

July 13, 2020

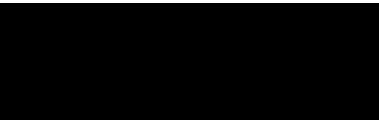
Ms. Sandy Watts
Acting Regional Forester
Southwestern Region
333 Broadway SE
Albuquerque, NM 87102

Dear Ms. Watts:

Thank you for the opportunity to submit objections to the Draft Decision and Finding of No Significant Impact for Military Training Exercises within the Cibola National Forest near Kirtland Air Force Base, New Mexico, May 2020 and the Final Environmental Assessment of Military Training Exercises within the Cibola National Forest near Kirtland Air Force Base, New Mexico, May 2020.

The attached document provides details of my objections to the Final EA and Draft Decision. Please feel free to contact me with any questions or concerns.

Sincerely,



Arian Pregenzer



Attachments:

1. Objections to Draft Decision and Final EA, July 11, 2020
2. Attachment A: [Comments on Draft EA, August 20, 2013](#)
3. Attachment B: [Comments on Draft EA and Questions for Forest Service, November 22, 2013](#)
4. Attachment C: [Comments of Draft EA, Documentation of Damage, and Correspondence with Elaine Kohrman, February 3, 2014](#)
5. Attachment D: [Correspondence with Elaine Kohrman Regarding Air Force Field Trips, April 15 and July 1, 2014](#)
6. Attachment E: [Correspondence with Elaine Kohrman Regarding Air Force Suitability of Assessment of Military Lands, October 22, 2014](#)
7. Attachment F: [Resolution of Objections to Draft Decision Magdalena Ranger District Travel Management Plan, July 22, 2015](#)

Objections to:

“Draft Decision Notice and Finding of No Significant Impact for Military Training Exercises within the Cibola National Forest near Kirtland Air Force Base” by the USDA Forest Service, May 2020

and

“Final Environmental Assessment Military Training Exercises with the Cibola National Forest near Kirtland Air Force Base” by United States Air Force, Air Education and Training Command, May 2020

Arian Pregenzer

Commentator F-1, C-1, C-3, C-53, C-57, and C-142 in the Final EA

July 11, 2020

I own 160 acres about 15 miles north of [REDACTED], NM on County Rd 354. My residence lies directly under the flight path for aircraft utilizing the Helicopter Landing Zone 26 (HLZ 26) and is heavily impacted by the noise. My property is also completely enclosed by the “tactics training area” for ground-based training and is within sight and hearing distance of the new base camp location.

In 2013 and 2014 I wrote detailed comments objecting to the Draft Environmental Assessment of Military Training Exercises (in Appendix A of the Final EA I am identified as Commentator F-1, C-1, C-3, C-53, C-57, and C-142.) These comments and subsequent correspondence with the Cibola Forest Supervisor Elaine Kohrman are appended to the end of this document. More than 100 citizens and organizations wrote comments making many of the same points. In 2014 a number of us had field trips with the Air Force to tour the existing Helicopter Landing Zone and to survey the areas used for tactical training. During these field trips, we received promises from the Air Force to not overfly private residences, to not drive heavy vehicles near residences or off-road, and to notify residents in advance of training activities. None of these promises have been kept.

The final EA does not meaningfully address my objections or those made by others. In fact, when the first edition of the Final EA was published in August 2019 it failed to list and respond to any of the comments from 2013 – 2014. After this oversight was pointed out, eight months elapsed before the current version of the Final EA was published in May 2020. It differs from the 2019 version only by the addition of an Appendix listing public comments and cursory responses. It differs only marginally from the Draft EA of 2013.

As I reviewed the numerous comments listed in Appendix A, I noted that only 5 commenters supported military training in the Cibola, in contrast with 142 commenters in opposition or requesting significant changes. None of these changes were made and no discussion was offered about the reasons for ignoring them. This is not reassuring about the value the Air Force and Forest Service place on public opinion.

I disagree with the conclusion of the Cibola Forest Supervisor Steve Hattenbach that the Proposed Action, which includes building three new helicopter landing zones (HLZs) and continuing land-based training at an increased level in the Magdalena Ranger District, has no significant impact on either the environment or the residents of this area. The Final EA addresses few of the issues brought up in comments of the many citizens who objected to the Draft EA in 2013 and 2014. Most significantly, the Final EA:

- Fails to represent the full scope and depth of public involvement and concern,
- Fails to include a range of reasonable alternatives,
- Fails to adequately assess the impacts of training on wildlife and humans and provides no convincing rationale for not conducting an Environmental Impact Statement,
- Presents inconsistent, inaccurate, and incomplete information about training activities, including cumulative impacts of other military activity,
- Ignores proposals for protecting local residents from the impacts of training, and
- Fails to define a credible approach to monitoring military compliance with requirements.

To resolve these objections, I suggest the following:

- Discuss the full range of public concern and involvement in the final EA, how it affected the Air Force's final EA and the Forest Service's Draft Decision.
- Revise the Proposed Action and Alternative 1 to remove training from sensitive riparian areas, move the tactics training area so that it does not enclose private property and provides a 5-mile buffer from private property, propose different flight paths that avoid private property and residences by 5 miles.
- Provide two additional alternatives: Alternative 2: Relocate the training to military land, Alternative 3: Reduce the level of training below that of Alternative 1.
- Reconsider the decision not to conduct an Environmental Impact Statement and re-evaluate the impacts on the environment and humans using updated scientific research and taking into account the testimony of many local residents.
- Correct errors in the EA that provide contradictory information about the numbers of aircraft sorties and events in the Proposed Action, provide exact information about the locations of proposed base camps, and give a full accounting of all land and air military activity in the Cibola.
- Establish an independent and effective means of monitoring compliance with requirements for all military activity in the Cibola.

The following pages provide details of my prior comments, the Air Force's and Forest Service's response, my opinion of the inadequacy of the response, and suggestions for resolution.

1. The Final Environmental Assessment does not accurately reflect the scope and depth of public involvement and concern.

1.1. Comments on Draft EA

1.1.1. Attachment A, August 20, 2013 / Commentator C-1

- Need to “Proactively engage the public, especially in locations near training sites, on the scope of the existing and proposed activity. Public input from such extended outreach should be documented and given careful attention during the decision-making process.”

1.2. Air Force and Forest Service Response

- The Air Force and the Forest Service extended the public comment period and conducted field trips to the Tactical Training area and HLZ 26.
- On Page 1-1, in describing the section “Comparison of Alternatives,” the Final EA states: “These alternatives were developed based on substantial issues raised by the public and other agencies. This discussion also includes possible design features to reduce potential impacts.”
- Section 1.6, Page 1-4 lists a few of the issues raised by the public.
- Appendix A of the Final EA lists 147 commenters, a summary of their comments, and Air Force responses.

1.3. Inadequacy of Response

- The statement that Alternatives were developed based on substantial issues raised by the public is false. No changes have been made since 2013 based on the vast majority of public comments.
- Section 1.6, Page 1-4 is not representative of the range of public comments and concern as reflected in my own comments and in Appendix A. The responses in the Appendix are cursory, inaccurate, and not supported in the text of the final EA in many cases
- There is no discussion of the field trips and subsequent interactions with the Air Force and Forest Service.

1.4. Suggestions for Resolution

- Section 1.6 should be amended to reflect the full range and depth of public involvement, including the overwhelming opposition to increased levels of training. It should summarize field trips, subsequent communications with Forest Supervisor Elaine Kohrman, and provide a discussion of the significant issues. It should also document that of the 147 Commenters listed in Appendix A only 5 registered their support for military training in the Cibola (see Response TY-1 on Page A-23).

2. The Final Environmental Assessment does not include a range of reasonable alternatives.

2.1. Comments on Draft EA

2.1.1. Attachment A, August 20, 2013 / Commentator C-1

- “The level of military training under both “Alternative 1” and the “Proposed Action” would be far more appropriate for military land, ...why has the forest service not asked the military to evaluate the suitability of military land? What criteria have the Forest Service used to determine the suitability of public land for military training?”
- “The military’s criteria for site selection are flawed and limited. The first two selection criteria are essentially the same and can be summarized as “do not increase transportation costs from Kirtland AFB.” These double-weighted criteria, coupled with the failure to evaluate the suitability of military land, foreclose any options other than continued use of the Cibola.” “Develop a meaningful set of site selection criteria that include factors such as preferential use of military land in addition to the cost of travel from Kirtland AFB. In addition, develop a set of criteria to use in evaluating the suitability of Forest Service land for military training.”
- The Air Force should “conduct a thorough analysis of the suitability of military lands in New Mexico and northern Texas for the training proposed on the Cibola.....The analysis should compare their characteristics to the proposed training locations in the Cibola, roadblocks to their being used for training purposes, and options for removing those roadblocks.”

2.1.2. Attachment B, November 22, 2013 / Commentator F-1

- The EA failed to evaluate the use of military land for this training (e.g., the San Andres Mountains within White Sands Missile Range that have varied topography and elevations equal or greater than that of the Bears).
- The EA did not consider alternatives that minimized impact on sensitive riparian areas, including but not limited to Las Cabras Canyon, Bear Springs Canyon, and Baca Canyon in the Bear Mountains. It should consider alternatives that minimize such impacts.
- The EA failed to consider alternatives that reduced the numbers and levels of training exercises taking place within the forest. It should consider such alternatives.

2.1.3. Attachment E, October 2014, Correspondence with Elaine Kohrman regarding Air Force’s “Suitability Assessment”

- We find that the “Suitability Assessment” provides little information other than that included in the EA. In fact, it is mostly statements, rather than analysis. A few examples are listed below (see Attachment E for details).
- Additionally, we request that USFS and USAF address the deficiencies in the “Suitability Assessment” as pointed out above. In particular we request: (1) information about the total budget for PJ/CRO training in the Cibola and the current

costs of training in the Magdalena Ranger District, so that the impact of the incremental costs of moving these activities can be judged, (2) evidence that 15,000 acres within the WSMR's more than 2,000,000 acres are not available for ground-based training, and (3) a more vigorous assessment of the suitability of military lands for HLZ-26 and proposed future HLZs, including those issues outlined above.

2.2. Air Force and Forest Service Response

- Regarding suitability of military land, Response PN-9 on Page A-28 of the Final EA states that "Based on AF and FS comments and review of public comments, the suitability analysis discussion was revised to be more detailed. It will be part of the permit application. To date the AF and FS consensus is not to include it in the EA."
- In the Air Force Draft Decision, Page 6 it states: "FINDING OF NO PRACTICABLE ALTERNATIVE: Pursuant to Executive Order 11988, and considering all supporting information, I find that there is no practicable alternative to military training within floodplains located within the Mt. Taylor RD (Zuni Mountains Unit), Sandia RD, and Magdalena RD, as described in the Proposed Action and Alternative 1 in the attached EA."
- On Page 1-1, in describing the section "Comparison of Alternatives," the Final EA states: "These alternatives were developed based on substantial issues raised by the public and other agencies. This discussion also includes possible design features to reduce potential impacts."
- Section 2.2.2: Proposed Action in the Final EA is the same as the Proposed Action in the Draft EA 2013 with the exception of mentioning sites for camping in the Magdalena RD and a reducing of the total number of aircraft sorties and events.
- Section 2.2.3: Alternative 1, is the same as in the Draft EA 2013.

2.3. Inadequacy of Response

- There is no discussion of the suitability of military land for this training anywhere in the Final EA. Response PN-9 on Page A-28 is confusing. Does it mean that a new Suitability Analysis has been performed since October 2014? The version made available at that time contained no information that was not already available in the Draft EA 2013.
- The assertion contained in the Air Force Draft Decision that there is no practical alternative to conducting this training in the Cibola is unsupported by analysis or data. All my previous comments remain relevant.
- The statement that the alternatives were developed based on substantial issues raised by the public is false. The Alternatives presented in the Final EA are the same as in the Draft EA 2013. No changes have been made taking into account the vast majority of public comments.
- The Final EA scales down the number of aircraft sorties and events at the HLZs by approximately a factor of 4 from those proposed in the Draft EA 2013, yet fails to

mention this significant change in Section 1.7 (Pg. 1-5) "Changes since the Issuance of the Draft EA." At the most, the number of Sorties on an average busy day would increase by about 18% according to the numbers presented in Table 3.2.2-2. The obvious question is why quadruple the number of HLZs when the number of aircraft sorties increases by less than 20%? No reason is provided in the Final EA.

- The statement that No Fly Zones will be established over all private inholdings in the National Forest is false, as demonstrated by Figure 3.2.2-1 on page 3-20 which shows flight paths directly over my property and other inholdings on the east side of the Bear Mountains. No changes have been made in this figure as compared to the same figure in the Draft EA of 2013 (Figure 4-1 on Page 4-4).
- The statement that Kangaroo Rat mounds will be avoided where possible is not credible. For example, Figure 2-3 on page 2-7 shows that up to three military vehicles will be allowed on the first half mile of 354Q, which is the track to my inholding. As noted above, there are many Kangaroo Rat mounds along this track, many of which have been destroyed by military vehicles. There are no turn-offs on this track, so vehicles create extensive damage to the terrain when they turn around.
- Riparian areas (e.g., Baca and Las Cabras Canyons) are not excluded from military vehicles (Figure 2-3 on page 2-7).
- Despite requests from landowners, no buffer at all is established around most inholdings, and a buffer of $\frac{1}{4}$ mile around property is inadequate.

2.4. Suggestions for Resolution

The EA should provide 2 additional alternatives:

- Alternative 2: Relocate the training to military land,
- Alternative 3: Reduce the level of training below that of Alternative 1, including fewer helicopter overflights and sorties and no new HLZs.

The EA should revise the Proposed Action and Alternative 1:

- Revise the Proposed Action to eliminate the construction of new HLZs.
- Revise the Proposed Action and Alternative 1 to:
 - remove training from sensitive riparian areas,
 - move the tactics training area so that it does not enclose private property and provides a buffer of 5 miles from private property, and
 - propose different flight paths that avoid private property and residences by 5 miles and propose different locations for the HLZs to accommodate these different flight paths.

3. The Final EA does not adequately assess impacts of training on wildlife and humans and fails to provide a convincing rationale for not conducting an EIS.

3.1. Comments on Draft EA

3.1.1. Attachment A, August 20, 2013 / Commentator C-1

- Request to conduct an independent Environmental Impact Statement (EIS) for the “Proposed Action” and “Alternative 1. This is justified both by intense level of the military’s activities, and by the proximity to the Bear Mountains in the Magdalena RD and Sierra Ladrones Wilderness Study Area.”

3.1.2. Attachment B, November 22, 2013 / Commentator F-1

- An EIS is needed to address potential impacts and public concerns, including cumulative impacts on wildlife, livestock and humans from chronic noise exposure and impacts to public safety.

3.1.3. Attachment C: Dec. 20, 2013 and Feb. 3, 2014 / Commentator C-53 and C-57

- Attachment C documents damage from military training and the disturbance of helicopter overflights.

3.2. Air Force and Forest Service Response

Need for an EIS

- Response NE-6 in Appendix A, Page A-38 states that both the Forest Service and the Air Force have followed regulations regarding the need for an EIS.
- The Forest Service Draft Decision (Page 5) states that “I have determined that implementation of the Proposed Actionwill not significantly affect the quality of the human environment. Therefore, an Environmental Impact Statement (EIS) is not needed.” Support for this statement provided in the Draft Decision includes assertions that the impacts on the health and safety of students and pilots are negligible, that the effects on the human environment are not likely to be controversial, that critical habitat will not be adversely affected.

Evaluation of Impacts

- Section 2.2.4: lists several measures to reduce impacts, including establishing no fly zones over all private inholdings and (possibly) private property. It also mentions avoidance of kangaroo rat mounds.
- Page 3-114 lists noise impacts of HLZs Management Indicator Species, including Juniper Titmouse (likely to be displaced displacement from adjacent habitat), Mule Deer and Elk (habituation to noise likely to occur, with no impact on populations).
- Table 3.6.2-4 and the associated text lists impacts on Sensitive Species near HLZ 26. The EA states that the environment created by the HLZs is incompatible with use by the following species and that they have likely been displaced already due to high levels of noise: Gray Vireo, Gunnison’s Prairie Dog, Banner Tail Kangaroo Rat, and

White Mountains Ground Squirrel. This same analysis is then repeated for each of the proposed new HLZs.

- Tables 3.6.2-10 – 3.6.2-13 and associated text (Pages 3-135 - 3-143) describe “no impact” of Navigation Training and Base Camps on a range of sensitive species.
- The analysis of noise impacts of aircraft (See Page 3-36 – 3-43 in Final EA) is provided for helicopter drop zones, but the maps in Figures 3.2.2-1 – 3.2.2-5 do not show the underlying map.

3.3. Inadequacy of Response

Need for an EIS

- The Draft Decision mentions effects on health and safety of students and pilots. It says nothing about the impacts of chronic noise exposure on residents of the area and wildlife. Nor does it refer to the large number of public comments (including a video) documenting significant impact on local residents.

