Holloman AFB F-16 Training Airspace Expansion

Speak Up to Protect Our Home and Livelihoods from F-16 Training!

Holloman Air Force Base (AFB) in Alamogordo wants to expand its F-16 pilot training airspace across southwestern New Mexico. Although the Air Force acknowledges that current airspace is adequate for F-16 combat training, it proposes an annual additional of 10,000 sorties, discharge of 15,000 flares and 15,000 bundles of chaff. **The future of Holloman AFB is not at risk. We shouldn't sacrifice the Gila, America's first wilderness, and other special places in southwestern New Mexico.** This region is critical to state and local tourism, retiree, and outdoor recreation economies.

Holloman's Alternatives 2 and 3 would create 7 million-acres of military training airspace over southwestern New Mexico including training flights for low-level (500 feet Above Ground Level), high-level (above 13,500 Mean Sea Level or about 7500 AGL depending upon location), supersonic (above 30,00MSL) and nighttime training.

Population centers impacted include the Rio Grande Valley communities of Socorro, Truth or Consequences, and Las Cruces; Gila Gateway communities, including Silver City, Bayard, Santa Clara, Hillsboro, Kingston, Cliff, and Gila; and northern, including Datil and Magdalena.

Impacts include:

- **Extreme noise** from training operations that will disturb the peace and quiet of rural communities and national forests and wilderness areas.
- **Dropping of flares** poses a significantly increased level of **wildfire risk** to an area already vulnerable to catastrophic wildfire that doesn't have many resources for firefighting.
- Use of **chaff pollutes** our **environment**.
- Military training over our area puts people at **risk from military aircraft crashes**, **affects the thousands of veterans** that have sought refuge in our communities to heal PTSD, and startles horses, livestock and wildlife **affecting ranching, hunting, and backcountry recreation.**
- These impacts **undermine the quality of life and the natural amenities that are the foundation for retiree, local tourism and outdoor recreation economies**

The Air Force acknowledges that Alternative 1 -- expansion and reconfiguration of Talon MOA, east of Alamogordo -- meets its additional training needs with the fewest risks and impacts because it builds on existing airspace. We recognize the role of Holloman's F-16 pilot training mission to national defense. Alternative 1 best meets those needs.

Comment on the Draft EIS for the Holloman F-16 Training Airspace Proposal

The Air Force has released its Draft Environmental Impact Statement (DEIS) on proposed alternatives to expand the Holloman Air Force Base Special Use Airspace. We need your help providing substantive comments on the DEIS. Submit your public comments by January 31, 2020.

You may submit your comments via Peaceful Gila Skies at https://actionnetwork.org/petitions/f-16

For more information, contact Peaceful Gila Skies

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Major Conclusions from the Draft Environmental Impact

- **The Air Force admits that its current airspace is adequate for its F-16 pilot training mission**. If the current airspace already meets Holloman's needs, the Air Force does not need to create a 7 million acre MOA that threatens the Gila Wilderness and other natural and cultural areas central to the region's tourism and outdoor-based economy.
- **Alternative 1 meets the needs of Holloman's F-16 pilot training mission with the smallest footprint and impact.** The Air Force wants to "optimize" the airspace for F-16 pilot training. By building on existing airspace, Alt. 1 meets Holloman's needs with a third the area of Alternatives 2 and 3 and without the severe economic and environmental impacts to SW New Mexico. Alt. 1 has a much smaller amount of forested land, therefore less risk of wildfire relative to Alternatives 2 and 3.
- **Alternatives 2 and 3 will cause significant negative impacts to SW NM**, putting the region at increased risk of catastrophic wildfire from flares, increased noise, environmental effects from chaff, and negative impacts to tourism, retiree and local outdoor-based economies.
- **Alternatives 2 and 3 are overkill for Holloman's F-16 training airspace needs**. Holloman has admitted that its current airspace is adequate for its training mission, although it wants to improve airspace efficiency. Alternative 1 satisfies the airspace optimization goal with the smallest footprint and least amount of impact. The impacts from Alternatives 2 and 3 are disproportionate to the need.
- **Alternatives 2 and 3 create a continuous block of military training airspace from Phoenix to the Eastern NM.** This block would be the largest mix of MOAs, Air Traffic Control Assigned Airspace (ATCAA), and restricted airspace over any land in the continental U.S. It would be a magnet for more training use in the future from other bases, including F-35s from Davis-Monthan that are reportedly four times louder than the F-16. This would be a radical increase in military training in southern New Mexico.

