FINAL

ENVIRONMENTAL ASSESSMENT FOR THE UPDATE AND IMPLEMENTATION OF THE TOTAL FORCE TRAINING MISSION FOR VISITING UNITS (OPERATION SNOWBIRD, MULTI-SERVICE, AND FOREIGN MILITARY SALES) DAVIS-MONTHAN AIR FORCE BASE, ARIZONA



APPENDIX D
INTERAGENCY/INTERGOVERNMENTAL
COORDINATION AND CONSULTATIONS

Janice K. Brewer Governor

Bryan Martyn Executive Director



Board Members

Walter D. Armer, Jr., Vail, Chair
Maria Baier, State Land Commissioner, Vice Chair
Kay Daggett, Sierra Vista
Alan Everett, Sedona
Larry Landry, Phoenix
William C. Scalzo, Phoenix
Tracey Westerhausen, Phoenix

November 15, 2012

Mr. Kevin Wakefield Natural/Cultural Resource Manager Department of the Air Force 355th Civil Engineer Squadron 5285 E. Madera Street Davis-Monthan AFB, AZ 85707-4927

RE: ANG Training Plan 60-1 Operation Snowbird Project; Tucson – Davis Monthan AFB;

DOD; SHPO-2011-1239 (108813)

Dear Mr. Wakefield:

Thank you for consulting with our office regarding the above referenced project. Pursuant to 36 C.F.R. Part 800, the implementing regulation for Section 106 of the National Historic Preservation Act, we have reviewed the documentation submitted and have the following comments:

- 1. It is our understanding that the United States Air Force (Air Force) proposes to increase the number of Air National Guard (ANG) annual training flights flown at Davis-Monthan AFB from 1,190 to 2,256. Also, the Air Force is preparing an Environmental Assessment to evaluate the potential environmental consequences of the proposed undertaking.
- 2. Thank you for providing a draft copy of the EA for our review. It is the responsibility of the agency to complete cultural resources identification for both NEPA and for Section 106. A brief review of the enclosed NEPA document has indicted that cultural resources were not evaluated because no ground disturbance and/or no construction is anticipated for this project. While we agree that there probably would not be any direct impact to historic properties; we cannot yet know whether the project would have an indirect impact on historic properties. Indirect impacts to historic properties must also be considered when evaluating the potential effects that the federal undertaking may have on historic properties [36 CFR 800.16(d)]. Examples of indirect impacts may include visual impacts, auditory impacts, and vibratory impacts.
- 3. In general, our offices do not comment on EAs, unless the federal agency has elected to conduct their Section 106 consultation requirements as part of NEPA as per (36 CFR Part 800.8) and notified our offices in writing of their intent to do so. Therefore,

we are requesting that the Agency initiate Section 106 consultation on this undertaking with our office.

- 4. In order to facilitate historic preservation compliance reviews, the SHPO has established documentation standards for survey reports, report abstracts, and cover letters. These documentation standards are based in part on guidance provided within the Secretary of the Interior's Standards, the Advisory Council on Historic Preservation publications and policies, 36 C.F.R. §800.11, National Register Bulletins, SHPO guidance on implementing the SHPA, and Arizona State Museum (ASM) rules for implementing the Arizona Antiquities Act A.R.S. §41-841 et seq.
- 5. The SHPO documentation that is required includes a detailed cover letter and an associated cultural resource report. A well-drafted cover letter should state the project undertaking, describe the efforts taken to evaluate whether the proposed project will impact historic properties, provide the eligibility determinations for all cultural resources identified, discuss the efforts taken to consult with Native Americans and other interested groups, provide a project finding of effect (No Historic Properties Affected, Adverse Effect, No Adverse Effect), and provide a request for review and concurrence from the SHPO. A cultural resource report is prepared by a professional, permitted archaeologist and documents that the project area has investigated for cultural resources (either through a records review if the area has already been surveyed, or through a combination of records review and pedestrian survey by a professional, qualified archaeologist).
- 6. In your letter, you indicate that copies of the draft EA were provided to several Native American Tribes. We recommend that you continue your consultation efforts with the tribes under Section 106 also. Please inform us on the results of your tribal consultation efforts this for undertaking.
- 7. At this time, we cannot concur with your finding of No Historic Properties Affected; until the potential for indirect impacts to historic properties has been evaluated.