Evaluation of Impacts

- The Forest Supervisor’s conclusion that construction of 3 new HLZs will have no significant impact on wildlife is contradicted by the Air Force’s own statements about the existing impacts due to HLZ-26.
- There is inadequate discussion about the impacts of noise on wildlife and people living under the ground tracks of the overflights.
- The statements about habituation of elk and deer to noise is speculative and relies on outdated research mostly from the 1980s and 1990s.
- The statement that navigational training will not impact Banner Tail Kangaroo Rats contradicts my experience of Kangaroo Rat mounds flattened by military vehicles.
- The Figures showing noise contours for each Helicopter Drop Zone (Figures 3.3.2-1 – 3.3.2-5) do not show the map data needed for public evaluation.
- Insufficient information is provided about the locations of the Base Camps, making it impossible to assess the accuracy of the environmental assessment.

3.4. Suggestions for Resolution

- The Forest Service should acknowledge the significant impacts of military training on wildlife and humans and reconsider the decision not to conduct an EIS.
- The EA and the Draft Decision should be revised to include:
 - Documented impacts of noise on local residents,
 - Documented impacts of land-based training on humans and,
 - Analysis of the impacts of noise on wildlife and humans based on current scientific research (references provided on request),
 - Figures 3.2.2-1 through 3.2.2-5 that show the underlying map clearly
 - Maps clearly indicating the locations of North, South, and Alternative Basecamps.

4. The Final EA Presents inconsistent, inaccurate, and incomplete information about training activities, including cumulative impacts of other military activity.

4.1. Comments on Draft EA, Air Force Field Trips, and Correspondence

4.1.1. Attachment A, August 20, 2013 / Commentator C-1

- Section IV of this document provides numerous examples of incomplete, inaccurate, and misleading information (see pages 11 – 21). Most of these comments continue to be relevant to the Final EA.

4.1.2. Attachment C: Dec. 20, 2013 and Feb. 3, 2014 / Commentator C-53 and C-57

- “The meeting in Magdalena on November 22, 2013 demonstrated that neither the Air Force nor the Forest Service understand what the military is doing currently in the Magdalena RD.... Neither the Air Force nor the Forest Service was able to describe the full range of other military activities in the Cibola.”
- Request “Accurate description of existing and proposed military activities in the Magdalena Ranger District, including actual numbers of existing and proposed helicopter overflights and numbers and types of rounds fired annually..”
- “Request Summary of all other military activities being conducted in or near the Magdalena RD.”

4.1.3. Attachment D: Correspondence with Elaine Kohrman Regarding Air Force Field Trips, April 15 and July 1, 2014

- “Neither the Air Force nor the Forest Service was able to account for all the land-based activities that occur in the area. In fact, when discussing previous incidents AF representatives frequently stated “that must have been some other group,” and Dennis Aldridge alluded several times to ground based training by groups from Colorado or Arizona, without being able to specifically say who they were.”
- “We don’t yet have accurate information about either the number of existing flights (sorties) or the number proposed. We have been told that the number of flights quoted in the EA was a worst-case scenario (2,946 sorties per year at the existing landing zone and 4,378 proposed after construction of 3 new HLZs). When asked about actual numbers on the field trip, Col. Andreasen stated that there would be no more than 300 – 400 flights per year under the proposed action. Both of these statements are inconsistent with the prepared Q&A provided by the Air Force (Q7/A7), which states that the site we visited has about 100 sorties (flights) per year and that this total number will not increase even after three additional HLZs are constructed: each site would then only see about 25 flights per year.”
- “Request that the Forest Service provide information about all permits issued by the Magdalena RD (including single day permits) for military training.”
- We request that the Forest Service “provide accurate information about all ground-based military activities in the Magdalena Ranger District (ongoing and over the past 5 years) to account for the acknowledged evidence of military activities unknown to

the PJs or the 58th Airborne. The public has a right to this information. If the Forest Service currently does not have access to this kind of basic usage information there should be a requirement for it (and penalties for non-providers) in any future agreement.”

- Provide accurate information about all other overflights in the Bear Mountains and the surrounding area, including along the Rio Salado. We understand that the FAA is the responsible agency for flights that do not touch ground, but we feel that the Forest Service needs this information in order to evaluate the cumulative impact of the proposed action combined with other activities.

4.1.4. Attachment E, October 2014, Correspondence with Elaine Kohrman regarding Air Force's "Suitability Assessment"

- “We request that USFS and USAF address the deficiencies in the “Suitability Assessment” as pointed out above. In particular we request: (1) information about the total budget for PJ/CRO training in the Cibola and the current costs of training in the Magdalena Ranger District, so that the impact of the incremental costs of moving these activities can be judged, (2) evidence that 15,000 acres within the WSMR’s more than 2,000,000 acres are not available for ground-based training, and (3) a more vigorous assessment of the suitability of military lands for HLZ-26 and proposed future HLZs, including those issues outlined above.”

4.2. Air Force and Forest Service Response

- The Draft Decision states: “The USAF has concluded that no significant adverse cumulative impacts would result from activities associated with implementation of the Proposed Action when considered with past, present, or reasonably foreseeable future projects in the Region of Influence. Potential cumulative effects would include a slight potential for cumulative noise impacts on the MSO and other Management Indicator Species (MIS) and Forest Service Regional Forester Sensitive Species from flight activity.”
- Table 3.2.1-1 “Baseline Conditions: 58 SOW Training” on Page 3-10 is unchanged from the 2013 version and shows
 - 17/2,974 Sorties (Average Training Day/Year), and
 - 97/17,814 Total Events (Average Busy Day / Annual).
- Table 3.2.2-2 “Proposed Action: 58 SOW Training” on Page 3-18 shows
 - 16.5/2,922 Sorties (Average Training Day/Year), and
 - 91.5 / 17,502 Total Events (Average Busy Day / Annual).
- On Page 3-19, the Final EA states: “The total events in Magdalena RD will increase from 97 per average busy day to 124 and from 17,784 per average busy year to 24,024,” which contradicts the totals in Table 3.2.2-2.
- Chapter 4 of the Final EA mentions that the 27th Special Operation Wing also uses airspace over New Mexico. Figure 4-1 shows Military Airspace Use in New Mexico. There is no discussion at all of land-based training by other groups.

4.3. Inadequacy of Response

- The Forest Service has not independently evaluated USAF claims of “no significant adverse cumulative impacts” and provides no evidence in support of the claim.
- Table 3.2.2-2 presents conflicting data for the activity at the 4 HLZs + the Cunningham DZ. If the numbers in the columns are actually added correctly (rather than using the “totals” listed for each HLZ), the “Proposed Action: 58 SOW Training” on Page 3-18 would show
 - 20 / 3,858 Sorties per Average Training Day/Year, and
 - 115 / 23,118 Total Events (Average Busy Day / Annual).
- The statement “The total events in Magdalena RD will increase from 97 per average busy day to 124 and from 17,784 per average busy year to 24,024” is inconsistent with any of these numbers.
- Taking the numbers sited above as correct, it is unclear why the number of sorties per average busy day increases 18% ($100*(20-17)/17$), whereas the number of sorties per average busy year increases 30% ($100*(3858-2974)/2974$). The corresponding increases for Events are 19% and 30%.
- Chapter 4 does not provide enough information about the additional aircraft activity to evaluate the cumulative impact of noise and disturbance on the area east of the Bear Mountains. It does not provide the information requested multiple times both in public comments and in subsequent correspondence. It is impossible to assess the impact of activities in Alternative 1 and the Proposed Action independently of these other activities.
- There is no discussion of additional land-based military training by other groups. There has been no response to requests for this information. The Forest Service has not shared copies of permits for other military training.

4.4. Suggestions for Resolution

- The numbers in Table 3.2.2-2 need to be corrected so that they are internally consistent. In addition, there should be a “Total” row that sums the numbers for all HLZs.
- The statements regarding increases in total events in the Magdalena RD should be revised to be consistent with the corrected table.
- An accurate accounting of all military activity (land-based and aircraft) in the Magdalena RD should be provided. While the Forest Service does not provide oversight of aircraft overflight activity if they do not land, their impact adds to the impact of Alternative 1 and the Proposed Action and must be accounted for.
- The EA should be revised to re-evaluate impacts, taking these activities into account.

5. The Final EA ignores all proposals for protecting local residents from the impacts of training.

5.1. Comments on Draft EA

5.1.1. Attachment A, August 20, 2013 / Commentator C-1

- On a personal level, I request that the current basecamp for PJ training be moved so that it is out of sight of my property and that pyrotechnics and other war-simulation training be similarly relocated. In general I suggest that if continued training is allowed, criteria for locating basecamps and land-based training should preclude their being located within 5 miles of residences.
- For a full list of detailed comments challenging claims that the military will follow all the rules, see Page 8 of this document.

5.1.2. Attachment B, November 22, 2013 / Commentator F-1

We request the following changes in ongoing operations:

- Vehicular traffic on roads not designated on official Forest Service maps (including tracks off 354) should cease.
- The existing Tactics Training and Field Training Exercise areas should be moved so they do not include private property. Base camps and high-noise training and pyrotechnics should not be visible from or occur within 5 miles of residences.
- Aircraft ground tracks should avoid private residences by at least 5 miles and altitude levels should be strictly monitored.

5.1.3. Attachment C: Dec. 20, 2013 and Feb. 3, 2014 / Commentator C-53 and C-57

- Attachment C documents damage from military training and the disturbance of helicopter overflights to local residents. It repeats previous requests for moving the tactics training area and base camps as well as rerouting aircraft to avoid my residence.
- It also requests that the track into my property (354 Q) be closed to use by military vehicles as keeping this half-mile track open is highly destructive to the environment as vehicles must turn around by driving over open land.

5.1.4. Attachment D: Correspondence with Elaine Kohrman Regarding Air Force Field Trips, April 15 and July 1, 2014

- We respectfully request that helicopter training (day and night) within 5 miles of houses and other populated areas be discontinued.

5.1.5. Attachment F, July 2015, Resolution of Objections to Magdalena RD TMP

This attachment documents the decision of the Forest Service to designate 354Q, the track into my property, as "Restricted to Administrative Use Only" on the new motor vehicle use map (MVUM).

5.2. Air Force and Forest Service Response

Location of Tactical Training Area

- Figure 2-3 on Page 3-7 of the Final EA describes the locations of land navigation training and existing and new HLZs. It is the same as in the Draft EA 2013.
- Response MI-7: “This road [354Q, the track to my property] is a system road, the USFS does not allow [its closure].”

Helicopter Ground Tracks

- On Page 2-18, the EA states “No Fly Zones” will be established over all private land inholdings with the boundaries of the Cibola NF.”
- Figures 3.2.1-4 and 3.2.2-1 show the Aircraft Ground Tracks associated with the Baseline (Alternative 1) and the Proposed Action. They are the same as in the Draft EA 2013 and directly over fly private inholdings.

Location of Base Camps

- On Page 2-8, the EA states “A new base camp area is proposed under the Proposed Action as the authorized base camp area has problems with radio reception for coordination of training activities. The new base camp area (South Base Camp Site) would be accessed from NFSR 354 via an unnumbered road heading west. The new base camp area would consist of a main camp with small team camps approximately 450 to 600 feet away from the main camp, 150 to 200 encompass approximately 40.5 acres on the north side of the unnumbered road. A third potential base camp has been evaluated should use of the proposed South Base Camp Site become problematic. This base camp area would be accessed from NFSR 354 via NSFR 354N heading west. The size and layout of this camp would be the same as described above.”
- Response GE-5 (Page A-17): Alternate base camp locations have been assessed and will be part of the FS decision on the special use permit. The FS and AF have worked together to minimize impacts to landowners and will continue to do so.
- Response GE-6 (Page A-17): Changing logistical and safety requirements have resulted in changed parameters for acceptable base camps. Alternate base camp locations have been assessed and will be part of the FS decision on the special use permit. The FS and AF have worked together to minimize impacts to landowners and will continue to do so.
- Response PA-3, Page A-30: The old base camp was sighted in a previously disturbed area (or informal existing campsites) as stated in the EA. The Air Force and Forest Service worked together to determine the best locations for the base camps and drop/landing zones. The proposed sites provided safety for both civilian and military personnel and allowed for communication across the terrain for military personnel. The proposed base camp was moved closer to the landing zone to improve both safety and enable communication.

- Response MI-5 (Page A-77): The 2013 Draft EA did not specifically discuss the sites used for camping in the Magdalena Ranger District. The current camping sites and the access routes are discussed in greater detail in the Final EA.

5.3. Inadequacy of Response

Location of Tactical Training Area

- No response is provided to numerous requests to move the tactical training area so that it does not enclose private property.
- The statement that 354Q is a system road and cannot be closed to traffic is contradicted by the new MVUM and the agreement with the Regional Forester.

Helicopter Ground Tracks

- The claim that no-fly zones will be established over inholdings (Page 2-18) is contradicted by maps in Figures 3.2.1-4 and 3.2.2-1.

Location of Base Camps

- The description of the location of base camps is vague. The location of base camps should be clearly designated on maps.
- Based on personal experience, I note that the PJ/CRO training has moved its basecamp to the location within sight of my residence for the last several years prior to the Draft Decision having been finalized.
- The Air Force and Forest Service have never contacted me to try to minimize impacts, despite years of requesting change. The impact due to the basecamp has increased.
- The explanation for moving the base camp to allow better cell phone communication is not consistent with the need to do training in a realistic environment. If the main reason for using the Magdalena RD for this training is to emulate conditions in Afghanistan or elsewhere, lack of cell phone connection should not be problematic. GPS communication devices such as the Garmin InReach are readily available and more likely to simulate real life conditions. They also allow much better communication among team members, headquarters, and with emergency services than either satellite phones or cell phones.

5.4. Suggestions for Resolution

The Final EA should revise the Proposed Action and Alternative 1:

- Relocate the tactics training area (including base camps) so that it does not enclose private property.
- Provide a 5-mile buffer between the tactical training area and private property.
- Propose different flight paths that avoid private property and residences by 5 miles.
- Propose different locations for the HLZs to accommodate these different flight paths.

6. Failure to describe a credible approach to monitoring military compliance with requirements

6.1. Comments on Draft EA

6.1.1. Attachment A, August 20, 2013 / Commentator C-1

- The Forest Service seems to provide no oversight for military operations on public land. Has the Forest Service monitored compliance of military actions with military policy? If not, why? Examples include: Leaving trash from navigational aids on private and public land, lower than stated over-flights of private residences, destruction of wildlife habitat (e.g., Bannertail Kangaroo Rat) through off-road driving, routinely driving on roads not designated on National Forest Service maps, and trespassing on private property.
- "...the Forest Service should establish an independent and effective means of monitoring to assure compliance."
- For a full list of detailed comments challenging claims that the military will follow all the rules, see Page 8 of this document.

6.1.2. Attachment B, November 22, 2013 / Commentator F-1

- "The Forest Service should monitor Air Force compliance with existing rules and regulations."
- Aircraft ground tracks should avoid private residences by at least 5 miles and altitude levels should be strictly monitored.

6.1.3. Attachment C: Dec. 20, 2013 and Feb. 3, 2014 / Commentator C-53 and C-57

- "The Forest Service should monitor Air Force compliance with existing permits and regulations."

6.2. Air Force and Forest Service Response

- The Final EA does not address how the Forest Service will monitor compliance, except in some entries in Appendix A, which are listed below.
 - Response Number GE-4 on Page A-17: "The USFS monitors all special use permit holder activity. Inspections are scheduled following exercises to allow compliance to be monitored."
 - Response PA-4 on Page A-30: "...The military unit will contact the Ranger District ...to coordinate a site inspection prior to the unit leaving the field. If the Ranger District cannot accommodate the inspection request, it is the military's responsibility to leave areas in an acceptable manner."
 - Response MI-1 on Page A-76: "Some of the issues discussed are included in the permit conditions, not the EA."

6.3. Inadequacy of Response

- Based on my own experience and that of others, the Forest Service has not monitored compliance with conditions set out in the permit. The basecamp has moved, helicopters continue to fly directly above my residence at low altitude, and military personnel do not remember the agreements made with their predecessors in 2014. Complaints have gone unaddressed.
- The responses in EA imply the Air Force will most likely monitor its own compliance. Personal experience in talking to personnel taking part in the training (officers and cadets) is that they are unaware of many rules.
- There is no discussion (even in Appendix A) of ways to monitor compliance with rules governing aircraft flight paths or the numbers of sorties and events taking place.

6.4. Suggestions for Resolution

- Previous suggestions remain relevant: The Forest Service should establish an independent and effective means of monitoring all military activity in the Cibola National Forest to assure compliance with the conditions of the permit.
- The Forest Service should provide records of previous inspections / monitoring of military activities.

Attachment A

Comments on:

“Draft Environmental Assessment Military Training Exercises within the Cibola National Forest
near Kirtland Air Force Base, New Mexico”

August 20, 2013

August 20, 2013

Ms. Cheryl Prewitt
Cibola National Forest
U.S. Forest Service
2113 Osuna Rd., NE, Ste. A
Albuquerque, NM 87113

Dear Ms. Prewitt:

Thank you for the opportunity to submit comments in response to the Draft Environmental Assessment of Military Training Exercises within the Cibola National Forest near Kirtland Air Force Base, New Mexico.

I understand and support the need for training pilots and soldiers to combat terrorism abroad. However, I am very concerned about the impact of this training on both the environment and on local residents and question the appropriateness of such activities for public land. The Department of Defense controls nearly 5,500 square miles of land in New Mexico, and should be responsible for identifying military land suitable for this important mission.

