and lower performance in reverberation. Those students most affected include:

- The youngest,
Those with English as a second language,
Any child suffering from a hearing deficiency (including short-term hearing loss from middle ear infections),
Children starting with below average academic skills and
Children with Attention Deficit Disorder (ADD).

http://www.who.int/docstore/peh/noise/Comnoise3.htm
http://www.slhs.umn.edu/assets/pdf/NelsonMCworkshophandout.pdf

Twenty-four-hour DNL averaging is not appropriate for determining the noise impacts on schools and other facilities that are occupied only for part of each day. Recognizing this, the Operational Noise Manual states that "contour maps of DNL, by themselves, cannot be used to determine whether a particular classroom is suitable for learning." The Manual notes that "For school children, the American National Standards Institute (ANSI) has recommended a [...] limit of 35 dBA." http://www.stoptheplanes.com/DoDNoiseManualFinalREV.pdf

The Governing Board of the Sunnyside Unified School District, which lies entirely within the flight pattern of the F-35A, opposes the basing of the F-35A at Tucson International Airport because of the impact of noise levels and the diminished quality of life this aircraft will have on our students, families and community members.

Magdalena Barajas, President

Buck Crouch, Clerk

Eva Carrillo Dong

Louie Gonzales

Daniel Hernandez, Jr.

NO-50
EJ-2
NO-99
GE-4

Final
June 2012

03/13/2012 20:09 FAX 5208830054

RAMIREZ

2204 BO

fax

**Subject:** PUBLIC HEARING COMMENT FORM  
 Joint Strike Fighter Tucson Arizona

**Date:** March 13, 2012

**Pages:** 3

**To:** David Martin Air Force Contractor / Kim Fornof  
**Fax:** 210-652-5649

**From:** B D Ramirez  
**Fax:** 520-883-0054

**Comments:** Attached is a 2 page Public Hearing Comment Form I would like added for consideration.

03/13/12 12:08PM THE UPS STORE 2083452054

2204 BO

**United States Air Force  
 Public Hearing Comment Form  
 F-35A Training Basing  
 Environmental Impact Statement (EIS)**



Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways.

- 1) Turn in this form at the comment table before you leave tonight.
- 2) Provide oral comments to the court reporter during the open house session or public hearing.
- 2) Mail, fax or email comments to:

David Martin, Air Force Contractor, and Kim Fornof  
 HQ AETC/A7CPP  
 266 F Street West, Bldg. 901  
 Randolph AFB, TX 78150-4319  
 Fax: 210-652-5649  
 Email: [a7cp.inbox@us.af.mil](mailto:a7cp.inbox@us.af.mil)

All comments on the Draft EIS must be postmarked or received by March 14, 2012, to ensure they become part of the official record. All comments will be addressed in the Final EIS.

Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

**Name:** Gwain Gould and Edna Pukash  
**Organization/Affiliation:** Sunrise Rim Neighborhood Assn.  
**Address:** 2400 Sunrise Rim Rd  
**City, State, Zip Code:** Boise, Idaho 83705

**Comments:** We love our military; however this request for F35A fighter jets at Gowen Field brings into question the WAF's love for Boise's citizens. With a perfectly wonderful Air Force base less than 50 miles east of Boise, why would this horrendous impact on our city, our schools, our parks and our quality of life and our property values even be a consideration? Considering the number of hotels, restaurants and business offices close by, as well as Simplot Sports Complex, churches and schools which would be impacted, we feel

GE-1  
 GE-12  
 EJ-2  
 EJ-6  
 NO-18  
 NO-36  
 SO-1  
 SO-18  
 EJ-2

\*\*\*Please print - Additional space is provided on the back\*\*\*  
 Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.

\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS

**Final**  
**June 2012**

03/13/12 12:08PM THE UPS STORE 0130 200342022

2204 BO

A DECISION TO APPROVE F35A FIGHTER JETS AT BOWEN FIELD IS LUDICROUS - AND UNTHINKABLE "NOT SUITABLE FOR RESIDENTIAL USE" TERMINOLOGY SAYS IT ALL.

GE-4

WE LIVE HERE NOW ALONG WITH OVER 1000+ ADDITIONAL RESIDENTS WHOSE QUALITY OF LIFE AND ECONOMIC SURVIVAL WOULD BE IMPACTED BEYOND REPAIR.

LU-6

NO-11

NO-36

SO-18

PLEASE DO NOT APPROVE THIS REQUEST!

GE-4

*Thank you  
Elizabeth Upham*

2205 TU

Elizabeth Anne Upham

Attorney at Law  
P.O. Box 591  
Tucson, Arizona 85702

Elizabeth Anne Upham

(520) 624-8060  
Fax (520) 622-1094  
elizabethupham@msn.com

Davis Martin, A F Contractor, & Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, Tx 78150-4319

FAX to: (210) 652-5649

re: Opposition to F35s in Tucson

Dear Contractors.

I have lived in Tucson since I was five years old. That's long enough to remember when two different Air Force planes crashed in the city causing loss of civilian lives. The most recent mishap narrowly missed an elementary school and the University of Arizona.

SA-1  
SA-2

Tucson has grown since then and the population cannot afford to risk injury to more innocent people.

Besides the potential harm because of a crash I am concerned that the F35 is far louder than the planes currently housed at DMAFB. I live in an area where I can hear the I-10 freeway, surface street traffic, police helicopters, rescue helicopters as well as planes from the base and the Tucson airport. Science tells us that noise pollution is not only a nuisance but a health hazard. We Tucsonans treasure our mild weather and enjoy being outdoors every month of the year. F35s will bother our ability to recreate. Please review the recent AARP magazine questioning the need for the F35.

NO-1  
NO-8  
NO-6  
NO-18

There are no positive aspects to housing the F35 in Tucson. I urge the Air Force to use some common sense and protect us from this abominable plan.