We are requesting that indirect impacts to cultural resources be evaluated as part of this project and that the EA be revised to include an evaluation of cultural resources. We also request that the appropriate documentation needed for Section 106 consultation with our office be provided (see numbers 4 and 5 above). We look forward to your continued consultation regarding this undertaking. As always, we appreciate your continued cooperation with this office in complying with the historic preservation requirements for federal undertakings. If you have any questions or concerns, then please do not hesitate to contact me via e-mail, kdobschuetz@azstateparks.gov, or by phone, 602-542-7141.

Sincerely,

Kris Dobschuetz, RPA

Compliance Specialist/Archaeologist

Arizona State Historic Preservation Office



DEPARTMENT OF THE AIR FORCE

355TH CIVIL ENGINEER SQUADRON (ACC) DAVIS-MONTHAN AIR FORCE BASE, ARIZONA

355 CES/CEAN 5285 E. Madera St. Davis-Monthan AFB AZ 85707-4927

October 31, 2012

Leigh J. Kuwanwisiwma Director Cultural Preservation Office P.O. Box 123 Kykotsmovi, AZ 86039

Mr. Kuwanwisiwma,

The United States Air Force (Air Force) is preparing an Environmental Assessment (EA) to evaluate the potential environmental consequences of increasing the number of Air National Guard (ANG) annual training flights flown at Davis-Monthan AFB from 1,190 to 2,256. This increased number of sorties represents approximately 7% of the 32,229 total combined numbers of ANG and regular Air Force aircraft sorties flown during the 2009 baseline year.

This letter represents our actions to complete the Section 106 consultation requirements; we have determined that there would be "no adverse effect" to historic properties due to the implementation of the proposed action at Davis-Monthan AFB, the Barry M. Goldwater Range Complex, and associated airspace. Our undertaking does not involve any construction activities or renovations to existing structures. No historic or culturally significant buildings are located near the Snowbird squadron area at Davis-Monthan AFB or associated airspace. As stated in our draft EA document, aircraft operations in the airspace would increase approximately 7% compared to our 2009 baseline year; however, noise level increases would be imperceptible. These changes would be a continuation of existing operations within the area and would not result in a change in setting (either visual or auditory) to any eligible or listed archaeological, architectural, or traditional cultural property. Our draft EA document is available on-line at: http://www.dm.af.mil/shared/media/document/AFD-120730-035.pdf

In addition to contacting your office, the Air Force also provided opportunity for the public to comment on the draft EA through the National Environmental Policy Act (NEPA) process. We considered all of the correspondence received (over 110 pieces), most of which were small e-mails with one or two lines indicating their opposition to

OSB. A few had substantive comments and were quite lengthy; however, none of the comments contained actionable information that alter our finding of no significant impact, or drove the need to re-analyze any parts of the EA.

On 27 July 2012, copies of the draft EA were also sent to the Tohono O'odham Nation and the Pascua Yaqui Tribe, as of today no response has been received. In addition to contacting you and the Hopi Tribe of Arizona, we also sent letters on 31 Oct 2012 requesting Section 106 coordination by certified mail to the Tohono O'odham Nation, the Pascua Yaqui Tribe, the Gila River Indian Community, the Salt River Pima-Maricopa Indian Community, and the Ak-Chin Indian Community.