I own 160 acres and a residence about 15 miles north of [REDACTED] on an inholding of the Cibola National Force. As I read the Draft EA I realized that my property is also completely enclosed by the "tactics training area" for ground-based training. I have significant on-the-ground experience in the area, having observed military activities close up for the last 17 years. This has also given me much cause for concern, both about compliance of the military with its own policies and about oversight of these activities by the Forest Service.

The attached document provides detailed comments on the Draft EA, raises a number of questions, and makes suggestions for addressing concerns.

Thank you again for the opportunity to comment. Please feel free to contact me with any questions or concerns.

Sincerely,



Arian Pregenzer



Comments on:

“Draft Environmental Assessment

Military Training Exercises within the

Cibola National Forest near Kirtland Air

Force Base, New Mexico”

August 20, 2013

Arian Pregenzer

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I. Introduction

I am a fifth generation New Mexican who has hiked and camped in the Cibola National Forest for over 40 years. I have always been drawn to the wildness of the Bear Mountains, and have spent many days exploring their summits, canyons and drainages. I own 160 acres with a residence on an inholding of the Cibola National Forest in the Magdalena Ranger District (Magdalena RD) about 15 miles north of Magdalena. Since I acquired this land in 1996 I have been concerned about military use of the National Forest and made many inquiries at the Magdalena RD, including complaining about the military trespassing on my land. I also brought these issues to the attention of officials at Kirtland AFB. Despite assurances from the Magdalena RD that I would be informed of activities affecting the Cibola near the Bear Mountains and my property, I was never contacted about the proposal under review here. Indeed, I found out about it by accident in February 2013 when I complained about the proximity of military ground training to my property, in particular the relocation of a training base camp to within sight of my house.

As a retired Senior Scientist from Sandia National Laboratories with a long history of working with the National Nuclear Security Administration, the Department of Defense, and the Department of State on ways to reduce the risks of nuclear proliferation and terrorism, I understand and support the need for training pilots and soldiers to combat terrorism abroad. However, the Department of Defense controls nearly 5,500 square miles of land in New Mexico, and should be responsible for identifying military land suitable for this important mission. I feel that it is inappropriate to conduct such training on public land.

The Bear Mountains and immediate environs are the places most affected by the activities described in the Environmental Assessment (EA), including low-flying aircraft, helicopter landing zones (HZLs) and ground-based training. The Bear Mountains are the site of two inventoried roadless areas, and are an island of critical habitat, disconnected from other mountain ranges in the Cibola. Both the Proposed Action and Alternative 1 (continuing the existing level of training) represent very significant ongoing impacts to these public lands, which I believe warrants a full Environmental Impact Statement (EIS) conducted by an independent organization. I'm also concerned that the National Environmental Policy Act (NEPA) process does not seem to have been followed during the more than 20 years of military use of the Cibola.

I am particularly disturbed by the lack of scientific evidence supporting many of the conclusions of the EA, by the short time allocated for reviewing the complex and lengthy document, and by the lack of proactive effort to seek public comment. After more than 60 hours studying and commenting on Volume 1 of the EA, I have not yet had time to assess the material in Volume 2. Public meetings should have been held in locations near the training sites both to educate the public and to solicit their views.

Of the alternatives presented in the EA, I am strongly in favor of the No Action Alternative – ceasing military training on Cibola National Forest land. In my opinion, the level of military training under both "Alternative 1" and the "Proposed Action" contradicts the mission of the U.S. National Forest, which is "to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations."

II. Summary of Comments and Questions

This section provides a high level summary of comments and questions. Detailed comments and questions are presented in Section IV. Time constraints prevented thorough cross-referencing.

1. The Bear Mountains are the site of two inventoried roadless areas, and are an island of critical habitat for wildlife, disconnected from other mountain ranges in the Cibola. Both the Proposed Action and Alternative 1 (continuing the existing level of training) represent very significant ongoing impacts to these public lands. Although military activities have been ongoing for more than 20 years, there seems to have been no previous formal assessment of environmental impact. The process for issuing permits seems to have been very casual. Is this the first time that the NEPA process has been utilized? If so, why was it not used earlier?
2. The level of military training under both "Alternative 1" and the "Proposed Action" seems incompatible with the mission of the U.S. National Forest, which is "to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations." This level of training would be far more appropriate for military land, of which there are nearly 5,500 square miles in New Mexico. Why has the forest service not asked the military to evaluate the suitability of military land? What criteria have the Forest Service used to determine the suitability of public land for military training?
3. The military's criteria for site selection are flawed and limited. The first two selection criteria are essentially the same and can be summarized as "do not increase transportation costs from Kirtland AFB." These double-weighted criteria, coupled with the failure to evaluate the suitability of military land, foreclose any options other than continued use of the Cibola. Why have these selection criteria been accepted by the Forest Service? What criteria have the Forest Service used in evaluating the proposed sites?
4. There seem to have been no long-term studies of the effects on vegetation, wildlife, and soil of military use of the Cibola over the last 20 or more years. This means that there is no scientific basis for making decisions about continuing or expanding these activities. Nor has there been a systematic effort to evaluate the impacts of training on the quality of life of local residents, or on property values near training locations. Has the Forest Service conducted such studies? If not, what is the reason?
5. The public has not been adequately informed or included in the decision making process to date. Decisions seem to be based on expediency to the military and on personal preferences of local Forest Service officials. In addition, the EA is very long and complex and would be intimidating to many people. Among those I contacted in Magdalena the week of August 13, none were aware of the proposal or the opportunity to comment. Has the Forest Service made any attempts to educate the public or to gather their input? Why has it not held public meetings or been proactive in seeking public input? Of particular interest to local residents and recreational users are decisions about:

- a. Expanding the number of military organizations that use the area for training, the number of training events, and the types of aircraft (e.g., Ospreys) using the area.
 - b. Expanding the area on the ground that will be subject to helicopter overflights.
 - c. Locating training zones and base camps near private property.
 - d. Evaluating the impact of noise on well-being.
 - e. Dealing with fire hazards of pyrotechnics and other material / equipment used during training.
6. The EA provided by the military is incomplete and inadequate (see documentation in Section IV, including summary comments on Table 2-11 and extensive comments on relevant sections in Chapters 3 and 4). Why has the Forest Service not required a more scientific approach to assessing environmental impacts? Of particular concern are:
 - a. Failure to analyze military land in NM or elsewhere as a suitable location for training.
 - b. Misleading use of statistics to downplay impact of noise and ground-based activities.
 - c. Misleading presentation of data to downplay impacts.
 - d. Inadequate data bases of biological resources (e.g., vegetation).
 - e. Inappropriate standards for evaluating impact of noise in a wilderness-like setting (e.g., comparing noise levels to that found in urban environments).
 - f. Reliance on models to estimate noise levels, without using accurate flight paths or validating with on-the-ground measurements.
 - g. Lack of scientific evidence provided to support conclusions of minimal impact of ground based training on soil, vegetation, and wildlife habitat, or on inventoried roadless areas.
 - h. Lack of data to support claims of minimal impact on quality of life of local residents.
 - i. Lack of consideration of impact to property values near training sites.
7. The Forest Service seems to provide no oversight for military operations on public land. Has the Forest Service monitored compliance of military actions with military policy? If not, why? Examples include:
 - a. Leaving trash from navigational aids on private and public land.
 - b. Lower than stated over-flights of private residences.
 - c. Destruction of wildlife habitat (e.g., Bannertail Kangaroo Rat) through off-road driving.
 - d. Routinely driving on roads not designated on National Forest Service maps.
 - e. Trespassing on private property.
8. Military permits seem to be issued on a very casual basis, without adequate review. For example, the location of the PJ base camp was moved to within sight of my residence in November 2012 after having been located elsewhere for more than a decade. Pyrotechnics are now conducted very close to my property. Moreover, while reading the EA I discovered that my property is completely enclosed in the tactics training area, which may explain why the military frequently trespass on and litter my land. Why was I neither consulted nor informed of changes to the base camp location or of the existence of a tactical training area that enclosed my property?

III. Suggestions for Addressing Concerns

This section offers suggestions for addressing the concerns summarized in Section II. Their numbers correspond to those in Section II.

1. Conduct an independent Environmental Impact Statement (EIS) for the "Proposed Action" and "Alternative 1." This is justified both by intense level of the military's activities, and by the proximity to the Bear Mountains in the Magdalena RD and Sierra Ladrones Wilderness Study Area.
2. Conduct a thorough analysis of the suitability of military lands in New Mexico and northern Texas for the training proposed on the Cibola. The analysis should include land in White Sands Missile Range, Kirtland Air Force Base, Holloman AFB, Cannon AFB, the Melrose bombing range, and Fort Bliss. The analysis should compare their characteristics to the proposed training locations in the Cibola, roadblocks to their being used for training purposes, and options for removing those roadblocks.
3. Develop a meaningful set of site selection criteria for site selection that include factors such as preferential use of military land in addition to the cost of travel from Kirtland AFB. In addition, develop a set of criteria to use in evaluating the suitability of Forest Service land for military training.
4. Develop a framework and plan for conducting long-term studies of the impact of military activities in the Cibola. This would include evidence-based analysis of impact on erosion, vegetation, and wildlife and would use data derived from the sites in question rather than extrapolated from studies conducted elsewhere. It would also include evidence-based analysis of the impact of military use of non-designated roads on expanding the use of these roads by others, impact on recreational use, impact on quality of life of local residents, and the impact on property values near training sites.
5. Proactively engage the public, especially in locations near training sites, on the scope of the existing and proposed activities. Conduct public meetings near training locations to inform citizens about the Air Force proposal in language that they will understand. Other means of public outreach could also be considered, such as notifications on television and radio. Public input from such extended outreach should be documented and given careful attention during the decision-making process.
6. In the absence of an independent full EIS to address the shortcomings of the EA, the Forest Service should not accept the existing EA as adequate, but request a new assessment by an objective, qualified, independent organization that addresses the shortcomings documented here.
7. In the near term, and if continued training is allowed, the Forest Service should establish an independent and effective means of monitoring to assure compliance.
8. On a personal level, I request that the current basecamp for PJ training be moved so that it is out of sight of my property and that pyrotechnics and other war-simulation training be similarly relocated. In general I suggest that if continued training is allowed, criteria for locating basecamps and land-based training should preclude their being located within 5 miles of residences.

IV. Detailed Comments and Questions

This section includes detailed comments on Volume 1 of the Environmental Assessment. Time constraints prevented removing redundancies and organizing comments according to categories. Time constraints also precluded a review of most supporting documents in Volume 2.

Chapter 1: Purpose of and Need for Action		
Page	Lines	Comment / Questions
1-1	34-38	This paragraph makes the implicit assumption that there are no suitable options for conducting this training on military land in NM or elsewhere. This is not justified. Indeed, there has been no evaluation of military land. From my discussions with officers involved in this training, I understand that they would prefer to train on military land. They acknowledge that White Sands Missile Range has all of the characteristics they would need. However, they cited difficulties in negotiating with other base commanders and even with the commander of Kirtland AFB to get access to these lands. Why is the onus not on the Department of Defense, rather than the Forest Service, to provide lands for training? I recommend an analysis of the suitability of military lands in New Mexico for the training proposed on the Cibola. The analysis should cover land in White Sands Missile Range, Kirtland Air Force Base, Holloman AFB, Cannon AFB, the Melrose bombing range, and Fort Bliss. The analysis should compare their characteristics to the proposed training locations in the Cibola, as well as roadblocks to their being used for training purposes, and options for removing those roadblocks. The unescorted public are not allowed on military reservations, why are routine, large scale military training exercises allowed on (and above) the National Forest? Military training by its very nature is noisy and It is not possible to satisfy the needs of both.
1-2	1-3	I challenge the claim that the Grants Corner site is inaccessible under winter conditions. What is the definition used for impassability? What percentage of time is the area impassable according to this definition? Are there times in winter when it is not impassable? Since this is just one training class, it should be possible to schedule it at a time when the area was accessible. Where is the data on weather conditions and scheduling constraints to support the claim of inaccessibility? Have alternative training schedules been analyzed? Furthermore, if realistic conditions are important, it would seem that training in difficult winter conditions would be essential to mission readiness.
1-2	4-5	I question whether the proposed new HLZ's provide more topographical variety than locations on military land in NM. What key characteristics distinguish it from White Sands Missile Range? What about locations on Fort Bliss?
1-2	6-8	White Sands Missile Range is even closer to Kirtland than the Magdalena RD. Why wasn't this location considered? What about Kirtland AFB itself as a location for PJ training?
1-4	25-28	Military training in non-USFS land (both private and land owned by the military) is relevant to the decision by the USFS because it provides information about other locations available for training. I think it would be highly relevant to this decision to understand the full scope of training (as well as possible training sites) on non-USFS land.

1-5	13	Why were citizens in affected areas not consulted during the scoping process? For example, I was neither notified nor consulted.
1-5	21-28	I echo the concerns of NMWS, especially as to the negative effects to visitor experience, on the use of OHV as establishing precedents for more extensive off-road vehicle use, and on the inefficient use of USFS resources. As a property owner with a house about 4 miles from the existing HLZ and about 1 mile from the PJ training site, I can testify to the deleterious effect of extensive helicopter overflights (both day and night), pyrotechnic activity during PJ training, off-road vehicle use (up the border of my property), and the sound of power generators. None of these activities is conducive to the use of the area by those seeking to experience nature in the Bear Mountains and adjacent lands.
1.5	37 - 40	<p>The Sierra Ladrones are indeed a sensitive Wilderness Study Area. Helicopter and other aircraft frequently fly quite low over this area, which definitely impact its wilderness qualities. In addition to the Ladrones, the Bear Mountains and surrounding hills, which provide a large part of the terrain of interest to training, are also home to mountain lions and other large fauna that are impacted by noise and increased activity. In fact, the Bear Mountains contain two inventoried roadless areas (IRAs): Scott Mesa and Goat Spring, and were considered a RARE II Roadless Area, which is suitable for wilderness designation. This status could be threatened as the military uses roads undesignated on official USFS maps. This contradicts the USFS goal of closing non-designated roads to reduce vehicle use in the National Forests.</p> <p>I strongly endorse the recommendation of the NMGF to analyze the impact on bighorn sheep in the Ladrones, and would recommend extending this analysis to the Bear Mountains.</p> <p>I also recommend an analysis of the impact of military use of non-designated roads on expanding use of these roads by others. Doesn't this contradict the USFS policy of closing non-designated roads.</p>
1-6	7-10	Is the Biological Assessment and Evaluation included as an Appendix? If not, why? It seems that this would be a critical part of the EA.

Chapter 2: Description of the Proposed Action and Alternatives

Page	Lines	Comments / Questions
2-1	16-24	Why was not military land considered to be a reasonable alternative?
2-2	2-10	The selection criteria are flawed and limited. The first two selection criteria are essentially the same: do not increase transportation costs from Kirtland AFB in the short term. These double-weighted criteria, coupled with the failure to amortize costs over time, foreclose any options other than continued use of the Cibola. If the military has been using this land for 20 years, it would be reasonable to expect costs to temporarily increase by moving the training to military or other locations. However, the costs over the long-run could be the same or even reduced. Has there been an analysis of the costs over 10 - 20 years of moving all training to military land in either New Mexico or elsewhere? I recommend an expanded set of selection criteria that would include a criterion to give priority to

		military land. There should be a thorough analysis of the costs over a 10 or 20 year period of moving training to a military reservation and using long-term cost as one criterion. In addition, I recommend that the Forest Service develop a set of criteria for evaluating suitability of forest lands for military training.
2-2	15 – 19	Which specific sites were considered in these states? It seems absurd that other states were considered given that the first two selection criteria preclude any site other than sites close to Kirtland AFB.
2-3	Table 2-1	Table 2-1 required no analysis, since the selection criteria effectively rule out training anywhere other than the current location. It is disingenuous to include.
2-3	14-15	These areas are all very close to my property and house as previously noted.
2-4	Fig. 2-1	HLZ-26 and the DZ require exercises and highly disruptive overflights of residences along the Rio Salado (Riley), property west of the Bears, my property. This will be much worse with HLZs-X,Y, and Z.
2-5	1-7	My experience with "resolving complaints" has been far from satisfactory. My concerns have been met with "there's nothing we can do" from the Magdalena RD, or "we are within our rights" from Kirtland AFB. I have little confidence that things will improve if the military is granted all that it wants.
2-5	8-12	The new base camp for the PJ/CRO and 4 th Recon is within sight of my house, and only about 1 mile away. This camp has been utilized only since November 2012, but demonstrates extensive flattening / disturbance of fragile vegetation and animal habitat. The sound of generators, pyrotechnics, and large numbers of vehicles is very disturbing. In addition, they have driven down the road to my property and made a mess as they turned large vehicles around off road. The increase in frequency and numbers will make this disturbance significantly worse. Prior to November 2012, the base camp was in Baca Canyon, which was significantly farther from my property, out of sight, and with minimal noise impact. Why was the base camp moved to the present location within sight of my house? If continued training is permitted, I suggest a thorough analysis of all possible sites for PJ base camps, with a criteria that they do not disturb flora and fauna, do not utilize roads not shown on official Forest Service maps, and that they cannot be seen or heard by local residents.
2-7	Table 2-2	This level of activity identified in the row "Tactics" on the Magdalena RD would be far more appropriate on military land. It makes a significant impact on the environment (degraded land, erosion, high noise levels, large numbers of soldiers, portable toilets). The location of the base camp is inaccurately described as being "near" the Magdalena RD. In fact, it is right in the middle of the Magdalena RD and within sight of my residence, as noted above.
2-8	4-6	<u>Redundant with Page 1-2. Same comment as on Page 1-2.</u> I challenge the claim that the Grants Corner site is inaccessible under winter conditions. What is the definition used for impassability? What percentage of time is the area impassable, according to this definition? Are there times in winter when it is not impassable? Since this is just one training class, it should be possible to schedule it at a time when the area was accessible. Where is the data on weather conditions and scheduling constraints to support the claim of inaccessibility? Have alternative training schedules been analyzed? Furthermore, if realistic conditions are important, it would seem that training in difficult winter conditions would be essential to mission readiness.