DEIS does not adequately describe the baseline level of sorties

- The DEIS states that the new expanded airspace must accommodate 10,300 sorties, yet it is not taking into account the 8,972 sorties that will continue at White Sands Missile Range, Beak MOA, and Talon MOA. **The Holloman proposal doubles the airspace capacity beyond what the DEIS says is needed.**

Transient aircraft using new airspace will be more than estimated

- The DEIS estimates that there will be 1,300 sorties conducted by transient aircraft originating outside of Holloman AFB. However, there is no limit to how many transient aircraft can use the MOA. **Creating such an expansive airspace will encourage the use of the Gila Region for more military training.**

Despite our scoping comments, the Air Force has not adequately evaluated impacts of Alternatives 2 and 3 on quality of life, public safety, environment, endangered species, and natural & cultural resources & local economies

Noise

- The DEIS admits that there would be a **perceptible increase to the subsonic noise levels attributed to aircraft activity** to some areas beneath the proposed MOAs and ATCAAs.
- When an F-16 fighter jet flies at full power 500 feet overhead, a person on the ground below will hear 116 decibels of noise—**as loud as the siren of a fire engine 25 feet away.** The proposal by the Air Force for Holloman AFB to conduct 10,000 annual sorties of F-16s practicing combat maneuvers as low as 500 feet above the mountains and valleys of southwestern NM will clearly generate a lot of noise in a quiet area both day and night. Approximately one thousand of the sorties will cause sonic booms.
- **Loud aircraft noise is widely recognized as an environmental problem**. It can harm hearing. It disturbs sleep. It startles people repeatedly and can lead to hypertension, coronary disease, and impairments to

human neuro-endocrine systems. Even low levels of aircraft noise can cause distraction, fatigue, irritability, headache, nausea, and impaired concentration and memory.

- **The greatest change in Day-Night Average Sound Level (DNL) would be at Magdalena and Old Horse Springs.** Although predicted values would be below the threshold for land use restrictions, the DEIS estimates that some of the population beneath the proposed airspace would be expected to be highly annoyed at the subsonic noise.
- **The noise evaluation method used in the DEIS does not adequately predict noise from F-16 training, nor does the DEIS analyze the effects of noise**, including the impacts of noise from F-16 training on visitation to national forests, national monuments and state parks, within proposed MOAs and ATCAAs.
- **F-16 training is incompatible with the uses of Wilderness areas**. Because the Wilderness Areas of southwestern New Mexico offer natural quiet, visitors come from around the world and veterans with PTSD seek peace and solitude in these areas.

Wildfire Risk

- **The large amount of forested areas in Alternatives 2 and 3, puts this region at severe fire risk so flares should not be used**. Three catastrophic wildfires have occurred over the past decade in the Gila National Forest and Gila and Aldo Leopold Wilderness Areas, burning nearly 500,000 acres, including the Whitewater-Baldy Complex Fire that is the largest fire in New Mexico history. Climate change and long term drought have caused a dramatic decrease in winter snowpack in the mountains, making the Gila extremely vulnerable to wildfire.
- **Mitigation measures for flares such as adjusting altitude and timing of flare release according to National Fire Danger Rating are not foolproof**.
- **Mountainous terrain within proposed airspace makes it difficult to fight a fire.**
- **Local first response is not adequate to respond to fire** caused by a flare or an aircraft crash within the proposed airspace. DEIS says federal land managers and local first responders would be responsible for cost and suppression of any fires caused by flares or a crash.

Public Safety

- **Local first response is not adequate** to respond to an aircraft crash within the proposed airspace.
- **The Aircraft Mishaps Analysis in the DEIS should examine the rate of mishaps during F-16 training** rather than the overall rate of mishaps since the aircraft went into service.
- There have been six crashes of F-16s in 2019 – two from Holloman, two from other USAF bases and two foreign. http://www.f-16.net/; https://www.airforcetimes.com/news/your-air-force/2019/10/30/f-16-crashes-at-holloman-pilot-ejects/
- Loud, low-flying aircraft can easily spook horses and mules, who may throw their riders, causing injuries and even fatalities to equestrians, hunters, packers, and outfitters who frequent areas throughout the Gila and Cibola National Forests.