D-M AFB concurs with the recommendations in the EA and finds that activities would not be expected to impact archaeological or traditional resources; thus, the Agency believes that a No Historic Properties Affected finding is appropriate for this undertaking. Request that the Hopi Tribe of Arizona concur with our findings of no adverse affect. If you have any questions regarding this consultation please contact me at (520)228-4035. If you require any further information about the proposed action/undertaking, please contact our HQ ACC project manager, Mr. Donald Calder at I look forward to your reply.

Sincerely,

Natural/Cultural Resources Manager

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Attachments:

1. Draft EA

Received, 2

Janice K. Brewer Governor

Bryan Martyn Executive Director



Board Members

Walter D. Armer, Jr., Vail, Chair
Mark Brnovich, Phoenix
R. J. Cardin, Phoenix
Kay Daggett, Sierra Vista
Alan Everett, Sedona
Larry Landry, Phoenix
Vanessa Hickman, State Land Commissioner

April 19, 2013

Ms. Angela R. Flores Chief, Asset Management Flight Department of the Air Force 355th Civil Engineer Squadron (ACC) 5285 E. Madera Street Davis-Monthan Air Force Base, AZ 85707-4927

RE: Operation Snowbird Project, Davis-Monthan AFB; DOD; SHPO-2011-1239 (111513)

Dear Ms. Flores:

Thank you for continuing to consult with our office regarding the above referenced project. Pursuant to the 36 CFR Part 800, the implementing regulation for Section 106 of the National Historic Preservation Act, we have reviewed the documentation submitted and have the following comments:

- Thank you for providing us with the cultural resource report as requested in our consultation letter dated November 15, 2012.
- 2. Projects that deviate from the standard procedures used to evaluation potential impacts to historic properties can be complex and difficult. It is because of this difficulty that we especially want to commend you for providing us with a well-organized report that adequately addresses the potential for indirect effects (i.e. visual and auditory) on historic properties. It is refreshing to see documented case studies that support the statements provided in the report.
- 3. We concur with your finding of No Adverse Effect for this project.

We look forward to your continued consultation regarding this undertaking. As always, we appreciate your continued cooperation with this office in complying with the historic preservation requirements for state undertakings. If you have any questions or concerns, then please do not hesitate to contact me via e-mail, kdobschuetz@azstateparks.gov, or by phone, 602-542-7141.

Sincerely,

Kris Dobschuetz, RPA

Compliance Specialist/Archaeologist

Arizona State Historic Preservation Office

2011 = 1239 (121645)/90



DEPARTMENT OF THE AIR FORCE HEADQUARTERS AIR COMBAT COMMAND

JOINT BASE LANGLEY-EUSTIS VA

SEP 2 2 2014

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MEMORANDUM FOR:

James Garrison State Historic Preservation Officer Arizona State Parks 1300 W. Washington Phoenix, AZ 85007

FROM: HQ ACC/A7NS

129 Andrews Street, Suite 102 Langley AFB VA 23665-2769

SUBJECT: Draft Environmental Assessment (EA) for the Proposed Update and Implementation of the Total Force Training Mission for Visiting Units (Operation Snowbird, Multi-Service and Foreign Military Sales) at Davis-Monthan Air Force Base, AZ

- 1. The Air Force and U.S. Army Corps of Engineers (USACE) Sacramento District are soliciting comments on the enclosed draft EA from Federal, state, and regulatory agencies, and the general public. Our draft EA document is available on-line at: http://www.dm.af.mil/library/tftea.asp. We would greatly appreciate your review comments by the end of the 30-day public review, which will start on the date of publication of the Notice of Availability (anticipated to be 22 September 2014) and will end on 22 October 2014.
- 2. The draft EA analyzes potential environmental impacts from the proposal to implement the total force training expansion at Davis-Monthan Air Force Base (DMAFB), AZ. The total force includes visiting Air National Guard (ANG) units, visiting aircraft from other Department of Defense (DoD) services, and visiting from foreign allies of the United States and foreign military sales aircraft. The EA evaluates a Proposed Action, two alternatives, and the no-action alternative.
- a. The Preferred Alternative would increase the number of aircraft sorties flown by visiting units to 2,326.
 - b. Alternative 2 would increase the number of aircraft sorties flown by visiting units to 2,134
- c. The No Action Alternative would maintain the number of visiting units' annual aircraft sorties to the 2009 levels (1,408).