2-8	16-32	On numerous occasions military personnel doing navigational training with helicopter drop-offs have crossed my property and damaged my fence. In one occasion they actually cut my fence, leaving a decoy Arab head scarf nearby. Trainees do not have sufficient knowledge of private property boundaries and locations to behave appropriately. Training sites should be on military land, or at least well-removed from private property.
2-8	33-43	I challenge the claim that trash will be packed out. It isn't now. For example, the parachute navigational aids and canisters are all over my property – a big trash pickup problem.
2-9	14 -	As noted above, the location of the current training base camp is within sight of my house. These activities are highly disruptive. It is simply not possible to "leave no trace" when there are this many vehicles and personnel involved. I've surveyed the new base camp (after only two uses) and there is significant disturbance, which will be a magnet for other "heavy users".
2-9	33-41	The presence of pyrotechnics, grenades, and other ammunition constitutes a significant fire hazard. I question the reasonableness of allowing such activities on USFS land, and am particularly concerned at the proximity to my property. In late winter 2013, exercises were conducted in extreme drought conditions and during high winds. When I voiced my concern to the Magdalena RD, I was advised to contact to the Socorro County Fire Marshall. I left multiple messages on the phone number provided, but they were never returned or even acknowledged. How can property owners (as well as citizens concerned about public lands) make sure that their concerns about fire are taken seriously? Who is accountable if something gets out of control?
2-10	1-7	I challenge the claim that vehicles will drive only on designated roads and never off-road. The track to the current base camp is not a designated road on Forest Service maps. Prior to its use by the military, it was a small track used occasionally by ranchers to maintain their fences. Since November 2012 it has become a very clear road. The camp spot is large and flattened. The move of the base camp to the current location directly contradicts FS practice of closing roads, especially near inventoried roadless areas. In addition, since medical emergencies are more likely as the numbers of training classes and personnel increase, chances of off-road use during medical emergencies will also increase.
2-10	Table 2-3	Note the numbers of munitions, flares, etc. This constitutes a huge impact on the environment. Such training would be much more appropriate on military land. It also illustrates why I'm disturbed at having these training activities taking place within sight / hearing of my house. What is the justification for conducting such training so close to a private residence?
2-11	10-24	The helicopter and aircraft traffic to drop off students goes directly over my property. The drop zones themselves are within sight of my property. These activities are very disruptive. As already mentioned, there have been numerous instances where trainees crossed my property. What is the justification for establishing landing zones that require overflights of a private residence and exercises that result in trainees crossing private property?
2-15	Fig. 2-4	My property is shown on this map: it is the cross-hatched area directly north of HLZ/26. Why are the HLZs and training areas not located on Kirtland AFB or on other military land?

2-18	Fig. 2-7	This is the first time I've seen such a map and realized that my property is completely enclosed in the "Tactics Training" area. How can this be justified? I have the only residence between Magdalena and Riley within a mile of Road 354. Why have I not been consulted about these plans? In addition, military training will directly impact the RARE II status of the area, as they are currently driving on tracks not considered "roads" by the forest service. This includes the track leading to my property, which is shown on this map as 354O. This designation is not accurate. Other tracks that do not meet the criterion of a road are 345U, 354X. I challenge the designation of these tracks as roads.
2-19		This proposed increase in operations, including 3 additional landing zones, directly impacts the quality of life near the Bear Mountains for wildlife, recreational users, and local residents. Even existing levels are highly disturbing, with helicopters flying so low over my house that the windows rattle.
2-20,21		The intense level of training described here seems incompatible with non-military land. Are there precedents elsewhere in the United States for such intensive training on public land? What precludes such activities on military land in NM or elsewhere?
2-22,23	Table 2-7	Note that the annual number of sorties per year in the Magdalena RD is projected to be 4,378, including 26,238 events such as hovers, touch and go landings, closed patterns, or airdrops of personnel. Each one of these events is exceedingly loud even at 5 miles from the landing zones. The "closed patterns" include overflights of the Bears, private property, and cattle grazing operations. This level of noise and other activity is incompatible with recreational use of the Bear Mountain area, and surely impacts wildlife and ranching operations. It also destroys the peacefulness of my home and property.
2-25,26		USMC activity is much the same as that of the PJs and aircraft operations, with similar adverse effects. It also illustrates the propensity for increasing the use of the Cibola by other military organizations.
2-29	Tab. 2-10	This table illustrates the magnitude of activity under existing conditions (described as Alternative 1). Has the Forest Service studied the impact of these operations over the last 20 years? If not, I recommend that such studies be initiated. Has the military made efforts to relocate to military land? If not, why?
2-30-32		This section fails to mention that the Cibola is in the process of revising its Management Plan. My understanding is that this process will take place in the next 2-3 years. It would be logical to include the general issue of Military Use of the Cibola in this planning process. Why cannot the decision on this proposal be delayed until the new plan is complete?
2-37-40	Tab. 2-11	This table summarizes results of the next two chapters. Have there been on-the-ground studies of the impact of military activities in the Cibola over the last 20 years? Without such studies many of the claims in Table 2-11 have no scientific basis. I question the methods used to arrive at most of the assertions of this table. Here I provide high-level comments, with more detailed comments in relevant sections in Chapters 3 and 4.
2-37	Tab. 2-11	Noise: The claims about levels of noise and its impact are based on models that use notional flight patterns and are not validated by on the ground measurements. To assess impact, noise levels have been compared <u>inappropriately</u> to urban and industrial environments. Statistics are

		inappropriately used to suggest a very small spatial and temporal impact. No public input has been included.
2-37	Tab. 2-11	Earth Resources: The claims regarding disturbance to soil from vehicles and base camp operations under the proposed action are simply false. The area of the current basecamp is flattened and bare. Vehicles routinely drive off-road if they need to turn around. These disturbances have significant long-term effects on the environment, including erosion. Again, statistics are used misleadingly to down-play impact, e.g., comparing the area affected to the area of the entire Cibola NF, rather than comparing to the total area of the Bear Mountains and their drainages.
2-38	Tab. 2-11	Biological Resources: The claims regarding moderate disturbance to vegetation under the proposed action are unjustified. Vegetation around basecamps is destroyed. Species lists used as baselines are taken from transects not representative of the training area. <u>See my list of species in my comment on Table 3-13.</u> Hawk and golden eagle habitat in Baca Canyon are not acknowledged (indeed, Baca Canyon is designated as an area in which heavy vehicles can drive). Statistics are used misleadingly to down-play impact. The mountain lion (top predator) is not included in lists of animals of concern.
2-38	Tab. 2-11	Water Resources: Erosion of land has a negative impact on water resources. Why is this not discussed?
2-39	Tab. 2-11	Land Use, Recreation, and Visual Quality: The claim that the proposed action does not conflict with recreational use and management plans is not justified, as it promotes significant vehicle traffic on roads not designated on the Forest Service map and near inventoried roadless areas. The extensive training, especially the daily presence of aircraft exercises, interferes with the pursuit of solitude or peaceful hiking activities in the area. The PJ exercises take up large areas and interfere with hunting, hiking, and other use of the land. Visual quality of land associated with the HLZs and the basecamp is significantly degraded. In addition, a new management planning process is now underway for the Cibola. A decision on this proposed action should be delayed until that planning process has been completed. Statistics are used misleadingly to down play impact.
2-39	Tab. 2-11	Environmental Justice: Again, statistics are used misleadingly to suggest a small percentage of the affected population is low income. In fact, I would estimate that the population most directly affected is nearly 100% low income. In most cases they are unaware of this proposed action or that they have any ability to comment on it. I would suggest that the Forest Service conduct thorough on-the-ground surveys with local residents and ranchers to determine their views.
2-40	Tab. 2-12	Mitigation Measures: The "mitigation measures" noted are pro-forma, and not realistic. Questions that should be answered include: What experience does the Air Force have in erosion prevention measures, and is it relevant to this environment? Is the claim that HLZs will be restored if no longer needed credible? What process will be used to identify and notify nesting sites for Bald Eagles? What about Mountain Sheep populations in the Bear Mountains? In addition, the "leave no trace" claim is not credible. It is impossible to "leave no trace" with the size and scope of operations proposed. Who would be accountable for monitoring these claims?

Chapter 3: Affected Environment		
Page	Lines	Comments / Questions
3-1	27-34	This paragraph illustrates the propensity to expand military activities on the National Forest, lending support to concerns that the military always wants more. Why has the Forest Service always complied with the military's requests? Has the NEPA process be followed? Has the public been consulted?
3-3	6-7	Note that the HLZs are operated according to military rules, geared toward safety of personnel and the needs of aircraft. Such rules are appropriate to military land, but not to National Forest. Has the Forest Service developed its own set of criteria for military activities on public land?
3-3	22-41	Note the extensive times that aircraft operate. This is particularly disruptive to residents within a 15 mile radius of the HLZ. Note also that my property and residence are within the 5 nautical mile range that aircraft keep when doing exercises. The noise is deafening, day and night. Note also the low altitude of the flights.
3-5	Tab 3-1	Existing exercises at HLZ 10: note the very large number. Again, more appropriate for military land.
3-7	Fig. 3-7	Very disturbing to residents on the Tome area and east of Belen. Why not conduct these exercises on military land? Have residents of these communities been consulted during this process?
3-9	26-39	Note the extensive on the ground activity associated with helicopters. Trespassing on my property is frequent.
3-11	Fig 3-3	My property and one other private parcel are within the 5 nautical mile radius of HLZ 26, and most likely of proposed HLZ X.
3-12	Fig. 3-4	This map is very poor quality and does not show private property or IRAs. However, my property is within the overflight area of both the HLZ 26 landing zone and Cunningham DZ. (This is shown on maps in Chapter 4). Note also Riley, with a number of residents, is within the bounds of the existing landing zones, as is part of the Ladron Wilderness Study Area, and the Bear Mountains. Residents west of the Bears and in Riley are very much bothered by low-flying helicopters. However, they are mostly at the lower end of the economic scale.
3-16		Compliance: Intentional or not, there are frequent very low flights over my property (I would estimate between 500 and 1000 feet). Both helicopters and C-130s. How are such flights monitored?
3-17		Inappropriate Comparison Standards / Noise: This kind of analysis uses the wrong set of standards and obfuscates critical issues. The residents in this area want to be away from cities, in a quiet location. No amount of calculation of decibels, statements that their hearing won't be damaged, etc, will convince them that the noise is not detrimental to their well-being. Suggest developing standards appropriate to wilderness-like areas.
3-18	8-10	Noise: Note the acknowledgment of the wilderness-like characteristics of the land around the training areas in the Magdalena RD. I would think that the wilderness like nature of this land would place a high premium on preserving it as a respite from the noise and congestion of military activities. Again, why has the Forest Service let these training activities become so pervasive?
3-19	Fig. 3-7	Analysis Methods / Noise: Have the military actually measured noise levels or do

		they just use models? I suggest that the Forest Service ask for an independent party to conduct field measurements of noise levels. There should also be a study on the impact of high levels of noise on the sense of well-being of people who have chosen to live in remote locations.
3-20	21-37	Analysis Methods / Noise: Noise level data presented in the EA is derived from models using "notional" flight paths, and is not validated with on-the-ground measurements. Such an approach provides a good zero-order approximation of noise, but scientific standards would require on-the-ground measurements over the entire area to take into account topographical variations, and over an extended period of time to account for actual flight paths. (My experience is that flights are often lower than claimed, and directly over residential areas.)
3-21	2-12	Public Input / Private Property: Notes existence of private residences. Why has the military or the forest service never informed me that my property was enclosed by the military's tactics training area?
3-22	Fig. 3-8	This map is inaccurate as it does not show the current base camp location. My property and at least one other private parcel are within the Tactics Training Area, and also very close to several of the Field Training Exercise Areas. Baca Spring is noted, as it was the previous location of the base camp for field training. However, the basecamp has moved to within sight of my residence. In addition, the map is not sufficiently detailed to show that field training also occurs in Baca Canyon east of Rd. 354. This part of Baca Canyon is a wonderful riparian area and home to many birds and unusual plants. I've observed hawk and eagle nesting sites. Has an environmental survey been done of Baca Canyon?
3-25	Fig. 3-9	Analysis Methods / Noise: These noise contours are based on models that do not use actual flight paths of helicopters. I have observed helicopters and other aircraft flying very different patterns – sometimes they come very low over my house, other times, they fly low up the canyons on either side. So, these estimates of noise are notional, at best. Although this map does not show private property, my residence is within the dBA 60-64 contour (confirmed on Fig. 4-4 on Pg. 422) . I have never been consulted about the noise, nor has anyone ever performed a measurement on my property (to my knowledge).
3-29-34		I am not qualified to comment on the Air Quality section.
3-37	30-39	Lack of Scientific Evidence / Erosion: Where do the statements in this paragraph about erosion come from? Certainly not from on the ground observation. The Magdalena RD is the only area that I have enough experience to comment on intelligently, and the assertions that the potential for run-off is medium and the hazard of water erosion is moderate don't make sense to me. Runoff is very fast during the monsoon season, with new erosion channels forming frequently in disturbed land. Even Rd. 354 is regularly cut by flooding, requiring frequent road-work. These inaccuracies make me question other assertions in the EA.
3-38	1-16	Lack of Scientific Evidence: Have there been on the ground measurements of the impact of the HLZs by the Forest Service or an independent party? There should be ongoing studies of impacts at all sites.
3-39,40		Wildlife: This is a very small list. What about the mountain lion? How are these indicator species chosen? What science is involved? Is there documentation? Why was the mountain lion not included? They are present in every part of the Cibola. The mountain lion is the top predator in these areas, and should certainly

		be included in any EA. What about the antelope? What about bats?
3-42	30-39	Scientific Evidence / Riparian Areas: Have the riparian areas in the Bear Mountains and Baca Canyon (which are included in the tactical training area) been surveyed? If they have, where are the results?
3-42	12-24	Scientific Evidence / Vegetation: Have the Bear Mountains been surveyed for the Zuni Fleabane?
3-44	25-31	Scientific Evidence / Wildlife: Has Baca Canyon in the Magdalena RD been surveyed for Golden Eagle nests or activity?
3-45	Tab. 3-11	Analysis Methods / Wildlife: Why is the Mountain Lion not included? As the top predator, it is an important indicator species, and is certainly present in the Manzanos as well as the Bears and Ladrones. I would also think that the bighorn sheep would be included.
3-48	22-28	Analysis Methods Reference to Figure 3-8 (page 3-22) as showing USFS Transects. This figure shows only two transects, and both are outside of the tactics training area and not representative of the vegetation there. In addition, they are far from riparian habitat in the Bears and Baca Canyon. If these are the only transects, then data is far from sufficient. (See my comments on Table 3-13 below.)
3-48	29-34	Good description of the destruction caused by the HLZs. Have there been ongoing studies on the larger impact (erosion, etc) from the zone. Why would the Forest Service allow 3 more of these HLZs to be constructed?
3-48	35-37	Note that at 8.26 acres, proposed HLZ X will be 5 times larger than existing HLZ 26. The map is not adequate to determine the exact location. However, destruction of 8.26 acres is not compatible with the Forest Services mission to protect the land for all.
3-49	3-13	Similarly, proposed HLZs Y and Z are both larger than the existing HLZ 26, and will cause yet more destruction.
3-19	19-25	Lack of Scientific Evidence / Misleading Representation of Data. I would challenge the description of the area as low shrub species and grassland. Much of this land is pinon/juniper, with large oaks, willows and cottonwoods in arroyos and canyons. Particularly Baca Canyon, and the head of Las Cabras Canyon in the Bears. In addition, this description does not mention that it encloses private land. It also does not mention the size and location of current and previous basecamps, and the damage they have produced.
3-50,51	Tab. 3-13	Lack of Scientific Evidence / Misleading Representation of Data: I have been keeping a species list since 2001 on land that coincidentally is enclosed by the tactics training area. It is highly representative of the region, but underrepresents riparian areas. The transects cited here clearly were not done on representative land, as can be seen from the very limited number of species. Such transects are not adequate to provide a baseline list of species. This indicates a casual approach to understanding baseline vegetation, and raises serious concerns about the adequacy of other data presented in the EA. The table does not include the numerous species of oak, willow, cottonwood, narrow leaf sumac, mountain mahogany; nor do they include representatives from very common genera that I have observed, including, but not limited to, <i>Castilleja</i> , <i>Verbena</i> , <i>Cassia</i> , <i>Astragalus</i> , <i>Helianthus</i> , <i>Berlandiera</i> , <i>Baileya</i> , <i>Mammillaria</i> , <i>Echinocereus</i> , <i>Penstemon</i> , <i>Erigeron</i> , <i>Brickellia</i> , <i>Melampodium</i> , <i>Parthenium</i> , <i>Hymenopappus</i> ,