GE-4

Sincerely yours,

*Elizabeth Anne Upham*  
Elizabeth Anne Upham

United States Air Force  
Public Hearing Comment Form  
F-35A Training Basing  
Environmental Impact Statement (EIS)



2206 TU

Please use this sheet to provide your comments on the Draft EIS. If your comment refers to a specific page or section of the EIS, please identify that location. You may submit your comments in any of the following ways:

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Fax: 210-652-5649  
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Public comments are requested pursuant to the National Environmental Policy Act, 42 United States Code 4321, et seq. All written comments received during the comment period will be considered during Final EIS preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Final EIS or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Final EIS distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name: Sheila Hawkins  
Organization/Affiliation: STAR POST  
Address: 1002 S. PANAMA ROAD  
City, State, Zip Code: TUCSON, AZ 85710

Comments: The F-35A's must  
come to TUCSON. WE  
ARE THE ~~BEST~~ VERY  
CLOSE TO THE HOLDWATER  
RANGE, WHICH WOULD  
SAVE fuel. WE  
HAVE many old people  
who can only hear  
themselves talk and  
we have the perfect  
airport for them too.  
In regard to old people

GE-3

FROM : S STAR TERMITE AND PEST CONTROL FAX NO. : 5208861788

Mar. 12 2012 09:14PM F 2

2206 TU

here, if they complain  
about the noise -  
don't WORRY, they  
really can't hear  
anyway.  
please come to  
TUCSON. We need more  
pilots and planes  
here.

GE-3  
cont'd

Final  
June 2012

Visit [www.F-35ATrainingEIS.com](http://www.F-35ATrainingEIS.com) for project information or to download a copy of the Draft EIS.  
\*Provide your mailing address to receive future notices about the F-35A Training Basing EIS.

2207 BO

March 13, 2012

David Martin, Air Force Contractor, and Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX 78150-4319  
Fax: 210-652-5649  
Email: aetca7cp.inbox@us.af.m.

Dear U.S. Air Force and IDANG,

Here are comments of Western Watersheds Project on the potential use and basing of the F-35A and its training activities across an extensive area of public lands in the fragile sagebrush biome. The DEIS is the United States Air Force F-35A Training Basing Environmental Impact Statement.

WWP opposes any use of the F-35 in Idaho. We are strongly opposed to basing 72 F-35A aircraft in Boise or Mountain Home. We strongly support the No Action Alternative. The Alternatives presented do not adequately examine the full spectrum of adverse impacts to the public. The Environmental consequences of the needed construction, personnel changes, and flight operations at the main airfield, auxiliary airfields, military ranges, and in the military airspace are not adequately described and analyzed in the EIS. We are greatly concerned about impacts of overflights and use of the military ranges.

This plane is twice as loud as F-15s and F-16s on takeoff and landing. These planes would take off and land 50 times per day, for a total of 14,000 times per year. The unsuitable lands for human habitation stretch from Maple Grove to Columbia Village. 4 schools, 13 day cares, and two parks are located there. They would use afterburners 1400 times – and fly at night disrupting sleep 1400 times per year, as well.

These planes would fly right by or over the Snake River Birds of Prey NCA which is located very close to Gowan Field. Then they would fly over, and maneuver over – public lands – BLM lands and potentially Forest Service lands as well. We are greatly concerned about adverse impacts to public lands, wildlife and recreational associated with the Juniper Butte and Saylor Creek and other military training ranges – including all components of the training activity.

It is not just the noise that is of great concern. Air pollution, in a valley already suffering from severe air quality problems, would also increase substantially. These planes and their contrails will increase dull gray skies that hold heat in, increase pollutants, and likely increase inversion effects and pollutants trapped in the stagnant valley airshed. This would all be occurring at the same time as Oil and Gas development is projected to unfold in western parts of the airshed. All of this combined, along with the very large quantities of methane and other air pollution being emitted by CAFOs like industrial dairies and beef feed lots that have flooded into Idaho due to lax environmental regulations would be increasing pollutant loads over the whole valley, as well.

How will all of this pollution combined affect human health? The health of pets? The health of wildlife? How will it exacerbate the adverse impacts of climate change effects? Won't skies laced with contrails that end up forming clouds hold in heat – and amplify warming effects?

GE-4  
GE-19  
NP-13  
NO-1  
LU-6  
EJ-2  
EJ-6  
NO-3  
AQ-1  
BI-5  
NO-18  
AQ-1  
AQ-11  
GE-13  
AQ-14

2207 BO

This aircraft is horrendously loud. The F-35 will destroy the quality of life for Idaho residents in their homes in Boise and other areas overflow/exposed to this roar, as well as across public lands over which it would fly. Its use in wild lands of southern Idaho and the West will adversely affect a wide range of rare, imperiled and sensitive wildlife species that WWP has worked very hard to conserve and protect. These imperiled species include bighorn sheep, sage-grouse, migratory birds, and other native wildlife. Ground-based training support activities will degrade, alter and adversely impact slickspot peppergrass habitats, as well. More use on road in remote ranges will promote more weeds. These concerns are amplified by the significant public lands livestock grazing degradation that occurs across lands surrounding remote range sites.

Wildlife across the sagebrush biome already face great threats and stresses in their environment. See Knick et al. (2003), Connelly et al. (2004) Conservation Assessment for Greater Sage-grouse, Kick and Connelly (2009) Sage-grouse Monograph Studies in Avian Biology, U.S. Fish and Wildlife Service March 2010, Warranted But Precluded Finding for greater sage-grouse. It is increasingly known that sage-grouse and other wildlife are very sensitive to disturbances. Sage-grouse and other wildlife in southern Idaho suffer significant habitat degradation and disturbance from livestock grazing - including degradation of all components of habitats – soils, vegetation, cover, space, and food availability. See USDI BLM Jarbidge AMS (2007).

The present military overflight noise, sonic booms, use of flares and chaff by F-16s and F-15s and other aircraft in the southern Idaho deserts, northern Nevada and eastern Oregon under the MOAs and MTRs is already greatly excessive. It is hard to even imagine what the sonic and visual Hell that would result from F-35s being added to the mix would be like.

Recent military training exercises this winter over Boise caused significant discomfort and stress to local residents, disrupted work for people who have home offices, disrupted outdoor walks and hikes, and otherwise greatly lowered the quality of life. In summer, sleep would have been impossible – and these were quieter planes! If these horribly loud F-35s are used anywhere near towns, residents will suffer great stress –and the public will suffer increased costs at all levels – including such things as air conditioning bills that skyrocket. People will not even be able to leave their windows open for fresh air, or to take advantage of natural cooling at night.

When WWP members complained about the recent overflights, there was no response at all from the Air Force – other than justifying its dangerous training activity over a populated center. The loud and disruptive overflights just continued. Information requested by members from the Air Force, after calling to complain, on environmental analysis for training over a densely populated city - have not been provided. The military in the Boise-Mountain Home area is not even able to address public concerns at present. The Mayor's office, despite news articles implicating the Mayor in involvement in this, is denying any knowledge. We are greatly concerned that policies aimed at placating military contractors seeking lucrative federal contracts and others are trumping concern for the health and well-being of area residents. We found it particularly ironic that the city of Boise's Website proclaims Boise is the most livable city – at the same time that the Mayor's Office was evading responding to a flood of citizen complaints about the overflight noise.