- 3. The US Air Force, sister DoD services, the ANG and foreign allies of the Air Force have an immediate, real-time need to provide trained air crews to support the ongoing combat operations where American and allied forces operate in harm's way. Delays in providing these trained aircrews would be unacceptable to combat commanders relying on trained aircrews to execute their ongoing day to-day missions because they represent unacceptable risk to the lives of other American units depending on their support.
- 4. Again, we would greatly appreciate your comments by 22 October 2014; however, comments received at any time throughout the EIAP process will be considered to the extent possible in the preparation of the EA. Please forward your comments to: ATTN: TFT EA COMMENT SUBMITTAL 355th Fighter Wing Public Affairs, 3180 S. First Street, Suite 1062, Davis-Monthan AFB, Arizona 85707. E-mail comments may be sent to the 355th Fighter Wing Public Affairs office at: 355fw.pa.comment@us.af.mil, with Total Force Training Draft EA Comment Submittal" typed in the subject line.



Chief, Sustainable Installations Branch (A7PS)

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Attachment:

Draft EA for Update and Implementation of the Total Force Mission for Visiting Units



DEPARTMENT OF THE AIR FORCE 355TH FIGHTER WING (ACC) DAVIS-MONTHAN AIR FORCE BASE ARIZONA



Colonel James P. Meger Commander 3405 S. Fifth Street Davis-Monthan AFB AZ 85707

SEP 2 2 2014

Mr. Terry Rambler Chairman San Carlos Apache Tribe Administration P.O. Box "0" San Carlos AZ 85550

Dear Chairman Rambler

The United States Air Force has prepared a draft Environmental Assessment (EA) to evaluate the potential environmental impacts of the number of Total Force Training Mission annual training sorties flown at Davis-Monthan AFB (DMAFB) from 1,408 to 2,326. The increased number of sorties represents approximately 6% of the annual operations flown at DMAFB. Originally this program was called Operation Snowbird but was revised to Total Force Training Mission for Visiting Units to more accurately describe the visiting unit flight operations that occur at DMAFB.

In our previous communications, we received your letter dated 20 June 2014, stating that the San Carlos Apache Tribe concurred with our findings and requested a future face-to-face meeting to discuss future planned activities.

The purpose of this letter is to continue our tribal consultation responsibilities in accordance with Section 106 of the National Historic Preservation Act. The revised draft EA explains and evaluates the aircraft operations and how they compare to our 2009 baseline year. The increase in annual training flights would be a continuation of existing operations within the area and would not result in a change in setting (either visual or auditory) to any eligible or listed archaeological, architectural, or traditional cultural property. As part of the EA process the Air Force commissioned a cultural survey of the affected areas. The survey report titled "The Cultural Resources Report and Section 106 Documentation for the Proposed National Guard Bureau (NGB), Air National Guard (ANG), Training Plan (TP) 60-1" and an Addendum to Annex C of the TP 60-1, the Ramp Management Plan (RMP), at Davis-Monthan Air Force Base (DMAFB), Arizona Operation Snowbird, dated February 2013 was sent out for consultation with the Native American Groups and the Arizona State Historic Preservation Office (SHPO). In the SHPO letter dated 19 April 2013, the SHPO concurred with our finding of No Adverse Effect for this project.

The revised draft EA evaluates the Visiting Units that train at DMAFB including Various ETRIBE units from the Department of Defense (DoD) active forces, National Guard Bureau (NGB), and

GLOBAL POWER FOR AMERICA

SEP 2 9 2014

OFFICE OF CHAIRMAN Foreign Military Sales (FMS) units from foreign partner nations. We evaluated the potential environmental impacts of the proposed action in the new draft EA and found no significant impacts. We value your input regarding any concerns the tribe may have in relation to this proposed action.