		<i>Sanvitalia, Senecio, Stephanomeria, Tetraneuris, Themophylla, Thelesperma, Verbesina, and Xanthisma, Lithospermum, Arabis, Dimorphocarpa, Polanisia, Cleome, Evolvulus, Ipomoea, Dalea, Prosopis, Fendlera, Phacelia, Hypericum, Krameria, Monarda, Mentzilia, Allonia, Mirabilis, Gaura, Oenothera, Ipomopsis, Eriogonum, Fallugia.</i> I have observed all of these (often several species) over the years – and I have not even had a systematic approach.
3-52	Tab. 3-14	Analysis methods: I have serious concerns about the small number of species listed as Management Indicator Species for the Magdalena RD. Why does this list not include the Bannertail Kangaroo Rat, the Mountain Lion, Bats, Ash Throated Flycatcher, Nighthawk, Badger, Greathorned Owl, the American Kestral, Redtail Hawk and many other hawks?
3-52	6-11	Lack of Scientific Data: Same comments as above, regarding lack of survey data. Have the Bear Mountains been surveyed for Zuni Fleabane? Has Baca Canyon been surveyed for Golden Eagle eyries? I believe I've seen eagles in Baca Canyon, which is included in the tactical training area.
3-53	Tab. 3-15	Compliance: I have observed that the large vehicles associated with PJ training have flattened many Bannertail Kangaroo Rat mounds. In February 2013, they drove down the track to my property and turned around off-road, flattening a large mound. I walked up to their training camp and talked with them, and noted several other mounds that had been flattened by off-track driving. They were completely unaware that the mounds were associated with an indicator species. How does the military assure that its trainees and officers are trained to protect, or at least not destroy, important species? There should be special training required for all who get permits like the military.
3-56	Tab. 3-16	This is a very small list. What about the mountain lion? What about Black Bear?
3-62	Tab. 3-18	This is a very small list. What about the mountain lion? What about Black Bear?
3-64	20-33	Analysis Methods: Where are the surveyed areas on maps? What about the identified sites? The surveyed areas represent a small portion of the land involved in training.
3-68	31-39	Lack of Scientific Evidence / Inaccurate Data: Notes lack of documentation of flood prone areas. However, it inadequately describes the ephemeral channels near the Bear Mountains. These include not only La Jencia (near the HLZs), and Bear Springs Canyon, but also Las Cabras Canyon (and unnamed channels to its north), Baca Canyon , and channels in its vicinity. These latter are within the Tactics Training Boundary.
3-75	5-10	Misleading presentation of data: The roads and tracks in the Magdalena RD are not appropriate for the use of heavy vehicles, especially in the numbers required by the PJ training. There is already damage to the track to my property from the relatively small number of heavy vehicles. This is evidenced in heavy rutting, increased erosion, to the point where it is difficult for me to drive my FWD Subaru down the track to my residence.
3-81	1-12	Inadequate Presentation of Data / Compliance: Note that Area 13 (see Figure 3-12 on page 3-84) has areas included in the Tactical Training area and near all of the HLZs. These include what seem to be Baca Canyon, and the region directly above my property, which is now the site of the new basecamp for the PJs. How is heavy military use of the area consistent with the management plan? How are management goals tracked? How is military activity monitored?

3-81	34-42	Management Area 16 (see Figure 3-12 on page 3-84) seems to include land in the Bear Mountains, and the direct run-off.
3-85	Fig. 3-12	Inadequate Presentation of Data This map is inadequate to evaluate the overlaps / potential impacts of military use. What is indicated by the area shaded with greenish slanted lines?
3-87	1-19	Lack of Scientific Evidence: What is the source of these statistics? How are statistics accumulated for remote areas? I have rarely seen any forest service personnel on my hikes in the Cibola (other than the Sandia Mountains), and have never been asked to complete a survey. This is after years of hiking and camping in these areas. I question the accuracy of these numbers.
3-89	13-25	This does not mention my year-round residence. It is along Las Cabras Canyon, and is enclosed by the Tactics Training area.
3-89	26-41	Note the inventoried roadless areas in the same area proposed for training. The heavy vehicle traffic compromises these designations. The track to the current basecamp was hardly visible prior to the move in 2012. Now it is a major "road" that will invite use by others.
3-90	12-24	Misleading presentation of data / compliance: The statement that the "informal existing camp sites are those that have been previously used by the public and others (Air Force)" is not true. The current basecamp has flattened a large area along a previously small track used only for fence maintenance. Also note that they include themselves as "other parties" thus including areas that were damaged by their own prior use.
3-90	25-37	Compliance / Private Property: As noted previously, trespassing on my property is not unusual, including damage to my fences. I have never been contacted about this by the military, even after bringing it to their attention.
3-98,99		Environmental Justice / Public Input: Almost all of the people impacted in the Magdalena RD are low income, and many are minority. Many do not have access to the internet, work itinerant jobs, and may be disenfranchised. Even people who do not meet this description have not been informed of the proposed increases in training levels. I would argue that this makes it much easier for the military and the forest service to push through this proposal. I question the fairness.
3-101	Tab. 3-39	Misleading Presentation of Data: Where are the census tracts actually located? I would think that off the people actually affected by the HLZs and training (N. of Magdalena) almost 100% are low-income or minority. I question the relevance of this particular census tract to the issue at hand, and suggest on on-the-ground survey be conducted of those communities and residences directly under the flight patterns.

Chapter 4: Environmental Consequences

Page	Lines	Comments / Questions
4-1,2	32-5	Compliance: Based on personal experience, I question whether these rules are always complied with. How are they enforced? Why do aircraft almost always fly very low over my house? That is only one data point, but it casts doubt on general credibility of the military's claims.

4-2	16-38	Compliance: Again, my experience is that the rules are not always complied with. Even if they were, this constitutes a tremendous amount of noise that will negatively impact the value of national forest land and decrease property values in Magdalena and the area north of Highway 60. Have there been studies to assess impact on property values of such activities? I don't believe that the statements about informing ground personnel about eagle nesting sites will be adequate. And this is not the only species affected.
4-4	Fig. 4-1	Inappropriate Use of Public Land. This is tantamount to creating a military base just N. of Magdalena on Forest Service land. I cannot understand how it can be justified, especially since the military already controls so much land in NM.
4-6	1-4	Noise: These criteria are appropriate to evaluate impacts in urban environments and industrial situations. They are inappropriate to evaluating noise impacts in the National Forest where people have an expectation peace and the chance to recreate away from cities. They are also inappropriate for determining risk to wildlife and to grazing operations.
4-6		The material provided on this page seems duplicative of material already provided in Chapter 3. Again, see my comments above.
4-7	4-23	These noise levels are inappropriate for national forest.
4-7	24-38	Noise: Yes, visitors to the Cibola would like a quiet natural setting. The Bear Mountains are one of the four mountain ranges in the Magdalena RD, and visitors to this inventoried roadless area should not have to deal with the noise levels of helicopters 250 days (and nights) each year. The notation that the ground area is only 325 acres is disingenuous at best, as the flight paths of helicopters and other aircraft are very extensive. This paragraph uses meaningless statistics to distort the on-the-ground experience.
4-8	30 – 38	Noise / Misrepresentation of Data: I don't understand these numbers. Are they stating that the noise levels associated with the aircraft at less than 500 feet AGL (40 – 47 dBA) are less than quiet urban daytime (see Fig. D-1 in the EA Vol 2.) This is just not credible! Where do these numbers come from?
4-9	14-25	Noise: "Moderately or more annoyed" does not express the experience of those in the area. Nor does the annoyance last only as long as the noise is present. Sleep disruptions take a long time to reverse. Have they measured the long-term effects of such high levels of noise on wildlife and cattle? Those looking for a wilderness experience will be sorely disappointed.
4-13	32-36	Noise / Misrepresentation of Data: It does not make sense to me that vehicular traffic will be louder than aircraft. Although the sound of heavy vehicles is very disturbing, it is nothing compared to the sound of aircraft – even at 5 miles from the HLZ.
4-14	15-24	Noise / Misuse of Standards: What is the reason for using 30-40 dBA as a baseline for ambient noise in wilderness areas? According to Fig D-1 in Appendix D, quiet rural nighttime is about 25 dBA. Note that the noise levels of the vehicles noted here are very high even for a noisy urban environment. I fail to understand why the Forest Service allows such activities on public land. Again, the claim that annoyance ends when the sound ends is not correct, as noted above.
4-14	37-41	Location: My property and residence are enclosed within the existing tactics training areas, and the base camp is within sight of my house. Although I would prefer that all these activities move to military land, I strongly suggest that these

		areas be moved to locations at least 5 miles from habitation.
4-15	7-18	Noise: These are very high noise levels over a significant area.
4-15	19-37	Noise: My residence is one of the two referred to. As noted, this is wilderness like, and therefore the standard for noise should be much lower than for urban environments.
4-15	38-41	Noise: The disturbance with small arms firing goes beyond noise. It very disturbing (even frightening) to be confronted by such activity. I cannot imagine what wildlife experience. Have these impacts been studied?
4-16	5-20	Noise: Impacts on wildlife and people do not end immediately with cessation of noise. In fact, impacts on wildlife could be much more profound than for humans. Has this been studied?
4-16	21-27	Mission Creep: Although the military claims that there will only be 5 7-day periods of noise per year, history shows that the number of training exercises has increased over time. In addition, the site will be used for training by other parts of the military, for example the Marine Corp, which is not considered here.
4-16	31-38	Misleading Presentation of Data: Need noise contour maps for the combined effects of these activities. Showing them individually is disingenuous. (See page 4-22)
4-17	11-16	Misleading use of statistics / noise: Comparison of over-flown area with the entire Magdalena RD misleadingly minimizes the impact (14%). The more relevant number would be the percentage of land in the Bear Mountains and immediate surroundings that are overflowed – which would be much higher. Note that under the proposed action, the ground surface below aircraft tracks more than doubles to 121,917 acres.
4-17	39-41	Misleading Presentation of Data: Note that the EA uses the conditional case as in “people could frequent the area occasionally... ” The fact is that people actually live in the area, and therefore do frequent the area regularly . Even those who don’t live there do frequent the area more than occasionally. This cavalier attitude towards those who enjoy the Magdalena RD is pervasive throughout the document.
4-19	Tab. 4-2	Noise: Note the huge increase in noise levels associated with the proposed HLZs. The existing noise levels already are highly disturbing. These proposed changes will have a dramatic effect on quality of life in a very large area, even west of the Bears.
4-20	1-20	Noise / Inappropriate Standards: The analysis presented here may be appropriate to urban areas or industrial settings, but not to national forest. Also note that my residence is within the 60 – 64 dBA contour. (See Figure 4-4 on page 4-22).
4-20	34-41	These additional noise levels are very high – with exposure levels of up to an hour.
4-16-20		Noise / Confusing Presentation of Data, Misleading Use of Statistics: General comment about this section on Aircraft Operations at HLZ: It is very difficult to follow this analysis, even for a person such as myself with a PhD in physics. I became bogged down in the discussion, especially going back and forth between this section and the appendices. The use of statistics and analysis appropriate for urban or industrial conditions seems very inappropriate. People in national forests also have the expectation of quiet. And wildlife have different requirements than people. It is hard for me to understand why the Forest Service even contemplate

		this proposal.
4-23	Fig. 4-5	Noise: Note the significantly greater area exposed to high noise under this proposal. The people living in and around Magdalena are not aware of this, and no one has tried to inform them. I also don't understand some of the suggested decreases in noise exposure at some locations. This may not correspond to accurate flight patterns.
4-27,28	22-37 1-40	Noise: Once again, I don't think that these are the appropriate benchmarks to judge the impact of noise in the national forest.
4-30-33		Noise: These noise levels are already very high. See previous comments.
4-37	21-37	Misrepresentation of Data: The suggestion that motorized traffic by non-military operations is similar to that of the military is absurd. There is negligible non-military heavy vehicle traffic in these areas. Also VR-176 aircraft are much less frequent.
4-39	Tab. 4-3	This table notes emission totals, but not at particular locations. How will air quality be affected within 5 miles of the existing and proposed HLZs?
4-41	1-25	Incompatibility with Forest Service Mission: Why would the forest service consider allowing an area greater than 7 times that of HLZ 26 to be "reduced to bare rock?" Is this consistent with the mission of the forest service? Note that the area impacted will be much larger than the actual HLZs themselves. And the impact on erosion will be greater yet. It is impossible to isolate such impacts in this environment. Have there been studies on the long-term effects of such activities? The notion that sites could be returned to pre-existing conditions if no longer needed is absurd.
4-41	Tab. 4-4	Misleading use of statistics: The total area to be impacted in the Magdalena RD will increase by an order of magnitude (70.46 acres versus 7.43 acres), and will likely have far-ranging effects. La Jencia and Bear Canyon runoff areas will likely have the worst impact. Comparing this area to the total area of the Magdalena RD is not appropriate. The Bear Mountains are critical habitat that should not be compromised! There is no comparable area between Hiway 60 and the Sierra Ladrones into which these species could move. Again, why would the forest service contemplate such damage?
4-42	21-40	Misrepresentation of Data / Lack of Scientific Evidence / Compliance: I challenge the assertion that only existing campsites are used and that little long-term damage can be expected to occur.
4-44-45		Lack of Scientific Evidence: Note that there is little direct evidence (e.g., no studies) of the impact of noise levels on birds and other wildlife. A few very limited (albeit relevant) studies are cited, but these were not in the Cibola.
4-46	33-37	Lack of Scientific Evidence: "No direct evidence" is not the same as "evidence that noise does not disrupt." The phrasing is misleading. The same comment applies to the Black Bear (pg. 4-47).
4-47	8-17	Lack of Scientific Evidence: I assume that there have been studies that led to the conclusion of "some displacement to less exposed areas may occur." Which studies are those?
4-47,48		Lack of Scientific Evidence: I have not had time to read Delaney (1999) and Johnson (2002) to assess the credibility of these studies. Were these published in peer-reviewed journals?
4-51 - 64		Misleading Analysis Methods: Separating the analysis of HLZ 26, X, Y, and Z and

		the drop zone is very confusing and even misleading. The real impact is cumulative. The analysis is the same, more or less, for each, but how do impacts scale with size? Is the scaling linear or non-linear? Have relevant studies been done? Sometimes a tipping point is reached in which an entire ecosystem is moved into a different phase.
4-52	7-34	Misleading Presentation of Data: These comments are speculative at best. A disturbed area can propagate through events such as erosion. Again, separating out noise from HLZ 26 from the others proposed is an inaccurate reflection of the noise environment.
4-53	7-12	Lack of Scientific Evidence: What evidence supports the statement that the Golden Eagle will suffer no adverse impacts? Have the riparian areas in the Bears and Baca Canyon been surveyed sufficiently to alert Air Force personnel of locations?
4-53	Tab. 4-6	Lack of Scientific Evidence: Note that almost every species will be impacted just from the activities of one HLZ in isolation. What will be the combined effect?
4-55	11-19	Note that the total affected area of just this one HLZ will be about 37 acres of bare soil and rock, with all vegetation destroyed. This is a significant area.
4-56	Tab. 4-7	Lack of Scientific Evidence: The baseline hypothesis should be that all species the area will be affected, with evidence provided to demonstrate otherwise. The Bear Mountains are critical habitat, and isolated from other similar environments.
4-58	Tab. 4-8	Analysis Methods: All animal species will be impacted. Again, it doesn't make sense to separate the impact of the HLZs. The Bear Mountains are critical habitat in isolation from other similar areas.
4-61	Tab. 4-9	Note that HLZ Z will have the most impact on listed species. Same comments as above.
4-63	Tab. 4-10	Misleading Representation of Data: All species present in the area will be impacted. Presenting the same analysis for each HLZ in isolation is confusing and misleading.
4-64	19-28	Analysis: This paragraph fails to discuss long-term impact on vegetation and habitat at base camps, which is significant.
4-67	10-19	Lack of Scientific Evidence: I challenge the assertion that campsites will have no long-term impact. In this fragile environment, even one night of tent and associated foot traffic can result in damage that takes years to recover. What evidence justifies this assertion.
4-69	9-25	Lack of Public Input: Have ranchers in the area been consulted about their observations? What will happen when the noise levels increase so substantially (decibels, area affected, and percentage of time)?
4-70-90		I am much less familiar with the Mount Taylor Ranger district, and the Copper Canyon area of the Sandias so will not provide specific comments. These areas will not be subject to heavy aircraft noise and ground-based training.
4-92-93		Lack of Scientific Evidence: Alternative 1 is significantly better than "the proposed action." However, disturbance should not be expected to "stabilize". Indeed, disturbance will increase over time as impacts compound. What evidence is provided to support the assertion of "stabilization?"
4-95	15-32	Lack of Scientific Evidence: Long Term Impacts: Even if all activity ceases, the impacts will remain for years. Rehabilitation will likely be needed. It would be better to stop now and let the recovery begin.