On many occasions while hiking, camping, birdwatching, engaging in photographic pursuits, and seeking solace, solitude and enjoyment in wild land areas - the current ear-splitting noise from overflights has marred and disrupted our members use and enjoyment of the public lands. For example, It has forced us to cover my ears, and drive away from sites where we have been trying

NO-1  
NO-16  
NO-36  
BI-6  
BI-24  
BI-8  
NO-8  
NO-1  
BI-5  
NO-18  
SO-18  
NO-36  
NO-3  
SO-45  
DO-63  
PN-1  
GE-13  
NO-18

2207 BO

to enjoy a hike or nature observation. A dull ache persists for hours in one's ears after exposure to the current excessive noise coming from military activity associated with the USAF and IDANG. NO-18  
cont'd

Loud planes suddenly appearing can also produce a "startle" effect that shocks a person's senses, and elicit a fear response. Animals, too, may exhibit a fear response as well to objects suddenly appearing on the horizon. BI-5

Exposure to deafening and noises, startling objects suddenly appearing in the visual field, and skies laced with contrails that create murky white cloudy skies on a clear day are the antithesis of wild land recreational use and enjoyment in the WSAs, Wilderness, unroaded wild lands, remote sagebrush plateaus, of the tri-state region. NO-1  
BI-5  
AQ-1

Native wildlife species subjected to incessant noise face stress, disruption of social behaviors, and likely displacement from important nesting, breeding, brood rearing, kidding, fawning, birthing, summering, wintering and other habitats. Wildlife will suffer increased mortality from being displaced into sub-optimal habitats, or made more subject to predation. These adverse impacts will lead to further losses and declines of species like sage-grouse, over which there is great public concern. BI-6  
BI-8

A full and comprehensive baseline analysis of the condition of habitats and populations of all BLM and Forest Service special status species impacted by the potential F-35 overflights in this tri-state region must be provided. How will this horrendously loud aircraft increase stress, and cause population declines in sage-grouse? What is the current status of al sage-grouse habitats and populations over which this horrifically loud aircraft would fly? Where are all important lek, nesting, brood rearing, and wintering habitats? How will the F-35, on top of all the ongoing noise activity, adversely impact habitats and populations? What is the current baseline of ecological degradation that exists across these sage-grouse habitats – such as degradation from livestock grazing, sage-grouse mortality due to livestock facilities like fences or troughs that promote West Nile virus, and the combined adverse effects of livestock grazing and wildfire, roading, and other disturbances to the public lands? BI-23  
BI-8

Please see Attached WWP comments on the Jarbidge BLM DEIS/DRMP, illustrating the current ecological conditions and plight of wildlife, and wild lands – including the degree and severity of degradation from livestock grazing and synergistically related fires. See also Attached USD I BLM Jarbidge Analysis of the Management Situation (AMS) describing serious habitat ecological concerns and stresses –from weeds, wildlife, livestock facilities like fences, road densities, etc. that sage-grouse, bighorn sheep, antelope, Brewer's sparrow, loggerhead shrike, sage thrasher, and other rare and important species already face. GE-26

Where all active, historic, undetermined leks that will be subject to this noise? What are the current numbers of birds at these leks, and how have these numbers changed over time? What is the current human disturbance Footprint on lands to be overflowed? BI-13  
BI-14

A full and comprehensive analysis of the adverse impacts of military training activity, including on animals and humans, must be provided. BI-23

2207 BO

The Air Force Environmental Review is greatly inadequate in its examination of all direct, indirect and cumulative adverse environmental impacts related to this plane and its operations and operational Footprint. NP-13

It is critical to understand the full sonic, visual, air pollution, and ground-based other disturbance associated with ongoing or other foreseeable military activities in this region. CM-6

Habitats of California bighorn sheep, sage-grouse, migratory birds and other wildlife that inhabit lands under military airspace in southern Idaho are already greatly stressed BI-3

Please see Attached WWP comments on the White Elk airspace expansion. Please apply all concerns related to noise, air pollution, visual pollution and startle effects, disruption of recreation and wildlife habitats, etc. in those comments to this current F-35 process. GE-26

We have heard from members in the North End whose dogs are startled just by the planes taking off at the Boise airport. It is hard to imagine the stress that F-35s would place across the entire town. We believe the estimates of the noise impact zone is far too limited in the analysis. BI-5  
NO-11

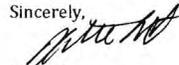
Plus, if domestic dogs that are typically exposed to many loud noises in town are spooked by airplane noise, the effects on wildlife in wild land settings, many species of which have far keener hearing, and are sensitive to a larger or different frequency range than humans, will be immense. BI-5

We are also greatly concerned that this activity will increase the abominable use of white phosphorus, which the military slipped into practice at Saylor Creek under a flimsy EA. The claims in that EA were unsubstantiated. Use of this substance is hazardous to humans, as well as increasing risks of uncontrolled wildfire. A full range of alternatives must be considered here, including activities that reduce the number of flights from ALL military aircraft significantly, and roll back use of remote sites as well as harmful substances like white phosphorus. DO-39

Please keep us fully informed of all parts of this analysis.

This plane's activities just in Boise would be expected to result in sleep disruption (projected to increase by 33%) and hearing loss for 313 residents. This shows what an abomination this F-35 is, and it simply should not be produced, and should not be flown anywhere. NO-3  
NO-5

It is time for a current, integrated, honest baseline analysis of all military training activities – by both the U. S. and foreign parties, across this region. The piecemeal stack of existing analyses (and proposals in the wings) covering USAF, foreign entity – like Singapore or Saudi Arabia, and IDANG training activities - is greatly inadequate. Full and detailed analysis of all airspaces, training areas, military and other uses, noises, visual disruptions, air pollutants, wildlife habitat disruptions, impacts to wildlife habitats and populations, impacts to recreational uses - all must be fully provided. CM-6

Sincerely,  
  
 Katie Fite  
 Western Watersheds Project

2207 BO

PO Box 2863  
Boise, ID 83701  
208-429-1679

CD INCLUDED  
WHITE ELK COMMENTS  
JARBIODGEAMS (USDI BLM)  
JARBIODGE RMP COMMENT  
IDANG WHITE PHOSPHORUS COMMENTS  
CONNELLY ET AL 2004 CONSERVATION ASSESSMENT  
MARCH 2010 USFW SAGE GROUSE  
BUCKLEY ABSTRACT  
AFS IN SINGAPORE CONCERNS

CD files were corrupted. Only three attachments on the CD were accessible and are provided below in their entirety.