I have appointed Mr. Kevin Wakefield, 355th Civil Engineer Squadron, Natural and Cultural Resource Manager, to handle questions dealing with this matter. He can be reached at (520) 228-4035, and his e-mail is kevin.wakefield.1@us.af.mil. For general questions related to Davis-Monthan AFB, please contact the 355th Fighter Wing Public Affairs Office, at (520) 228-3378. If you have any questions about the NEPA process, please contact Mr. Don Calder, HQ ACC NEPA Liaison, at (757)764-6156.

A copy of the draft EA is available electronically at the following web site under the Heading "Draft TFT EA." http://www.dm.af.mil/library/tftea.asp

I am available to discuss your concerns and will have my staff contact your office to arrange a meeting in the near future. I appreciate your continued interest in consulting with the Air Force and the 355th Fighter Wing and look forward to working with the San Carlos Apache Tribe in this process.

Sincerely

JAMES P. MEGER, Colonel, USAF



DEPARTMENT OF THE AIR FORCE 355TH FIGHTER WING (ACC) DAVIS-MONTHAN AIR FORCE BASE ARIZONA

Colonel James P. Meger Commander 3405 S. Fifth Street Davis-Monthan AFB AZ 85707

SEP 2 2 2014

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Sincerely

JAMES P. MEGER, Colonel, USAF



DEPARTMENT OF THE AIR FORCE 355TH FIGHTER WING (ACC) DAVIS-MONTHAN AIR FORCE BASE ARIZONA

Colonel James P. Meger Commander 3405 S. Fifth Street Davis-Monthan AFB AZ 85707

SEP 22 2014

Mrs. Vernelda J. Grant Tribal Historic Preservation Officer Historic Preservation and Archeology Department San Carlos Apache Tribe P.O. Box "0" San Carlos AZ 85550

Dear Mrs. Grant

The United States Air Force has prepared a draft Environmental Assessment (EA) to evaluate the potential environmental impacts of the number of Total Force Training Mission annual training sorties flown at Davis-Monthan AFB (DMAFB) from 1,408 to 2,326. The increased number of sorties represents approximately 6% of the annual operations flown at DMAFB. Originally this program was called Operation Snowbird but was revised to Total Force Training Mission for Visiting Units to more accurately describe the visiting unit flight operations that occur at DMAFB.

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I am available to discuss your concerns and will have my staff contact your staff to arrange a meeting in the near future. I appreciate your continued interest in consulting with the Air Force and the 355th Fighter Wing and look forward to working with the San Carlos Apache Tribe in this process.

Sincerely

JAMES P. MEGER, Colonel, USAF

THE STATE OF ARIZONA

GAME AND FISH DEPARTMENT

5000 W. CAREFREE HIGHWAY PHOENIX. AZ 85086-5000

(602) 942-3000 • WWW.AZGFD.GOV

REGION V, 555 N. GREASEWOOD ROAD, TUCSON, AZ 85745

GOVERNOR JANICE K. BREWER

COMMISSIONERS

CHAIRMAN, ROBERT E. MANSELL, WINSLOW RURT R. DAVIS, PHOENIX EDWARD "PAT" MADDEN, FLAGSTAFF JAMES R. AMMONS, YUMA

JW HARRIS, TUCSON DIRECTOR LARRY D. VOYLES

DEPUTY DIRECTOR

TY E GRAY



September 25, 2014

ATTN: TFT EA COMMENT SUBMITTAL 355th Fighter Wing Public Affairs 3180 S. First Street, Suite 1062 Davis Monthan AFB, AZ 85707

Re: Draft Environmental Assessment for the Proposed Update and Implementation of the Total Force Training Mission for Visiting Units (Operation Snowbird, Multi-Service and Foreign Military Sales) at Davis-Monthan Air Force Base, AZ