4-97-98		I am less familiar with cultural and archaeological resources in these areas. Based on problems with analysis of vegetation, however, I would question whether the areas have been surveyed adequately.
4-100	31-35	I have already commented on this in Chapter 3. To reiterate, however, new erosion channels are constantly forming, and the proposed action will almost certainly have an impact – especially the new HLZs.
4-108	19-28	Lack of Scientific Evidence: I would challenge the assertion that base camps and heavy vehicular traffic on forest tracks to the base camp do not alter draining patterns. The current base camp is a good example. In addition, many of the tracks used conveying personnel are not designated Forest Service roads. These include the "road" for accessing the base camp, the tracks down Baca Canyon east of 354, and the track to my property.
4-108	30-37	Misleading Use of Statistics: The increase in traffic on the roads used for training (especially in the Magdalena RD) will be very significant. Understanding its impact requires a comparison to non-military traffic on the roads utilized by the military, rather than with vehicular traffic in the Cibola as a whole. Again, this is a misleading use of statistics.
4-109	3-9	Compliance: Once again, the assertion that vehicular traffic stays on designated NSFR is wrong. See previous comments above.
4-114	2-8	General: The Cibola Management Plan is under revision, with plans to complete over the next two years. Why must the decision on military operations be made now, rather than waiting until the new management plan is adopted?
4-114	9-17	Misleading Use of Statistics: Again, a comparison to the entire Magdalena RD is misleading. Should compare to the total land in the vicinity of the Bear Mountains, especially the Inventoried Roadless Areas. The percentage would be much higher.
4-115	2-39	Misleading Presentation of Data: The Bear Mountains and land just to the east are where most recreational activities occur north of Magdalena. Military activities already interfere with recreation in this area. Noise from existing helicopter and airplane traffic already presents a significant disturbance. Under the proposal it would be much worse. Claims that disturbance lasts only as long as the aircraft are overhead are absurd. Such heavy helicopter traffic completely destroys the wilderness experience. The same is true for encounters with land navigation and other training activities. The areas where on-the-ground training occurs are fairly extensive, and campers or hunters would be forced to relocate should the military arrive while they are there. This paragraph is a distorted perspective of the impact on recreation, and once again misuses statistics to underestimate the impact.
4-116		Misleading Use of Statistics: Tables 4-19 and 4-20 again demonstrate a misleading use of statistics. The impact of such large-scale operations is not confined to exact locations under flight patterns and within a tactical training area.
4-117	7-20	Misleading Use of Statistics: Disturbance caused by aircraft is not limited to areas below ground tracks. Again, misleading use of statistics to compare to the entire Magdalena RD, or to the entire Sierra Ladrones WSA.
4-118		Misleading Use of Statistics: Comments similar to above about misleading use of statistics.

4-118	10-18	Misleading Presentation of Data: Stating that a Smokey SAM or smoke grenade could be a distraction is a significant understatement. Describing the environment around the HLZs as "dust-clouded atmosphere" is inaccurate. Helicopter operations create a very large dust storm that propagates over a large area especially in windy conditions.
4-119	1-9	Lack of Public Input: Have the residents near the existing and proposed HLZs been consulted about their experiences? Do they agree with these assertions?
4-119	14-25	Compliance: Again, I challenge the assertion that only existing campsites are used. It is also impossible to leave no trace in these environments.
4-130	2-17	Environmental Justice / Public Input: Have the low-income populations in Riley and along Rd 354 north of Riley been consulted to get their views? I suggest that they do not even know that this proposal exists. It is easy to assert that these activities will not affect them, but justice requires that they at least be directly informed and consulted. Not only is their daily experience degraded by the frequent helicopter overflights, but the values of their property could decline under the proposed action.
4-131	28-37	Note that no other activities in the Cibola NF produce significant amounts of noise. This is the way it should be.
4-133	4-15	Scientific Evidence / Misleading Presentation of Data: What is the justification for the assertion that recreational activities in the Cibola will have a larger impact on soil erosion than ground training activities? Stating that impacts from rotor wash at the HLZs will be localized is misleading, as is the assertion that erosion can be controlled by building berms. How will this be monitored?
4-134	16-22	Lack of Scientific Evidence: Stating that no change in population trends would be expected for any species seems unjustified. Impact on mountain lion habitat was not even considered. Also, averaging across the entire Cibola is inappropriate, as regions such as the Bears may have a disproportionate influence on the whole.

Attachment B

Comments on Draft EA and Questions for Forest Service

November 22, 2013

November 22, 2013

Ms. Cheryl Prewitt
Cibola National Forest
U.S. Forest Service
2113 Osuna Rd., NE, Ste. A
Albuquerque, NM 87113

Dear Ms. Prewitt:

Thank you for deciding to host an Open House in Magdalena to solicit more input on the "Draft Environmental Assessment of Military Training Exercises within the Cibola National Forest near Kirtland Air Force Base, New Mexico." While I am disappointed that you are not conducting a more formal meeting, I am gratified that you are willing to accept additional written and verbal comments.

As I now understand the process better than I did in August when I submitted my original comments, I would like to supplement those with the attached documents. This should put me in a position to object to a wider set of issues when the next version of the Environmental Assessment is made public.

I also request a written response from the Forest Service and the Air Force to the set of questions I have attached. Some of the questions are included in the comments document, but I wanted to draw a little more attention to these questions.

Sincerely,



Arian Pregenzer



Questions to the Forest Service and the Air Force

- Has the Department of Defense assessed the availability and suitability of military lands for this training as required by the 1988 Master Agreement? If not, why? If so, is it available to the public?
- Why did the Forest Service accept an Environmental Assessment from an Air Force contractor? Has the FS done its own EA?
- Why didn't the Air Force Environmental Assessment evaluate meaningful alternatives:
 - Alternatives to use military lands instead of forest lands
 - Alternatives to minimize impacts on inventoried roadless areas, riparian areas, wildlife, livestock and humans
 - Alternatives to reduce numbers of events
- Why didn't the Forest Service do more to educate citizens in affected areas?
 - Why are copies of the EA not available at Forest Service offices?
 - Why aren't all comments posted on the FS website?
 - Why was so little time allocated to comment on 700+ page EA?
- Why hasn't the Forest Service called for an Environmental Impact Study?
 - The length / complexity of the EA indicate need for EIS
 - No meaningful analysis of impacts since 1988
 - The EA does not take a hard look at impacts
- What rules govern military training in this area?
 - Does the Forest Service monitor military activities? There are many examples of noncompliance, including trespassing on private property and driving off-road.
 - Are there altitude limitations for overflying residences?
- Are there financial arrangements between the military and the Forest Service? What about others?
 - Does the military have arrangements with some land-owners not to overfly their property? If so, what are the terms?
 - Does the military have contracts with local businesses or citizens? If so, what are the terms?

Date: November 22, 2013
To: Cheryl Prewitt, Cibola National Forest

From: Arian Pregenzer
Name / Signature

[REDACTED] –
Phone Number

[REDACTED] –
Address Email [REDACTED]

Subject: **Comments on “Draft Environmental Assessment Military Exercises in the Cibola National Forest...”**

The U.S. Forest Service has not done enough to inform the public about this project.

- The Environmental Assessment (EA) is too long and complex. Extensive outreach is needed to explain the issues, and one 2-hour public meeting is not enough. Few local residents received notice of the November 22 meeting. Why did the Forest Service not contact all residents of Magdalena and outlying rural areas through mail?
- Many residents in the impacted areas do not have internet access, and most were unaware of the existence of the EA or the opportunity to comment between July 21 and August 21, 2013. Most do not know about the additional opportunity to comment on November 22, 2013.
- Guidance about how to submit comments and requirements for comments to have legal standing has not been clear. Most don't know that they will have no right to object to the next EA if they did not submit comments July 21 – August 21 or on November 22.
- The Forest Service should establish a grace period for comments after November 22 and should provide information through additional public meetings, mailings, and other means that will reach all citizens in the impacted areas. Information should succinctly describe the Air Force's proposal, summarize impacts, describe the range of possible outcomes, and provide guidance for commenting.

The Department of Defense and the Forest Service should provide their analysis of the suitability and availability of military land for the purpose of this training, as required by the 1988 Master Agreement.

- An agreement formalized in 1988 between the Departments of Agriculture and Defense requires the DOD to assess the suitability and availability of military lands for military activities before pursuing national forest lands.
- This assessment should have been completed prior to initiating the NEPA process to renew the USAF's special use permit for conducting training exercises.
- As far as we know, this assessment has never been completed as it has not yet been provided to the public.

The Air Force's Environmental Assessment (EA) does not include a range of reasonable alternatives.

- The EA failed to evaluate the use of military land for this training. It should evaluate an alternative that locates proposed trainings on military land. There are over 5,500 square miles of land controlled by the Department of Defense in New Mexico, including the San Andres Mountains within White Sands Missile Range that have varied topography and elevations equal or greater than that of the Bears.
- The EA did not consider alternatives that minimized impact on the Scott Mesa and Goat Springs Inventoried Roadless Areas. It must consider an alternative that minimizes impacts on these areas.
- The EA did not consider alternatives that minimized impact on sensitive riparian areas, including but not limited to Las Cabras Canyon, Bear Springs Canyon, and Baca Canyon in the Bear Mountains. It should consider alternatives that minimize such impacts.
- The EA failed to consider alternatives to existing and proposed flight paths and locations of training zones to minimize impact on citizens, and private property. It should consider such alternatives.
- The EA failed to consider alternatives that reduced the numbers and levels of training exercises taking place within the forest. It should consider such alternatives.

Continued.....

An Environmental Impact Statement (EIS) is needed to address potential impacts and public concerns.

- The EA demonstrates that impacts to the environment are likely to be significant. There has been no meaningful environmental analysis since 1988. It needs to be done now.
- At 350 pages plus appendices, the EA is inappropriately long. This indicates the need for an EIS.
- The EA includes many shortcomings that should be addressed in an EIS, including, but not limited to:
 - Reasonable alternatives were not analyzed (as noted above).
 - Vegetation data bases are unrepresentative and based on transects outside the tactical training area. Dozens of plants within the tactical training area are not on the list.
 - Wildlife data bases do not include key species, such as the mountain lion and black bear.
 - Erosion properties of impacted land are not adequately characterized.
 - Models used to characterize noise levels did not use accurate flight paths, and they have not been validated with on-the-ground measurements.
 - Standards for evaluating noise impact are inappropriate for rural / forest settings.
 - Risks of fire and impacts on public safety are not adequately addressed.
 - Impacts of land training on wildlife, livestock and vegetation are not adequately evaluated.

The US Air Force's EA did not analyze or take a "hard look" at impacts, including the following:

- Impacts that the proposed training will have on the Scott Mesa and Goat Springs inventoried roadless areas.
- Impacts that the proposed training activities will have on wildlife, vegetation, and sensitive riparian areas in the Bear Mountains and its watersheds.
- Direct and cumulative impacts to wildlife, livestock and humans from chronic noise exposure.
- Impacts on the mountain lion, which, as the largest carnivore, has significant impact on the entire ecosystem.
- Impacts to public safety and health, e.g., increased risk of fire, falling ordnance.

There is a lack of scientific evidence to support decision-making.

- There have been no long term studies of the impact of training on vegetation, wildlife and soil, and therefore there is no scientific basis for making decisions about continuing or expanding these activities. An independent assessment of environmental impact, using scientifically rigorous methods, should be required.
- There have been no efforts to evaluate the impact on quality of life for local residents, including health, safety, property damage, and impact on property values. An independent assessment of such issues, that includes extensive public outreach, should be required.

Environmental Justice has not been adequately addressed.

- Many in the affected population have few resources or access to information. In addition, their complaints to the Air Force about noise levels have been ignored for years.
- A full assessment of the disproportionate impact of military training on low-income populations should be required.

We request the following changes in ongoing operations:

- The Forest Service should monitor Air Force compliance with existing rules and regulations.
- Vehicular traffic on roads not designated on official Forest Service maps (including tracks off 354) should cease.
- Riparian Areas and Inventoried Roadless Areas should be off-limits to training activities. Riparian areas include Baca Canyon, Las Cabras Canyon, as well as others.
- The existing Tactics Training and Field Training Exercise areas should be moved so they do not include private property. Base camps and high-noise training and pyrotechnics should not be visible from or occur within 5 miles of residences.
- Aircraft ground tracks should avoid private residences by at least 5 miles and altitude levels should be strictly monitored.

Attachment C

Supplemental Comments on Draft EA,
Documentation of Damage, and Correspondence with Elaine Kohrman

February 3, 2014

February 3, 2014

Ms. Cheryl Prewitt
Cibola National Forest
U.S. Forest Service
2113 Osuna Rd., NE, Ste. A
Albuquerque, NM 87113

Dear Ms. Prewitt:

Thank you very much for having extended the comment period for the "Draft Environmental Assessment of Military Training Exercises within the Cibola National Forest near Kirtland Air Force Base, New Mexico."

I very much appreciated your hosting the Open House in Magdalena on November 22. However, at that meeting, I was astonished to learn that the description of existing activities (Alternative 1) and the description of the "Proposed Action," in the EA may not be accurate. It just doesn't make sense to ask the public to comment on an admittedly inaccurate document. In addition, I believe that the public was confused by the conflicting descriptions of Air Force activities, and by the fact that the proposal in the EA only represents a small part of military activity in the area.

I know that you and Elaine Kohrman are working with the Air Force to get an accurate description of current and proposed training activities as well as to achieve a comprehensive picture of all military activity in the area. I believe that this full, accurate description should be made available to the public before moving ahead.

I've attached several documents that I ask you to treat as supplementary to my previous comments of November 22, 2013 and August 22, 2013. Thank you once again for the opportunity to comment.

Sincerely,



Arian Pregenzer



Attachments:

1. Supplemental Comments on "Draft Environmental Assessment...."
2. Damage to the Environment Associated with Military Training in the Cibola
3. Letter to Elaine Kohrman about Personal Concerns with Attachments

Supplemental Comments on “Draft Environmental Assessment Military Exercises in the Cibola....”

February 3, 2014

Arian Pregenzer

1. The meeting in Magdalena on November 22, 2013 demonstrated that neither the Air Force nor the Forest Service understand what the military is doing currently in the Magdalena RD, what they plan to do, or why they cannot do this on military land. The description of current and planned activities was inconsistent with the Environmental Assessment. In addition, neither the Air Force nor the Forest Service was able to describe the full range of other military activities in the Cibola and surrounding areas. Although the Temporary Special Use Permit and the Military Operating Plan have been made available on the Forest Service Website, they do not provide details about specific allowed activities. Moreover, it seems clear that neither the Forest Service nor the Air Force has planned adequately for dealing with fire. It is vital that these issues be addressed and that accurate information be provided to the public before moving ahead.
2. Existing military activities in the Magdalena Ranger District already have a significant impact on local residents, wildlife, livestock, and the environment. Nor is the military is complying with the terms of the Temporary Special Use Permit or their Operating Plan. In the film presented on January 21, 2014 at the Cibola headquarters in Albuquerque, three residents describe the impacts of aircraft overflights and activities and behaviors during land-based training. I have also documented other non-compliant behavior in the attached “Damage to the Environment Associated with Military Training in the Cibola.” Noncompliant behaviors include:
 - Flying too close and low over private residences;
 - Conducting intensive training with simulated munitions near children and residents;
 - Leaving fires unattended in time of severe drought;
 - Leaving behind trash that litters the landscape and is hazardous to humans and livestock;
 - Driving on undesignated tracks and establishing large base camps on fragile ground, which increases erosion, destroys vegetation and habitat, and introduces noxious weeds; and
 - Training in riparian areas with water sources for wildlife and livestock (e.g., Baca Canyon).
3. Because of the significant impact of existing activities I ask that changes be made now to existing Air Force operations in the Magdalena Ranger District:
 - The Forest Service should monitor Air Force compliance with existing permits and regulations.
 - The existing Tactics Training and Field Training Exercise areas should be moved so they do not surround private property. Base camps and high-noise training and pyrotechnics should not be visible from or occur within 5 miles of residences.
 - Aircraft ground tracks should avoid private residences by at least 5 miles and altitude levels should be strictly monitored.
 - Riparian areas and Inventoried Roadless Areas, e.g., Baca Canyon, Las Cabras Canyon, Scott Mesa, should be off-limits to military training, and vehicular traffic on undesignated roads should cease.
4. Based on the 1988 Master Agreement and criteria established in Forest Service guidance for implementing the NEPA process, we do not understand why the analysis of military land for this training has not been provided to the public. Nor do we understand the reasons for not doing a full Environmental Impact Statement (EIS):
 - The 1988 Master Agreement states that the military will analyze the availability and suitability of military land before initiating the NEPA process for training on Forest Service land.

Supplemental Comments on "Draft Environmental Assessment Military Exercises in the Cibola...."