2207 BO



Boise, Idaho Office  
PO Box 2863  
Boise, ID 83701  
Tel: (208) 429-1679  
Fax: (208) 342-8286  
Email: [Katie@WesternWatersheds.org](mailto:Katie@WesternWatersheds.org)  
web site: [www.WesternWatersheds.org](http://www.WesternWatersheds.org)

Working to protect and restore Western Watersheds

January 23, 2007

Mr. Ken Walker  
HQ ACC/A7ZP  
129 Andrews Street, Suite 102  
Langley AFB, VA 23665-2729

RE: Republic of Singapore Air Force F-15 SG Beddown EA

Here is additional information and uncertainty that we have encountered in further review of the Singapore Bed-down EA.

There is no real discussion of how the various training and flight requirements of these new airplanes and the technology including real or mock weaponry that they employ, or other bed-downs or training activities that may occur. Please provide a detailed accounting of foreseeable additional adjustments in flight patterns, noise levels, startle effect, flights over populated areas, WSAs, ACECs sage grouse leks, bighorn sheep habitats, or other important and special areas. For example, if these are a new model of plane, they must have new or different effects – ranging from sound frequencies during flight and maneuvers to exhaust pollutants to use of lasers, flares, or other devices..

We hope the Air Force is aware that there is a tremendous amount of new housing development, growth and other activity that is likely to occur in southern Idaho in the areas affected by this activity. The maps in the EA are curiously deficient in showing just where and how much of the flight activity – especially that of aircraft returning from the long swoop to the North. How might this affect current, or future residents?

How might this activity affect the burgeoning kayaking, hiking, and wildlife-associated outdoor recreation activities in southern Idaho – how much property value will be lost to private land owners who are overflowed – either under the 10 plane scenario or very foreseeable expansions. The areas to be overflowed are certain to undergo further land development - and conflicts will increase greatly during the 5 to 10 years of this action.

How might this action lower land values for property owners, quality of life, and affect the health for landowners here?

2207 BO

How much activity will occur at night, vs. the day, and where will night time sound levels be the highest? Where will daytime levels be highest?

The Air Force must provide a detailed study, analysis and accounting of all the past Air Force-caused fires during on-the ground or in-the-air activities in these MOAs and/or in the use of the Owyhee County ranges. Please be sure to provide specific information

How much do you spend annually in treating weeds on fire-disturbed or other lands in association with the remote ranges and other facilities? Who paid for the rehab costs in association with planting, rehab or other efforts on fires on Air Force or BLM lands that have been caused by the Air Force? What have the costs been, per fire?

We understand that the first place in Owyhee County to become infested with the alien invasive species rush skeletonweed, was on Saylor Creek in fire-disturbed lands. We recall the Air Force using large planes to spray herbicide (Binder, pers. comm. at SIG meeting several years ago). Please provide a detailed accounting of this invasion, and current extent of this or other weed infestations. Unfortunately, skeletonweed was not controlled, and now spread onto surrounding BLM lands (Fite, pers. obs). Thus, the Air Force introduced a weed that is now causing serious new threats to public wild lands and wildlife. It is essential that the Air Force consider the cumulative impacts of its disturbance on top of the other serious environmental concerns related to grazing and fire here, on important and sensitive species and their habitat. How do active or inert ingredients or contaminants in herbicides used in wake of military disturbance inter-react with contaminants or pollutants from the planes or training activities or bombs or bomblets?

Please provide a detailed analysis of how the various frequencies and noise levels of the F-15, and any and all other planes, helicopters or motorized or mechanical equipment will affect these wild lands.

We are very concerned that USFWS did not tell you that you needed to consider impacts on the Jarbidge bull trout and its habitats. These fragile watersheds underlie the MOAs you will be flying over.

What has become of the Red Flag, composite Wing, mass aircraft training activities that dated from the previous EIS? Will these planes be engaged in similar activities (large numbers of aircraft of different types), and if so, what will be the noise levels, impacts – including pollution, stress and likelihood of wild land fire - effects of such combined uses?

Will there be aerial refueling? If so, what are the risks of contamination – of Bruneau snail habitat, Jarbidge bull trout habitat, redband trout habitats, scarce high desert springs and seeps, etc. How might spilled fuel contaminate springs, intermittent or ephemeral drainages, or streams?

2207 BO

We are very concerned that you may be using outdated, or heavily biased noise modeling that relies overwhelmingly on “averaging” of noise to mask impacts. The noise metrics - like L-max, SEL, Lds, etc. must be expanded to include new methodology. We ask that you have the noise information peer-reviewed by an outside panel with no connection to the military, and a report that is able to be understood by average citizens be prepared. We are particularly alarmed at the use of a certain noise levels (such as 65 db) that may applied as thresholds. You are dealing with remote wild land country in many areas, and these noise levels are greatly excessive. Plus, you must fully consider the impacts of the entire range of frequencies, and variation between plane type or maneuvers in frequencies emitted. My ears experience a dull ache for a long period after being subjected to low level flight noise. This is something that simply is not captured in your discussion or metric application, as nearly as I can decipher in the confusing EIS discussion.

Please also be sure to let us know if you need further information on any of the links, scientific references especially in relation to arid lands ecosystems, or other information in our previous comments on this matter.

We are very concerned that the information on the ambient and other air quality effects does not take into account the impacts of pollutants – such as heavy metals or particularly harmful materials that may be present in small but harmful amounts.

What materials may be released in fires from flares, bombs, bomblets, drones, white phosphorus, or ground-based activities related to this or foreseeable acts here? I just read a study showing that forest fires in the West are now releasing mercury into the air – and much of the mercury comes from Nevada mines. How much mercury, or other toxic material will result from training uses? How will these materials add to other contaminants here? What will be the toxic brew released in fires?

What contaminants would occur at crash sites?

While it is nice that the AF mentions “weapon footprints” – you do not reveal their boundaries – or the consequences of those that do, on occasion, fall outside the area. This includes consequences for watersheds, wildlife, wild lands.