Dear Sir or Madam:

The Arizona Game and Fish Department (Department) has received the Draft Environmental Assessment referenced above. The document states that although the Preferred Alternative would increase the number of sorties flown annually, "no additional types of aircraft beyond what is already occurring would be anticipated and the airspace floor altitudes would not change; consequently, wildlife populations would be expected to have become acclimated to the overflights and noise created by the training activities." Further stated, no ground-disturbing activities or construction projects are proposed and thus no impacts on vegetation communities would be expected. Given the absence of ground disturbance or change in types of aircraft operating under this program, the Department has no concerns for wildlife in relation to the proposed action.

Please direct all future correspondence to:

Arizona Game and Fish Department WMHB – Project Evaluation Program 5000 W. Carefree Highway Phoenix, AZ 85086-5000

Sincerely.

Kristin Terpening

Habitat Specialist, Region V

cc: Project Evaluation Program AGFD



GILA RIVER INDIAN COMMUNITY

POST OFFICE BOX 2140, SACATON, AZ 85147

TRIBAL HISTORIC PRESERVATION OFFICE

(520) 562-7162 Fax: (520) 562-5083

September 30, 2014

Colonel James P. Meger, Commander Department of the Air Force 355th Fighter Wing (ACC) 3405 S. Fifth Street Davis-Monthan Air Force Base, Arizona 85707

RE: Section 106 Consultation Draft Environmental Assessment (EA) Total Force Training Mission Annual Training Sorties, Davis-Monthan Air Force Base (DMAFB), Tucson, Arizona

Dear Colonel Meger,

The Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO) has received your consultation document dated September 22, 2014. The documents describe a DMFAP plan to increase the number of training sorties for the Total Force Training Mission (TFTM). The DFMAP undertaking was originally named Operation Snowbird with a proposed number of training sorties set at 1,408. The revised plan for the TFTM is to increase the number of training sorties to 2,326. The DMFAP will not be conducting any ground disturbance activities while conducting the TFTM. The Davis Monthan AFB has made a determination of no adverse effect for the undertaking. The consultation documents indicate that the Arizona State Historic Preservation Office concurred with a finding of no adverse effect for this undertaking in February 2013.

The GRIC-THPO concurs with a finding of no adverse effect for the undertaking. We request a copy of the survey reports and addendums for our records. The proposed project area is within the ancestral lands of the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'Odham Nation). The GRIC-THPO defers to the Tohono O'Odham Nation as lead in the consultation process.

Thank you for consulting with the GRIC-THPO on this project. If you have any questions please do not hesitate to contact me or Archaeological Compliance Specialist Larry Benallie, Jr. at 520-562-7162.

Respectfully,

Barnaby V. Lewis

Tribal Historic Preservation Officer Gila River Indian Community

RON BARBER
2ND DISTRICT, ARIZONA

COMMITTEES:
HOUSE ARMED SERVICES
TACTICAL AIR AND LAND FORCES
READINESS

HOMELAND SECURITY

OVERSIGHT AND MANAGEMENT
EFFICIENCY, RANKING MEMBER

SMALL BUSINESS
ECONOMIC GROWTH, TAX AND
CAPITAL ACCESS
AGRICULTURE, ENERGY AND TRADE

Congress of the United States House of Representatives

Washington, **BC** 20515-0302

WEBSITE: www.barber.house.gov

October 24, 2014

1029 LONGWORTH HOUSE OFFICE BUILDING WASHINGTON, DC 20515 PHONE (202) 225–2542 FAX (202) 225–0378

TUCSON OFFICE:

3945 E. FORT LOWELL, SUITE 211 TUCSON, AZ 85712 PHONE (520) 881–3588 FAX (520) 322–9490

SIERRA VISTA OFFICE

77 CALLE PORTAL, SUITE 8-160 SIERRA VISTA, AZ 85635 PHONE (520) 459-3115 FAX (520) 459-5419

FACEBOOK:

facebook.com/RepRonBarber

TWITTER: twitter.com/RepRonBarber

ATTN: TFT EA COMMENT SUBMITTAL 355th Fighter Wing Public Affairs 3405 S. Fifth Street Davis-Monthan AFB, AZ 85707