- Existing operations and the Proposed Action have a significant impact on the environment, which indicates the need for an EIS.
- The EA has significant flaws, including but not limited to:
 - Failure to consider reasonable alternatives, including the use of military land;
 - Failure to analyze significant impacts on people, wildlife, livestock, soil and vegetation;
 - Unrepresentative data bases for vegetation and wildlife;
 - Failure to analyze the cumulative impact of all military activity in the area; and
 - Failure to analyze impact on local economy, including property values.

5. I request that the following information be made available to the public before moving on to the next stage of the process:

- Accurate description of existing and proposed military activities in the Magdalena Ranger District, including actual numbers of existing and proposed helicopter overflights and numbers and types of rounds fired annually;
- Analysis of the availability and suitability of military land for this training, as required by the 1988 Master Agreement;
- Summary of all other military activities being conducted in or near the Magdalena RD;
- A detailed description of specific activities allowed by the Temporary Special Use Permit, as well as other documents, e.g., written permission to utilize undesignated tracks and new areas for basecamps; and
- Plans to respond to fires and release of hazardous material during training activities.

Appendix A

Damage to Environment Associated with Military Training in the Cibola Tactics Training Area

Arian Pregenzer, February 3, 2014

In November 2012, the Forest Service authorized the Air Force to change the location of the base-camp used for land based training to a location within sight of my residence. The following pictures document the damage to vegetation and soil erosion that has occurred after just 3 or 4 training events. The first event was in November 2012. The second was February 2013. There was at least one more over the summer of 2013. In November 2013, the base camp was moved back to the original location in Baca Canyon, and the disturbing events described by Johnny Kryntz occurred during training the week of November 18th, 2013.

These photos demonstrate that the military is not abiding by the terms of their Temporary Special Use Permit and their Military Training / Maneuvers Operating Plan by 1) driving on undesignated roads and driving cross-country; 2) not preventing and controlling soil erosion and gullying; 3) not controlling noxious weeds in utilized areas; 4) not cleaning up trash; and 5) trespassing on private property.

Photos from February 28, 2013



Figure 1. The track to the base camp established in November 2012, heading west. This track leaves 354 about 100 yards north of the track to my property. Hell's Mesa is in the background. Note the track heading across open ground toward the left – which is where the numerous military vehicles drove off-track around the basecamp. Neither of these tracks are designated on the Motor Vehicle Use Plan, therefore travel on them requires written authorization by the District Ranger, according to the Military Training / Maneuvers Operating Plan; 9.1.



Figure 2. Looking north along the left-hand track shown in Figure 1, showing damage to vegetation from off-track driving. Prior to the military using this location as a base camp in November 2012, this area was not damaged.



Figure 3. Damage caused by the temporary shelters, trailers, and other activities in the area around the base camp.



Figure 4. Extensive damage around the camp fire area associated with the base camp.

Photos from August 23, 2013

The following photos were taken in area near the base camp at locations similar to those of February 2013 above.



Figure 5. Heavy erosion after summer rains on track to the basecamp (same general view as Figure 1 above). This violates the Temporary Special Use Permit paragraph 22.



Figure 6. Track to the north (same as in Figure 2 above) showing longer term damage and weedy vegetation.



Figure 7. Weeds and damaged soil around the base camp, contrast with healthy vegetation below in Figure 8. Failure to control noxious weeds (e.g., tumbleweed) violates the Temporary Special Use Permit paragraph 23.



Figure 8. Healthy vegetation in area near basecamp, showing how it would look if the training area had not been used.



Figure 9. Parachute casings on my property August 23, 2013. I have picked up hundreds of these (as well as the parachutes themselves) over the years. My fence has also been cut and the military has crossed my property. This violates the terms of the Military Training / Maneuvers Operating plan and demonstrates trespassing on private property.

In addition to the damage shown in these photos, the track leading into my property (354Q on some maps) has been heavily eroded and damaged by heavy military vehicles to the point where I have difficulty getting into my property. According to the Temporary Special Use Permit, paragraph 7, the military should be responsible for repairing damage to this track.

Appendix B: Letter from Arian Pregenzer to Elaine Kohrman, December 20, 2014

December 20, 2013

Ms. Elaine Kohrman
Forest Supervisor, Cibola National Forest
2113 Osuna Rd., NE, Ste. A
Albuquerque, NM 87113

Dear Ms. Kohrman:

Thank you for the opportunity to provide you with ideas for addressing my specific concerns about the Proposal for Military Training in the Cibola as it impacts my private property and my quality of life. Although I have made general suggestions in the comments I submitted in August and also on November 22, I will address my personal concerns here.

My property and residence (see attached maps) is completely enclosed by the Tactics Training Area and directly in the flight path for all aircraft currently utilizing HLZ 26. If the Air Force is granted the permit for the Proposed Action, my residence will be directly in the flight path for a significantly larger number of aircraft.

Land-based training has already caused me numerous problems:

- Frequent trespassing over my property, including one instance of cutting my fence.
- Bags of trash from parachute flares and other training aids, e.g., an Arab headscarf near my cut fence.
- High levels of noise from the pyrotechnics, generators, and vehicular traffic.
- Destruction of environment / habitat along the track to my property (354Q on some maps).

Helicopters and aircraft also cause significant disturbance:

- Low-flying aircraft day and night, in both linear approach to the HLZ and circling over my property, is unacceptably noisy and invasive. For example, they fly so low that I cannot use my outdoor shower on afternoons when they are in the area. My windows vibrate and my house shakes.
- The HLZ 26 is close enough to my property, that given the prevailing wind patterns, dust generated by the Ospreys and other aircraft making touch and go landings comes over my house and interferes with my view.

My requests for addressing these concerns in the short term are:

- Move the tactics training area so that it does not enclose my property. The base camps and high-noise training and pyrotechnics should not be visible from or occur within 5 miles of my residence. Since only 15,000 acres are needed, the Air Force should be able to use military land (e.g., San Andres Mountains in White Sands).
- Close the entire track into my property (designated 354 Q on some maps) to use by the military and other vehicles. Keeping this half-mile track open is highly destructive to the environment, as it dead ends at my property, requiring vehicles to drive off-road to turn around. There is already extensive environmental damage, including most recently the flattening of kangaroo rat mounds by military vehicles in February 2013.
- Reroute aircraft so that ground tracks avoid my residence by 5 miles.

These suggestions and requests regarding my personal concerns should not be construed as superseding my previously submitted extensive comments on the Draft EA.

Thank you very much for your attention,



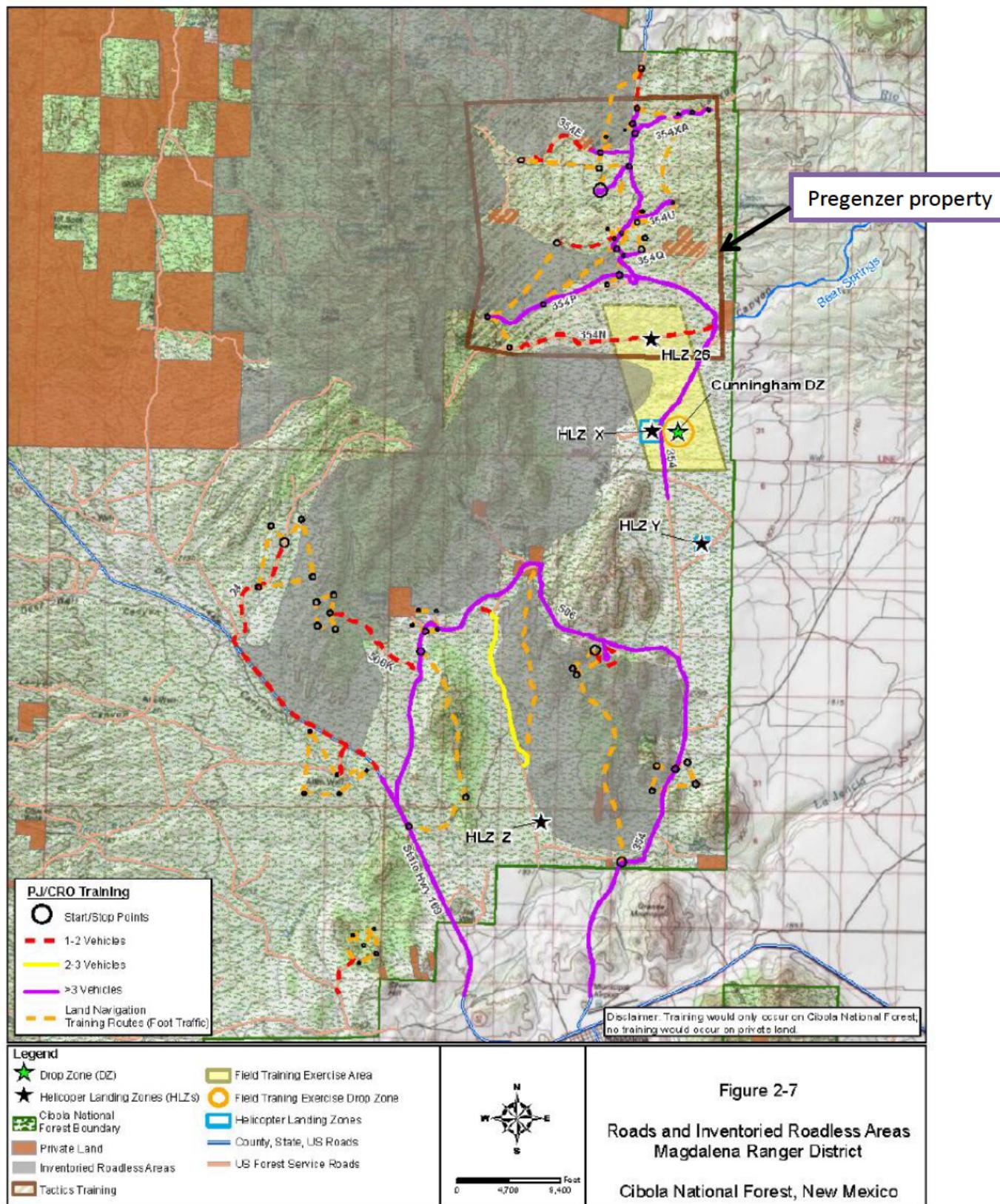
Arian Pregenzer



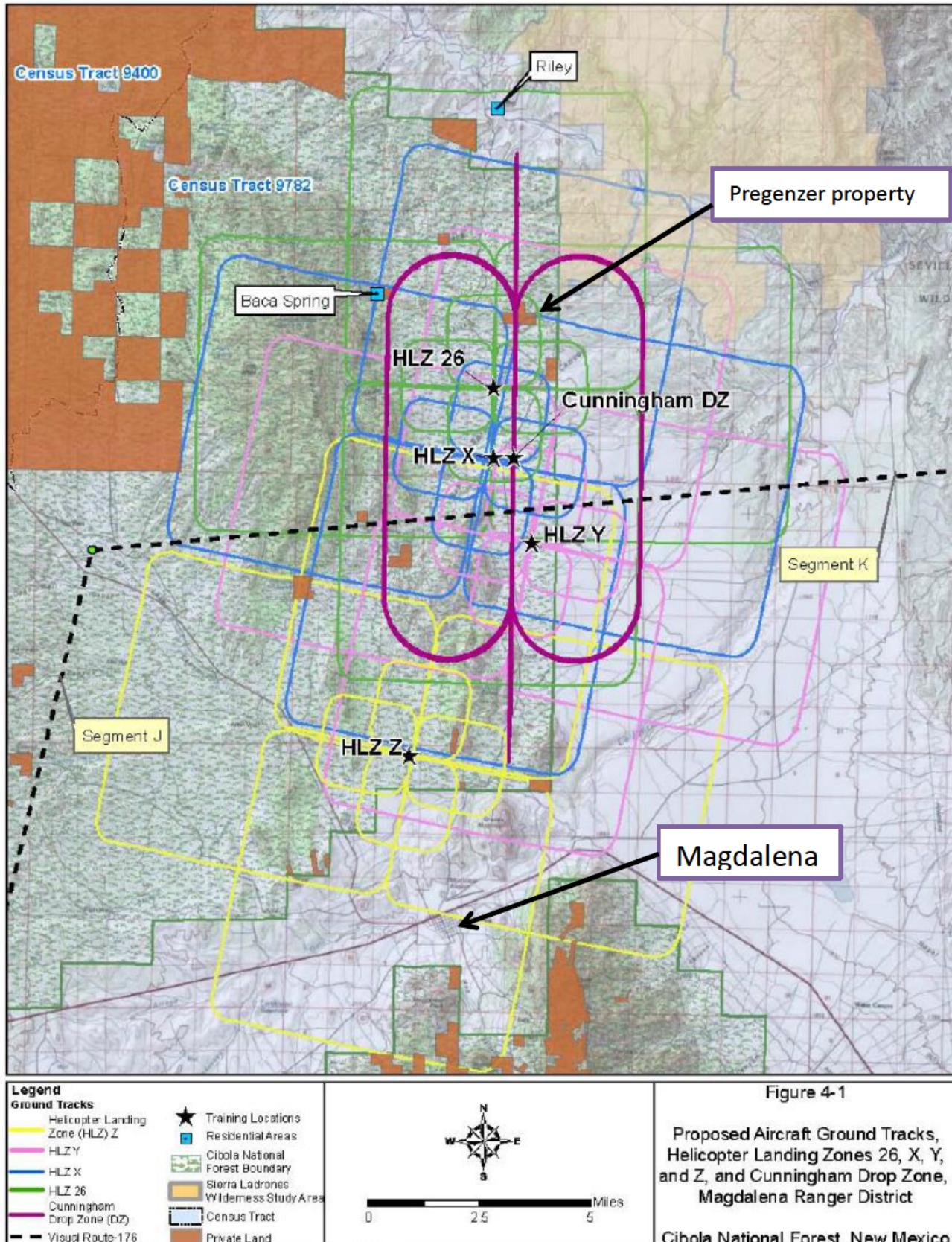
Supplemental Comments on "Draft Environmental Assessment Military Exercises in the Cibola..."

Appendix B: Letter from Arian Pregenzer to Elaine Kohrman, December 20, 2014

Attachment 1: Map Showing Arian Pregenzer's Property within Tactical Training Area and Near HLZ 26



Attachment 2. Map Showing Arian Pregenzer's Property and Aircraft Ground Tracks



Attachment D

Correspondence with Elaine Kohrman Regarding Air Force Field Trips

April 15 and July 1, 2014

April 15, 2014

Ms. Elaine Kohrman
Forest Supervisor
Cibola National Forest
U.S. Forest Service
2113 Osuna Rd., NE, Ste. A
Albuquerque, NM 87113
ekohrman@fs.fed.us

Dear Ms. Kohrman:

We want to thank the Forest Service and the Air Force for having hosted a fieldtrip to show some of the sites used for ground based training in the Magdalena Ranger District on March 12, 2014. We felt that the field trip was useful in providing insight into a few of the military activities occurring in the area. The field trip also highlighted a number of issues and raised some additional questions that we would like to bring to your attention, including:

- Due to limited time, we were only able to visit a couple of the sites used by the PJs for land-based training.
- There were no representatives from the 58th Airborne, and we were not able to tour the existing or proposed helicopter landing zones (HLZs)
- Neither the Air Force nor the Forest Service was able to account for all the land-based activities that occur in the area. In fact, when discussing previous incidents AF representatives frequently stated “that must have been some other group,” and Dennis Aldridge alluded several times to ground based training by groups from Colorado or Arizona, without being able to specifically say who they were.
- The Forest Service has not conducted surveys for eagles, raptors, and other protected wildlife or vegetation in the area. This is particularly important in the case of eagles since there are significant restrictions of aerial overflights and other activities near active nests.

Based on these points we respectfully request the following:

- An additional field trip with the Forest Service and the Air Force to all other sites used for land based training, and to the existing and proposed HLZs. Air Force officials capable of addressing questions about the range of activities in the Magdalena RD should be present.
- The Forest Service should conduct a thorough survey of eagle populations and active nests in the Bear Mountains and associated watersheds, particularly in riparian areas. This should be accomplished prior to moving ahead on the permit. The same should apply to other protected flora and fauna.
- The Forest Service and the Air Force should provide a full accounting of all military activities in area, including all land-based activities and overflights. We know that you have been working with the Air Force to develop such an understanding, and we urge you to continue to pursue the issue. It is impossible to consider and weigh the potential impacts of a permit without knowing this information. We would also like to request that you provide information about all permits issued by the Magdalena RD (including single day permits) for military training.

We also understand that the Air Force conducts about 5 PJ training courses annually near Magdalena. We request that a schedule of the planned training sessions be published annually, with updates as needed. At the very least, all property owners and interested citizens should be notified one month in advance of such training. This would aid those interested in using the area for recreational purposes to plan their activities well in advance.