Please provide a detailed account of any radioactive material, including low-level radioactive material or contamination that may be related to these activities. For example, Tables list A-10s. These planes use Depleted Uranium. Is there any foreseeable use of that material here? Do plans flying over the airspace ever carry “real” “live” bombs, DU, whatever? If so, what are the chances of a mishap or accidental firing of the real weapon, DU, or contamination of the aircraft with DU or other harmful material that could contaminate wild land areas?

What all laws, clearances, ad regulations govern flying over a broad land area that includes several states?

2207 BO

Please provide a detailed accounting of any use of lasers that may occur here. Where, what safeguards, potential of harm.

What materials are in fire retardants, and how may they interact with pollutants from this training activity?

WWP has a special interest in pollutants, contaminants, use of lasers, noise that may impair hearing, etc. We are engaged as a result of a Settlement Agreement with BLM and livestock interests, in active monitoring on-the-ground monitoring in Jarbidge lands. Thus, WWP's staff and its members who recreate here may suffer harm to their health if the full effects are not revealed, and necessary safeguards provided.

Also, we note that the Bush Administration continues to promote "Divine Strake" or any other foreseeable – to the concern of residents across the West. What potential contaminants from Divine Strake (nuclear, other harmful materials) may be deposited in the areas under the MOAs, and how might any Air Force disturbance such as training-related fire, affect release of any harmful substances?

Sincerely,

Katie Fite  
Biodiversity Director  
Western Watersheds Project  
PO Box 2863  
Boise, ID 83701

2207 BO

June 7, 2006

Nathan Rowland  
Deputy Base Civil Engineer  
1030 Liberator Street  
Mountain Home AFB, ID 83648  
[366wgpa@mountainhome.af.mil](mailto:366wgpa@mountainhome.af.mil)

Dear Mr. Rowland,

Here are some comments of Western Watersheds Project and the Committee for the High Desert on the Draft EA "Employment of the 2.75-inch rocket at Saylor Creek Air Force Range.

We are very concerned about potential serious adverse effects of this proposal on both human health and the environment, including the health of our members who use the public land areas where accidents and mishaps (including disastrous wild land fires) form use of the white phosphorus and other devices may occur.

The population of southwest Idaho, and recreational activities across public lands are dramatically expanding. Idaho is the third fastest growing state in the nation. Human use across public lands in the vicinity of Saylor Creek and northern Owyhee and Twin Falls Counties has increased dramatically since any previous Bombing Range (Saylor Creek, Juniper Butte/ETI, etc.) analyses of direct, indirect and cumulative or additive impacts of Air Force air and ground actions was completed.

Plus, we have learned that there are proposed airspace changes and other military activity changes being put in place in northern Nevada and elsewhere that may be linked to the Air Force, National Guard, or other military training activities on the Saylor Creek or ETI ranges and the airspace used by, or linked to, these ranges. What are the direct, indirect and cumulative impacts of the various airspace and activity changes, and what activities may they be linked to?

Besides these changes that appear to be underway, the Air Force and other training activity and missions have changed dramatically since any environmental analysis has been conducted over use of airspace. The Composite Wing seems to have evaporated.

Are airspace overflights, flight height, types of aircraft, methods of training, use of flares, chaff, supersonic flight, flight distances AGL or other devices or actions in country that ranges from the Pequot Mountains area of northern Nevada to the airspace over the Jarbidge Wilderness in any way related to Saylor Creek training, re-alignment of missions, and other training activity changes? We are very concerned that we have not received any information related to the Jarbidge Nevada country airspace changes, and how they might affect activities over Idaho lands.

On a typical weekend day, dozens of vehicles drive the main Bruneau-Desert Road very near the area where this use of the bombing/illuminating white phosphorus or other materials and activities would be conducted.

Visitors come to view the scenic Bruneau canyon, or to drive south into the desert – with activities ranging from floating the Bruneau and Jarbidge Rivers to birdwatching. In fact, this area is receiving even greater use in fall, winter and early spring as it is one of the few largely snowfree outings available in winter.

This EA appears to involve primarily a National Guard action, so why is the Guard not preparing this EA? We can not really understand why the National Guard can not use the facilities at the Orchard Training area, which seems to have become much better controlled than the Saylor Creek Range activities. Certainly, occasional certification activity at another more distant range with more regular certification at the same range seems a very viable alternative action, and would add comparatively little in time or cost – in the larger scheme of operations.

We have also, through review of materials related to slickspot peppergrass, come to regard the care taken by the National Guard at Orchard to surpass that of the Air Force. In short, the Guard after problems were identified has acted responsibly in addressing impacts to slickspot peppergrass at its range, while the Air Force has unfortunately acted to increase livestock trampling and livestock facility disturbance in the heart of LEPA habitats.

How Will This Proposed Action Be Linked with Other Potentially Harmful Activities? As we understand it, the Air Force uses flares, chaff and even lasers on Saylor Creek, as well as flares and chaff and electronic emissions equipment in training over vast land areas. How will the human health effects of all activities related to Air Force and Guard training interact with these new uses, devices and activities? What are all direct, indirect and cumulative impacts to human health as well as recreational, scientific, and other activities on the public lands?

What are the noise levels associated with the use of the devices and activities of the Draft EA, or other actions the military may be engaged in, and how might this increase noise levels analyzed under previous environmental documents?

What are the current flight patterns, use of air space, ground-based activities, etc. associated with training in southern Idaho, and how might actions of the EA or other military activity changes in this region alter, change or shift use of airspace, timing of use, patterns of use, flight levels of use or any other airspace activity assessed in other environmental documents?

We are very concerned that the EA fails to explain how the proposed action affects the timing, duration, and impacts to soils, watersheds, waters, wildlife, recreational and other values of the public lands.

The EA fails to provide necessary baseline data on the condition of local and regional habitats and populations of native biota, and how both current and expanded/changed actions of the EA might affect them. Reliance on mid-1990s biological surveys in no way provides a 2006 baseline of biological information. Since that old (and even at the time incomplete for many species of wildlife) data was collected, large-scale environmental change – including the advent and explosion of new weedy species such as rush skeletonweed on Saylor Creek has occurred. Even greater large-scale wildfires have occurred, and destroyed vast acreages of wildlife habitat, with federal agencies planning even more acres of crested wheatgrass or other alien species. Ranchers have greatly increased stocking rates of domestic livestock – especially through the use of TNR – and this has only heightened fire danger, as extremely flammable cheatgrass and other weeds or spreading in the interspaces of the intensively grazed vegetation communities in and surrounding Saylor Creek. This results in earlier season fires, and even further shortening of the fire cycle.