Low altitude avoidance and noise sensitive areas for the proposed airspace are not identified/not sufficient.

- Avoidance areas have not been identified in the DEIS, making the proposal impossible to evaluate. Further, Alternative 2 does not exclude the avoidance area already established for VR-176 over the Gila Wilderness.
- It is also unclear how aircraft would avoid congested areas of a city, town, or settlement in accordance with FAA minimum safe altitudes.
- The FAA's minimum distances between F-16s and populated areas within the proposed MOAs is very low for training purposes and do not seem sufficient to ensure public safety.
- Avoidance areas over the Gila Wilderness have been insufficient to protect communities and important natural and cultural resources and adherence to avoidance areas is not being enforced. Military pilot training already violates the minimum floor over the Gila Wilderness and Gila Cliff Dwellings. It has proven impossible to stop these violations, even though these incidents are reported to Air Force bases.

Chaff

- The Air Force proposes to release 15,360 bundles of military chaff into the air anywhere within the 7 million acre MOA.
- **Chaff should not be deployed over Wilderness Areas, National Parks and Monuments and other protected areas according to the Air Force's operational restrictions.**
- **The DEIS does not adequately assess the potential impacts of chaff on the environment and public health**, including: I) drift of the chaff; II) chaff's impact on waters and species in the area; and III) potential for inhalation of the chaff fibers or degraded debris that have accumulated over time.

Natural Resources and Cultural Resources

- Alternatives 2 and 3 will significantly impact natural and cultural resources that are the foundation of the region's tourism, retiree and outdoor recreation economy, including:
    - Parts of the Gila and Cibola National Forests, including the Gila, Aldo Leopold, Mt. Withington, Apache Kid wilderness areas totaling approximately 700,000 acres and wilderness study areas;
    - Gila Cliff Dwelling National Monument and Organ Mountains Desert Peaks National Monument and associated Robledo Mountains and Sierra de las Uvas wilderness areas;
    - Bosque del Apache Wildlife Refuge and Bosque del Apache Wilderness;
    - Elephant Butte Lake and Caballo Lake state parks;
    - Areas that are critical refuges for endangered species.
- These are world-class resources and visitors hail from New Mexico, the U.S. and around the globe.
- Retirees from across the country relocate to our region due to these amenities.
- **Combat training is incompatible with the purpose of Wilderness**. Wilderness areas are set aside as refuges from human intrusion.

Tourism and Outdoor Recreation

- Increased noise and visual intrusion of proposed F-16 training will reduce tourism and outdoor recreation opportunities, such as hunting, hiking, camping, bird watching, fishing, horse/mule packing, kayaking/rafting/boating, and visitation at cultural sites in southwestern New Mexico.
- **The DEIS failed to assess the impacts of Alternatives 2 and 3 on tourism and outdoor recreation activities that are the basis of local economies**.

Local Economic Impact

- The DEIS did not evaluate the impacts of Alternatives 2 and 3 on local economies, including the local economic impacts of reduced tourism and outdoor recreation, reduction in housing prices, ranching, and other direct and indirect economic impacts.

Veterans

- Many veterans recreate on public lands and move to quiet rural communities as a means for healing from PTSD. Exposing veterans to F-16 combat training flights would not only remove the healing aspects of the quiet forest and local communities, but could actually cause further damage.

Cumulative impacts are significant and have not been adequately assessed in the DEIS.

- **The DEIS does not include the cumulative impacts of current and proposed military training** within VR176, Reserve/Morenci/Rustler, and Cato/Smitty, and Davis-Monthan Personnel Recovery Training.
- **The Gila Region already experiences impacts from military training within VR176.** Areas of the Gila National Forest and wilderness areas lying beneath VR 176 already experience the negative impacts from military aircraft noise, startle to livestock, danger to horse riders, and depreciation of value of recreational properties due to extremely low flights (below 500 AGL).