Sincerely,

Arian Pregenzer
Property Owner



Ruth Hamilton
Property Owner



Oscar Simpson
State Chair, Backcountry Hunters
& Anglers
Public Lands / Legislative Chair,
Back Country Horsemen of NM



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Cheryl Prewitt, NEPA Officer, Cibola National Forest, cprewitt@fs.fed.us
Dennis Aldridge, Ranger, Magdalena Ranger District, daldridge@fs.fed.us
John Cochran, Public Affairs, Kirtland Air Force Base

July 1, 2014

Ms. Elaine Kohrman
Forest Supervisor
Cibola National Forest
U.S. Forest Service
2113 Osuna Rd., NE, Ste. A
Albuquerque, NM 87113
ekohrman@fs.fed.us

Dear Ms. Kohrman:

Once again we want to thank the Forest Service and the Air Force for having hosted a fieldtrip to the Helicopter Landing Zone on Forest Rd 354N on May 22, 2014. The field trip was useful in providing insight into the types of activities conducted by the 58th Airborne and the National Guard in the Cibola National Forest. Based on the activities we observed, conversations during the field trip, and the Q&A passed out by the Air Force, we have a number of concerns to bring to your attention:

- **Unknown or Unacknowledged Military Activities:** During the field trip we questioned the Air Force about the use of the HLZs or Cunningham Drop Zone to support ground-based training. According to Sgt. Andes, Cunningham Drop Zone has not been used to support the PJs for some time. However, at the HLZ there were lots of small arms cartridges on the ground. They were blanks, but it seemed that large scale ground maneuvers and trainings had been conducted there too. Col. Andreasen and others stated that there is no ground based training associated with the 58th Airborne, and that they did not know the origin of the blanks. They committed to returning to the site for a thorough clean-up. Dennis Aldridge also had no relevant knowledge). The fact that neither the Air Force or the Forest Service can account for these activities is very disturbing. However, the prepared Q&A provided some information about training of the US Marines in the Cibola. None present could provide any details. We would like to know more about this training.
- **Inaccurate / Inconsistent Information about Annual Number of Flights:** We don't yet have accurate information about either the number of existing flights (sorties) or the number proposed. We have been told that the number of flights quoted in the EA was a worst case scenario (2,946 sorties per year at the existing landing zone and 4,378 proposed after construction of 3 new HLZs). When asked about actual numbers on the field trip, Col. Andreasen stated that there would be no more than 300 – 400 flights per year under the proposed action. Both of these statements are inconsistent with the prepared Q&A provided by the Air Force (Q7/A7), which states that the site we visited has about 100 sorties (flights) per year and that this total number will not increase even after three additional HLZs are constructed: each site would then only see about 25 flights per year.
- **Significant Environmental Impact:** On the field trip, we observed the significant environmental impact of the existing HLZ where upwards of 7 acres is reduced to bare rock. We are very concerned with the proposal to build 3 additional landing zones, which, according to the EA, would result in a ten-fold increase in the amount of land reduced to bare rock. When questioned, both Dennis Aldridge and the Air Force spokespersons said that they wanted to "balance" the impact by creating new landing zones. Rather than "balance" the impact, construction of 3 additional landing zones would significantly increase the impact – by a factor

of 10. In addition, we don't understand the need for additional sites if the total number of flights will not increase over current conditions. None of this makes sense to us.

- **Impact of Noise:** A number of those present at the field trip have significant concerns about noise associated with the 58th Airborne and other military flights in the area. When asked about night-flights, the Air Force spokesperson noted that they are usually complete by 1:00 AM. This seems excessive for a populated area.

Based on these points we respectfully request the following:

- Arrange for a field trip with the 4th Reconnaissance Battalion of the US Marine Corps, which also uses the area for ground based training. In fact, the level of training is almost equivalent to that of the PJ/CROs according the prepared Q&A (see Q8/A8). We would like to know whether this group could be responsible for some of the trash and other disturbing activities observed by local residents.
- Provide accurate information about all ground-based military activities in the Magdalena Ranger District (ongoing and over the past 5 years) to account for the acknowledged evidence of military activities unknown to the PJs or the 58th Airborne. The public has a right to this information. If the Forest Service currently does not have access to this kind of basic usage information there should be a requirement for it (and penalties for non-providers) in any future agreement.
- Provide accurate information about the number of flights associated with the existing HLZ as soon as possible and provide an update to the Air Force proposal with accurate numbers of flights under the proposed action.
- Provide accurate information about all other overflights in the Bear Mountains and the surrounding area, including along the Rio Salado. We understand that the FAA is the responsible agency for flights that do not touch ground, but we feel that the Forest Service needs this information in order to evaluate the cumulative impact of the proposed action combined with other activities.
- Do not approve construction of any additional HLZs and move the existing HLZ to military land.
- Discontinue helicopter training (day and night) within 5 miles of houses and other populated areas.

We continue to press for an open and thorough analysis of the suitability and availability of military land for this training. The Air Force rationale for not using White Sands or other military land continues to evolve. In a November 5 Albuquerque Journal article, Lt. Col. Christina Willard, 58th Special Operations Support Squadron commander, is quoted as saying "that training in mountainous areas – as opposed to the relatively lower elevations of Holloman, White Sands and Fort Bliss – is invaluable to Air Force pilots." However, many of us pointed out that the San Andres Mountains, which are completely contained by White Sands Missile Range, is very similar in terrain to the Bears, with even higher elevations and much greater extent. In the prepared Q&A (Q4/A4), it is acknowledged that White Sands meets the suitability criteria, and the criteria for not increasing costs. However, it states that that White Sands is overbooked, and simply cannot work these training missions into their busy schedule. Privately, some in the Air Force acknowledge that such scheduling problems might be solvable if inter-base and inter-service relations were better.

Finally, we would very much appreciate an update on the process of reviewing the Air Force proposal. In particular:

- When will responses to comments be available?
- When will a decision be made about revising the EA or doing a full EIS?
- When will the Air Force Assessment of the suitability and availability of military land for this training be made available?

Thank you very much for your attention.

Sincerely,

Arian Pregenzer
Property Owner



Ruth Hamilton
Property Owner



Sigrid (Nina) McCabe



Judy Calman
Staff Attorney
New Mexico Wilderness Alliance
(505) 843-8696 x 102
judy@nmwild.org

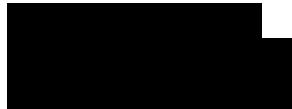
Michael Mideke



Oscar Simpson
State Chair, Backcountry Hunters
& Anglers
Public Lands / Legislative Chair,
Back Country Horsemen of NM



Susan Ostlie
Co-leader of Rio Grande Valley
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John Cochran, Public Affairs, Kirtland Air Force Base
Col. Stephen Andreasen, 58th Airborne

Attachment E

Correspondence with Elaine Kohrman Regarding
Air Force Suitability Assessment of Military Lands

October 22, 2014

October 22, 2014

Ms. Elaine Kohrman
Forest Supervisor
Cibola National Forest
U.S. Forest Service
2113 Osuna Rd., NE, Ste. A
Albuquerque, NM 87113

Dear Ms. Kohrman,

Thank you for forwarding the Air Force's most recent "Suitability Assessment" and for your letter of August 6, 2014. We look forward to seeing revised information about the numbers of flights and noise impacts, as correct numbers are essential to a meaningful Environmental Assessment. Again, we emphasize the need for a complete picture of all land-based and aerial military activity in the area, including activities that are not described by the EA but which significantly impact the area. This is particularly true for low-flying aircraft activity not associated with the HLZs. This information is necessary in order to accurately analyze cumulative impacts.

We remain concerned about conflicting statements about aircraft support of PJ/CRO training and ground-based activities around HLZ-26, and also about inadequate analysis provided by the "Suitability Assessment."

I. Conflicting Statements about Aircraft Support of Land Based Training

During the last field trip, Sgt. Andes stated that the Cunningham Drop Zone has not been used to support the PJs for some time. Your letter also states that there are no ground-maneuvers near HLZ-26. This contradicts information provided in both the EA and the "Suitability Assessment."

The EA states:

Field Training Exercise (FTX) – Training would continue to occur in an area *between HLZ 26 and the Cunningham DZ on the Magdalena RD* (see Figure 2-4). Approximately two hours of training occurs each of four nights per class, beginning at dusk. *Aircraft used to airdrop students and instructors would be MC/HC-130s. After airdrop, students would move in a tactical formation within the FTX area to find a downed pilot, provide medical treatment, and make transport preparations.* Smoke grenades, other pyrotechnics, and blank munitions would be fired sporadically and randomly throughout the FTX area during tactics training. Table 2-4 presents the number of rounds and types of munitions that would be fired. At the end of each tactics training session, instructors

and students would retrieve all brass and empty smoke canisters. All munitions would be used in accordance with prescribed USAF and USFS safety procedures. Sixty percent of the time students and instructors would then be picked up by either CV-22 or HH-60 helicopters at the nearest landing zone. The other 40 percent of the time, they would be driven out by trucks. There would be no overnight use of the Cibola NF by students or instructors for this block of training. Table 2-5 shows approximate acreage and elevations for the PJ/CRO training areas (EA pp. 2-11, emphasis added).

The italicized text clearly states that aircraft are used to support ground based training, and that the area between Cunningham DZ and HLZ 26 is used for training with small arms. Although none of the Air Force officials present on the field trips seemed to have information about these activities, the evidence of small arms training was abundant around HLZ-26.

In addition, the costs of aircraft support for PJ/CRO exercises are included in the “Suitability Assessment.” In fact, the table entitled “Comparison of Cost and Availability Factors for Potential Nearby Training Sites” shows \$100,000 for “Annual flight cost to support PJ/CRO” at the Cunningham / HLZ 26. A copy of this table is included below for your convenience.

 **Comparison of Cost and Availability Factors for Potential Nearby Training Sites**

	Possible Military Training Sites					Existing Training Sites	
	WSMR	Holloman	Cannon	Ft Bliss	HLZ 10	Cunningham / HLZ 26	Grants Corner
Round Trip Distance (miles)	162	288	350	384	56	120	226
Cost for round trip flight	\$27,000	\$48,000	\$58,332	\$64,000	\$9,332	\$20,000	\$37,666
Annual Flight cost to support PJ/CRO	\$135,000	\$240,000	\$291,660	\$320,000	\$46,660	\$100,000	\$188,330
Annual Cost for PJ/CRO Land Travel	\$385,000	\$385,000	\$385,000	\$385,000	N/A	N/A	\$92,500
Total Annual Cost of Training	\$520,000	\$625,000	\$676,660	\$705,000	N/A	N/A	\$280,830
Range/Area Available for Landing Trng	No	No	Yes	No	Yes	Yes	Yes
Range/Area Available for Ground Trng ⁽¹⁾	No	Limited ⁽²⁾ / No	Yes ⁽³⁾	Yes ⁽⁴⁾	N/A	N/A	Yes

NOTES:

Again, consistent information and data is essential to providing an adequate assessment of the potential impacts of these training activities. It will be impossible to evaluate how these exercises will affect forest resources without knowing how many activities are actually taking place and where those activities are occurring.

II. Inadequate Analysis in the “Suitability Assessment”

We find that the “Suitability Assessment” provides little information other than that included in the EA. In fact, it is mostly statements, rather than analysis. A few examples are listed below.

- **Page 1, para 3:** This paragraph contains no more information than the EA (See EA Vol 1, lines 33 - 38 on page 1-1, and pages 2-2 - 2-3.) It is a statement, not an analysis. An analysis would provide information about the exact sites, why they were selected as

alternatives, data relevant to selection criteria (e.g., topographical information, cost of bringing airmen to those locations instead of Kirtland, etc).

- **Page 1, para 4, second sentence:** We do not understand the argument about familiarity. The people being trained come from all over the country and would not be familiar with Kirtland in the first place. Do the same personnel go through the training more than once?
- **Page 1, para 4, fourth sentence:** As before, no evidence is provided to substantiate unavailability of land within the White Sands Missile Range (WSMR). Recall from the data in the EA (page 2-12, Table 2-5) that less than 15,000 acres is required for ground-based training. This is less than 1% of the 3,200 square miles (2,048,000 acres) controlled by WSMR. Is the entirety of the two million acres in use? Would there be ways to coordinate a schedule, since the ground based training only occurs 5 times a year and utilizes a relatively small space? No data is provided on the WSMR schedule, or about possible locations for that training within WSMR. In addition, nothing is stated about the possibility of moving all the HLZs to WSMR.
- **Page 4, Table Comparing Costs:** The description of costs is incomplete and does not mention costs associated with the existing ground-based training locations. To fully evaluate the impact of a change in location, one must know the total budget for PJ/CRO training in the Magdalena Ranger District (MRD), and then the relative difference in cost for moving that training to other sites.
 - We could not find data on the total cost of the PJ/CRO training in FY14, but the FY09 budget was \$12.8M <http://www.saffm.hq.af.mil/shared/media/document/AFD-080204-072.pdf>). Thus, the total annual cost of training at WSMR (\$520,000) would be about 4% of the total training budget. It is impossible to compare to that number to the cost of training in the MRD, because those numbers aren't provided. If it were a \$100k increment it would represent 1% of the FY09 budget.
 - For comparison to other expenses incurred by the Air Force, it is worth noting that each Osprey costs around \$70M <http://defensetech.org/2013/10/18/will-the-army-ever-buy-the-v-22-osprey/>).

Based on these points we respectfully request (over and above previous requests) that USFS provide accurate and complete information about aircraft supported PJ/CRO training activities and ground based training between Cunningham Drop Zone and HLZ-26. We would also appreciate the opportunity to meet the Air Force representatives responsible for this training, perhaps through another field trip.

Additionally, we request that USFS and USAF address the deficiencies in the “Suitability Assessment” as pointed out above. In particular we request: (1) information about the total budget for PJ/CRO training in the Cibola and the current costs of training in the Magdalena Ranger District, so that the impact of the incremental costs of moving these activities can be judged, (2) evidence that 15,000 acres within the WSMR's more than 2,000,000 acres are not

available for ground-based training, and (3) a more vigorous assessment of the suitability of military lands for HLZ-26 and proposed future HLZs, including those issues outlined above.

Finally, we remain convinced that an Environmental Impact Statement is needed to evaluate the impacts of these ground-based military activities. We would also very much appreciate an update on the process of reviewing the Air Force proposal. In particular: When will responses to comments be available? When will a decision be made about revising the EA or doing an EIS?

Thank you very much for your attention to these matters.

Sincerely,

Judy Calman
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Alliance
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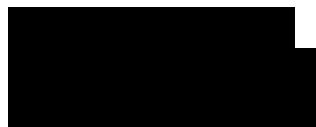
Ruth Hamilton
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Arian Pregenzer
Property Owner


Michael Mideke


Oscar Simpson
State Chair, Backcountry
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Dennis Aldridge, Ranger, Magdalena Ranger District, daldridge@fs.fed.us

John Cochran, Public Affairs, Kirtland Air Force Base

Col. Stephen Andreasen, 58th Airborne

Attachment F

Resolution of Objections to

Draft Decision Magdalena Ranger District Travel Management Plan

July 22, 2015

July 22, 2015

Mr. Cal Joyner
Regional Forester
333 Broadway Blvd. SE
Albuquerque, NM 87102

Sent via email to <objections-southwestern-regional-office@fs.fed.us> with a copy to those designated below.

Dear Mr. Joyner:

Today I met with Margaret Van Gilder, Cheryl Prewitt, Ruth Doyle, and Dennis Aldridge (by phone). I list my original concerns below, with a summary of our discussion in red:

Original Suggestions / Clarifications:

- Taking another look at the treatment of 354E, as it crosses private property. **The designation of 354E as open to all vehicles, even as it crossed private property, was an error.** During our discussion it was confirmed that the Forest Service had no legal access across Mr. Krynnitz' property, and it was agreed to remove the "dispersed camping" designation from all of 354E. **The "decision map" will be corrected accordingly.**
- Moving the start of dispersed camping along 354 farther north to the area around former 354U. **None had any objection to moving the dispersed camping area on 354 north to the intersection with 354U.** Therefore, dispersed camping on 354 will only be allowed from the intersection with 354U north to the FS boundary.

In addition, I'd like clarification on the following:

- Will the roads designated for administrative use only be marked? Will I be permitted access to my property? **Per Forest Service rules, there will not be a special sign designating roads for administrative use only.** The revised MVUM will be the legal designation. The track to my property from 354 (354Q) will be designated "Restricted to Administrative Use Only" on the new map, and thus off limits for use by hunters and campers. After publication of the new MVUM, I will need an easement (Form 299) to access my property. I'll fill out that form and send to Dennis Aldridge. (I'll also note that it is not possible to access my dwelling from the point at which 354O crosses my property on its SE corner, due to two arroyos, absence of road, etc.).
- How will the Forest Service convey rules to grazing permittees? How will compliance with the new rules be monitored and enforced? **After release of the new map, the Forest Service will reach out to the various user communities with information about the changes.** However, the

new MVUM will not specifically apply to grazing permittees. Their access to features such as water tanks and other facilities is governed by their use permit and reviewed annually. However, they do not have *carte blanche* to drive off those roads designated in their permit.

- How will the new TMP affect military activities along 354 (354V and 354 XA, especially). The new MVUM will not directly affect the military. They will have a special use authorization that will designate those areas / roads where they are allowed to drive, train, etc. The EA for Military Training in the Cibola is still under review.

Given these clarifications, I withdraw my objection to the Travel Management Plan for the Magdalena Ranger District. I also urge you to adhere to the new MVUM when considering the military's special use permit. Thank you very much for the opportunity to resolve these issues.

Respectfully,



Arian Pregenzer



Copies:

Elaine Kohrman

Dennis Aldridge

Cheryl Prewitt

Cliff Nichol

Josh Hicks

Judy Calman