The Air Force must fully assess the impacts of its actions and likelihood of new and expanded harmful environmental impacts – including local and regional extirpation of sage grouse or other wildfire populations if even more fires and disturbance sweep Jarbidge wild lands. The Air Force must fully detail the expense and uncertainty associated with re-establishing habitats or scenic wild lands that may be irreversibly altered by fire, subsequent weed invasion, contamination with toxic or polluting substances, or other likely outcomes of actions described in the EA.

The EA provides no baseline, and especially no quantification, of existing night time military training activity across southern Idaho, nor how this might disturb, stress or kill native wildlife. Mortality may occur from disturbance and displacement to sub-optimal habitat – including during stressful winter periods, night-time activities or noises startling birds such as sage grouse or migratory birds and flushing them from nests and increasing vulnerability of birds and nests to predation, forcing wintering mule deer or antelope into suboptimal habitats, collisions with fences or vehicles, etc. How will activities of the EA increase disturbance?

What is the current location, configuration and impacts of fencing and other infrastructure related to livestock that may serve as impediments to native wildlife movement across Saylor Creek and surrounding lands where the impacts of activities linked to the EA may occur?

How might increased ground-based activities (driving remote roads) increase or alter impacts on wildlife – including both mortality and displacement?

What is the existing roading/route network in the area, and how will any upgrading, maintenance or use of this network for undertakings related to the EA actions affect wildlife, recreation, expansion of weeds, fire danger, habitat alteration or loss, etc.?

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What other activities and sites may the aircraft carrying these flammable and dangerous devices visit or overfly in the same mission or sortie? What are the chances of mistaken release of the dangerous and flammable devices during training occurring in the wrong place – such as over the Bruneau Canyon, or in the midst of a sage grouse lek complex?

The Air Force must provide a current and comprehensive wild land fuels inventory for all lands that may be affected by this proposal. It must include a consideration of ongoing (livestock trampling and grazing) increasing weeds and hazardous fine fuels, including unpalatable seeded exotics. The BLM reports that the weedy and exotic species fuels situation has become so bad that some areas of the northern Jarbidge are suffering multiple fires within the same year!

How has information from the requirements of the various INRMPs been incorporated into this analysis? For example, the INRMPs require annual meetings with IDFG to alter or make changes to activities – such as use periods – or avoidance of use - of emitters or other facilities and roading. What has occurred with this, and how might that affect actions associated with the EA?

The EA provides no quantification of existing training missions and activities by these and other aircraft at the SC range or using associated airspace. How will this be changed or altered? What other training activities – by any kind of aircraft or ground-based activity – would be occurring at the same time as the EA actions?

The Purpose and Need and Alternatives sections fails to take into account a wide variety of flight time-saving actions that may occur, such as increased bundling of missions or reconfiguration of training activities - including by various parties, or use of other less flammable illuminating devices.

A Full Range of Alternatives must be considered, including the following: Efficiently combining and streamlining activities so that such things as in-air fueling or other practice maneuvers could be used along with travel to train/practice at less environmentally sensitive remote ranges. Training at Orchard. The EA fails to reveal how much time the parties who may use this range may spend traveling to other areas to practice now, and how it would be possible to combine this activity with other training requirements.

The AF fails to analyze use of non-live, non-phosphorus devices/ordnances. We had understood that the Air Force was NOT using live ordnance anywhere. Now suddenly this EA is written as if use of these dangerous materials is just routine. Certainly the technology exists to use alternative illumination/devices, that would have far fewer impacts to the environment. What alternative materials can be used?

Use of which range would minimize environmental impacts?

Past and Current Uses. What has been the past and current use of the materials described in this EA at all ranges or other areas where they have been employed? What environmental problems and risks have been identified? What unplanned or accidental

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detonations/explosions/bursting into flames have occurred? What lands have burned up as a result? How do lands where these devices have been used in association with Hill AFB or other areas differ from the Saylor Creek lands? Doesn't a lot of Hill training occur in association with salt flats?

Wind Speed. How is use of any of these materials, or the environmental effects of duds, partial burn-ups, mishaps, etc. affected by wind and wind speeds? What determines the accuracy of use? Who are what may be downwind under various seasons of the year? What chemicals may be released into the air under all scenarios, and how might they affect downwinders or wildlife?

Who trains here (Saylor Creek, airspace, Juniper Butte and emitter range, etc)? Are there pilots from foreign countries, as previously? How many missions of what type have occurred annually since preparation of the ETI ROD?

EA Jargon. The EA uses a lot of jargon that is difficult for the public to understand, especially as it is different from the ETI or INRMP jargon. Much greater explanation of terminology and the environmental effects of actions or scenarios that may be described must be provided in an EIS for this action.

For example, ES-1 describes "rockets provide a means to geographically deconflict airspace above target areas". Does this mean burn up what it is being dropped on?

Please explain what exactly you mean by CAT and JAAT, what actions and effects are associated with these activities, and how they interact. What has become of the whole *raison d-etre* for the Juniper Butte Range and Idaho airspace expansion – the Composite Wing? Has it been re-configured or altered?

What are the noise levels, pollutants released, lands overflown, devices used, and other actions and environmental effects associated with the JAAT, CAS and other military training as described at ES-1 – especially the coordinated attacks? Is this the same as an expanded "red flag" training exercise from ETI jargon days? How may redflag exercises have occurred and how many total airplanes and what types, and what airspace has been used, and what numbers of flares exploded, fake or real bombs dropped, etc. in association with these devices.

How will the JAAT and CAS and associated coordinated or other training activities affect use of the remote emitter No drop, Juniper Butte Range and other land-based military facilities? Will expanded night missions here result in expanded use of emitter sites or the Juniper Butte Range at night? If so, how will this affect wildlife or recreational uses?

What is the separation in activities (time, space, mission activities) between the Guard and the Air Force? How might the proposed relocation of FAA facilities from the Boise area affect Air Force or Guard training activities in Idaho?

You must provide a detailed explanation of the current status of the composite Wing, BRAC process, and current and foreseeable changes. How is this Rocket EA related to the bed-down and operation, airspace use, and other activities of the Composite Wing or its current replacement?

The Air Force in the 1990s separately conducted an EA for helicopter training in Owyhee County? How is this Saylor Creek EA activity related to that? Do the same helicopters operate under that EA? Are there separate or new helicopter training EAs underway or contemplated? What lands are overflowed, and how will that change?

For both the composite wing, helicopter EA, and any other analyses that have been prepared concerning Air Force use of Saylor Creek and southern Idaho lands, please provide a detailed update on how activities have been conducted since finalization of those environmental documents.

What alternative marking or lighting/illumination devices exist that are less toxic or less flammable or less dangerous?

As we understand it, the A-10s carry depleted uranium devices. Will they be contained in the planes as they are involved in the training activities? If so, what is the likelihood that mistakes will be made, and the DU devices dropped too?

Table 6 shows "Air Pollutant Emission Estimates", and we note exceedances of criteria for several compounds. How do these chemicals interact - additively or cumulatively?

What is meant by "cumulative totals by ordnance"? Please provide more information so that the public can understand what the Table is representing.

We recall the National Guard at Gowen Field had a serious life-threatening mishap with chromium-containing compounds. Are these the same chromium compounds as would be used here? What residues will remain in soils at the site? How can soils be decontaminated? What other chemical residues may be on these sites? Are there degradates, or breakdown products of other chemicals used here? How will these react with, combine or otherwise interact? We note that frequent high winds - especially in the disturbed setting of a Bombing Range - may transport these materials onto surrounding public lands.

Will ordnance that has not completely burned up or been exploded be transported on public roads? If so, how will it be transported and what safety precautions will be taken?

How will use of these devices and the toxic or flammable materials that they contain endanger fire fighter safety? What if firefighters are seeking to stop a range fire, and unexploded or incompletely combusted ordnance, rockets, bombs, etc. are burned? How will that affect the nature a wildfire? How will that affect the health or safety of firefighters? What toxic emissions may be given off by unexploded ordnance/bombs/rockets, etc. Please be sure to include ALL materials the rocket

materials contain in this analysis. How do the chemicals in the devices or their residue interact with fire retardant or other fire suppressant materials?

WWP is a party to the Settlement of litigation affecting the vast Jarbidge BLM-managed wild lands, and we are actively engaged in collaborative activities as well as monitoring and other scientific studies that are on lands that are accessed on routes running directly through Saylor Creek and surrounding lands. BLM-managed livestock grazing occurs on lands within the Saylor Creek range itself. Thus, we would be **directly in harms way** of the devices and activities that may be associated with the EA and the expanded and altered training activities.

Here is a summary of the litigation:

\* Western Watersheds Project v. Bennett, 392 F.Supp.2d 1217 (D. Idaho 2005). (based on NEPA and FLPMA violations, enjoining livestock grazing on nearly 1 million acres of Jarbidge Resource Area).

This settlement involves collection of current ecological data and development of a new Jarbidge RMP that examines sage grouse habitats and addresses sage grouse habitat needs across the Jarbidge. As the use of the devices and other activities described in the EA have the potential to greatly expand sage grouse habitat loss through increased disturbance and wildfire, we are gravely concerned about this new proposal.

\* Western Watersheds Project v. Foss, 2005 WL 2002473 (D. Idaho 2005) (reversing FWS decision not to list Slickspot peppergrass under ESA, based on voluntary and inadequate "Candidate Conservation Agreement").

A major impact to slickspot peppergrass is fire and the subsequent invasion of slickspots by weedy exotic species. As large range fires in the northern JFO - such as these rockets could cause - sweep south, significant loss of slickspot peppergrass habitats and populations may occur. With each new fire, cheatgrass and other weeds gain a greater - and increasingly more flammable toehold - across the Jarbidge. Plus, in the aftermath of fires, BLM is still seeding aggressive invasive exotic species such as forage kochia that move into, and choke out, slickspots.

How is grazing in lands surrounding the impact area contributing to hazardous fine fuels such as cheatgrass, and how do cheatgrass and other weeds facilitated by livestock affect rehab or restoration of sagebrush wild lands? Please address these questions, and the combined ecological impacts of military activity and livestock disturbance.

The Committee for the High Desert is a party to litigation and Settlement over the ETI and military activities in southern Idaho. We are concerned that this proposal has not been discussed with parties to the settlement in the SIG. How will it affect the training scenarios, land and airspace use and activities and effects of the ETI analysis and various INRMPS? We appreciate the Air Force responding to our concerns about a meeting during recent phone contacts.

How is the Air Force coordinating its proposed airspace changes or expansion or other training activities in northern Nevada with the EA actions? We fear that airspace and training changes are purposefully being segmented to avoid necessary scrutiny at the level of an EIS.

The EA admits:

*The partially burned munitions pose additional hazards to both humans and animals. When a partially burned munition is kicked or disturbed and air comes into contact with the white phosphorus, the material will start to burn again and could injure the person or animal that disturbed the munitions.... if the white phosphorus munitions is a dud or only partially burns, wildlife, the public, or livestock could be seriously injured if they disturb the munitions".*

The use of such a dangerous and flammable substance in the highly fragile high desert landscape of the Jarbidge is highly controversial, poses a significant risk to human health and the environment.

The EA also describes some of the dangerous nature of the rockets sticking out of the ground.

If these are not detected for a period of years, will their coating decay, and explosions and fire occur at unpredicted intervals? How long will they remain "viable"/"live" and dangerous? How will summer heat affect volatility of the rocket compounds?

How will it be determined where each device lands? Does it have a GPS locator? Can this or whatever locator device may be used be damaged by landing, or otherwise fail? Does retrieval involve motorized equipment, or cross country travel?

The EA is completely nebulous about the period of use. ANY activities should be governed by defined periods of use, and specific triggers to determine when fire danger in the very local area reaches a certain point. We note that this year, cheatgrass dried out in early May in some parts of the Jarbidge.

The EA must describe in great detail just what is meant by the various fire levels, and how does the vegetation present in and around the site affect these levels? What would happen under exceptional circumstances – would use be allowed to proceed, anyway?

The language governing use of these dangerous devices is loose and full of loopholes. Describing activities as "typical". When are ALL time periods, under ALL circumstances, when these flammable devices would be used?

When will they be cleaned up? Will this occur during spring or summer fire periods? If the AF waits 75 days to clear targets where these devices are fired in March, it will be well into the Saylor Creek fire cycle.

The Air Force itself has started range fires on Saylor Creek that spread onto BLM lands by burning tumbleweeds in mid to late October.

Have you consulted with USFWS over the potential impacts of chemicals in runoff on Snake River snails?

The "rugged" vegetation is highly flammable especially when the interspaces become infested with cheatgrass.

Public danger would come not only from the unexploded ordnance, but also from the possibility of being close to mis-fired munitions.

We are unclear about the use of the term "munitions". Does this mean the white phosphorus is also considered to be a weapon (as has been claimed by citizens concerned with its use in Fallujah and other locations), as well as an illumination device?

The EA states that TAP standards have not been established. Does that mean that there is no regulation of any kind – either state or local, of the TAPs from these or other devices or munitions used by the AF here?

EA at 39 – Please provide details on the percent of the land dominated by cheatgrass, as well as the percent presence of cheatgrass in understories.

1995 habitat mapping and raptor nesting surveys are long-outdated. Surrounding BLM lands contain several important and special status species --- Brewer's sparrow, loggerhead shrike, sage sparrow, burrowing owl, and others.

What numbers of mule deer have been observed in the winter?

What surveys have been conducted of wintering rough-legged hawks or other raptors?

Will additional powerlines or other infrastructure be required for these activities?

Please provide detailed mapping of the sage grouse lek locations on Saylor Creek as well as surrounding BLM lands, as these habitats may all be impacted by fires or night illumination from these devices. How large an area will illumination occur over/be visible from? How might wildlife on BLM lands be startled or displaced by illumination or sound or other activities associated with the use of the devices?

EA at 3-21. What other pyrotechnic munitions are used here? What happens if one of these hits a dud white phosphorus munition?

Table 5 (EA 3-21) does not present 2005 data. Where is it?

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How much chromium, hydrazine and nickel and other hazardous or toxic material would be contained in 2500 rockets annually, including 500 white phosphorus munitions?

We are very concerned that fires or other actions resulting from use of these materials would result in livestock permittees shifting or intensifying livestock use in other areas - including native communities on BLM lands.

Please describe the conflicts associated with pronghorn antelope.

The EA makes a ridiculous assumption concerning sage grouse -claiming that because some leks may persist under disturbance, training in the EA is somehow compatible with sage grouse) and additional disturbance is unlikely (EA at 4-8).

We are attaching a bibliography that contains scientific articles related to the sagebrush environment at Saylor Creek, and the impacts of various kinds of disturbance to the vegetation and wildlife.

Sincerely,

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**The Impacts of Energy Development Noise on Breeding Greater Sage-Grouse**

Jessica Blickley, UC Davis, Evolution & Ecology  
3:10 to 4:00 p.m. – 1003 Kemper Hall

**Abstract:** Infrastructure from recently increasing energy development has resulted in a dramatic increase in noise across the landscapes of North America. Recent studies suggest that noise from such development may negatively impact wildlife, yet little is known about the causes and consequences of this impact. Further, most previous studies have not been designed to isolate noise impacts from other confounding factors. This study is investigating the impacts of energy development noise on greater sage-grouse (*Centrocercus urophasianus*), a species of management concern across western North America. Sage-grouse are declining in areas of natural gas development and circumstantial evidence suggests that noise is a cause of this decline. To test this hypothesis, control leks and leks with experimentally-introduced energy development noise were monitored for three seasons. Noise playback resulted in immediate and drastic declines in lek attendance by male sage-grouse relative to paired controls. Additionally, males remaining on noise leks had elevated levels of fecal corticosterone, suggesting that noise exposure has widespread physiological and behavioral impacts. The results will be discussed in the context of current and proposed noise regulations for natural gas and other forms of energy development, including wind. As the first long-term playback experiment investigating the chronic impacts of noise on any wild population, this study presents a unique opportunity to experimentally address noise impacts on avian behavior and spatial distribution while informing energy development policy and wildlife management decisions.

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Quail Creek Republican Club  
795 N. Alexis Loop  
Green Valley, AZ 85614

March 11, 2012

David Martin, Air Force Contractor, and Kim Fornof  
HQ AETC/A7CPP  
266 F Street West, Bldg. 901  
Randolph AFB, TX, 78150-4319

Dear Sirs,

Quail Creek Republican Club wholeheartedly supports the efforts of the 162nd Fighter Wing Minuteman Committee in its mission of championing Tucson International Airport as one of this nation's premier fighter pilot training installations as a pilot training site for the next generation of U.S. Air Force fighter, the F-35.

The Arizona Air National Guard has long served this nation as a pilot training center and this community as a powerful economic force. The 162nd Fighter Wing's adds \$280 million to the local economy and employs about 1,540 Tucsonans. This positive impact cannot be overstated. The advantages of pilot training in Arizona, its consistent weather, its ranges and its existing military aviation infrastructure, are clear. Equally important is the community support for the continued role of the Guard and its mission. We look forward to the base's future prosperity.

Thank you for the opportunity to provide input for this very important and effective partnership.

Sincerely,

John Emery  
President

Jan Noll  
2nd Vice President

George Norcross  
Treasurer

Darren Venters  
Program Chair

Lee Cornelison  
Vice President

David Worth  
Secretary

Stephanie Reynolds  
Membership Chair

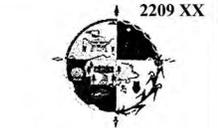
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THE  
NAVAJO  
NATION

Historic Preservation Department, POB 4950, Window Rock, AZ 86515 • PH: 928.871-7198 • FAX: 928.871.7886

BEN SHELLY  
PRESIDENT



REX LEE JIM  
VICE-PRESIDENT

March 20, 2012

David F. DeMartino  
Colonel, USAF  
Department of the Air Force  
HQ AETC/A7C  
266 F Street W., Building 901  
Randolph AFB TX 78150

Dear Mr. DeMartino:

The Historic Preservation Department-Traditional Culture Program (HPD-TCP) is in receipt of the proposed project regarding the F-35A Training Basing Draft Environmental Impact Statement.

After reviewing your consultation documents, HPD-TCP has concluded the proposed undertaking/project area **will not impact** Navajo traditional cultural resources. The HPD-TCP, on behalf of the Navajo Nation has no concerns at this time.

However, the determination made by the HPD-TCP does not necessarily mean that the Navajo Nation has no interest or concerns with the proposed project. *If the proposed project inadvertently discovers habitation sites, plant gathering areas, human remains and objects of cultural patrimony, the HPD-TCP request that we be notified respectively in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA).*

The HPD-TCP appreciates the Department of the Air Force's consultation efforts, pursuant to 36 CFR Pt. 800.1 (c)(2)(iii). Should you have any additional concerns and/or questions do not hesitate to contact me electronically at [tony@navajohistoricpreservation.org](mailto:tony@navajohistoricpreservation.org) or telephone at 928-871-7750.

Sincerely,

Tony H. Joe, Jr., Supervisory Anthropologist (Section 106 Consultations)

NA-4

Final  
June 2012