I am writing in response to the release of the Draft Environmental Assessment for the Total Force Training Mission for Visiting Units by the United States Air Force and to express my support for the expansion of the mission at Davis-Monthan Air Force Base. As the Air Force considers implementing a year-round training mission at Davis-Monthan, public input is essential. I urge the Air Force to carefully listen to the voices of our community and to their comments.

Davis-Monthan has been the home of military operations in Tucson for more than 70 years. The installation infuses nearly \$1 billion into our local economy every year. A recent study has shown strong public support for the continuing presence of the units at Davis-Monthan. This is not surprising as Southern Arizona is home to a broad defense industry and one of the nation's largest military and veteran communities, including the 162nd Wing of the Air National Guard, Fort Huachuca, Yuma Proving Ground, Marine Corps Air Station Yuma, the Barry M. Goldwater Range, the Navy Operational Support Center and the 1-285th Attack/Reconnaissance Battalion at Silverbell Army Heliport.

The draft Environmental Assessment found that an expansion of the mission at Davis-Monthan Air Force Base would have no significant impacts on noise, air quality, climate, public safety or transportation around the base. Additionally, the assessment finds that the increased training will help build and maintain readiness in the Air Force and in our partnerships with allied forces. This is especially needed given the growing instability worldwide. While these findings were supportive of the mission, I take seriously the concerns about any unintended effects that this expansion could have on the community surrounding DM and am committed to working together to mitigate any issues that might arise.

I am grateful for the exceptional work of the service members based at Davis-Monthan Air Force Base and Tucson International Airport and I am proud that this Total Force Training Mission will call Southern Arizona home. With our optimal weather, exceptional flying conditions and close proximity to training ranges, Southern Arizona is the logical choice for the Air Force to continue to build missions for our national air defense.

I remain committed to working with the Air Force to support its mission and our shared goal of a strong and ready national defense.

Sincerely,

Ron Barber

Member of Congress



JANICE K. BREWER

October 22, 2014

EXECUTIVE OFFICE

General Gilmary Michael Hostage III Commander, Air Combat Command C/O: TFT EA COMMENT SUBMITTAL 355th Fighter Wing Public Affairs 3405 South Fifth Street Davis-Monthan AFB, Arizona 85707

Dear General Hostage:

The State of Arizona is pleased to learn that, in accordance with the National Environmental Policy Act, the Environmental Assessment for the Total Force Training Mission at Davis-Monthan Air Force Base found no significant impacts on Southern Arizona's residents or natural environment. I commend the United States Air Force and Davis-Monthan Air Force Base for their efforts to be good stewards of the environment and good neighbors within our communities.

Arizona fully supports Davis-Monthan and is proud that the facility is an ideal training location for visiting United States military and partner nation flying units. Few locations in the country can compete with Arizona's optimal flying weather and vast surrounding airspace available to military training activities. The support infrastructures at the base, in addition to its proximity to the Barry M. Goldwater Range, further contribute to the ideal conditions inherent to Arizona. We welcome soldiers, sailors, airmen and Marines from around the globe.

While the Total Force Training Mission, under the preferred alternative, accounts for approximately six percent of the base's total number of airfield operations, we support all flying missions at Davis-Monthan and we look forward to working with the United States Air Force to sustain the base for decades to come. We know Southern Arizona residents share solidarity to that commitment. A recent survey commissioned by the Southern Arizona Defense Alliance indicated that more than 90 percent of Southern Arizonans support the region's military bases, with 75 percent who expressed "strong" or "very strong" support.

Arizona aspires to strengthen its position as America's military aviation center of excellence. To that end, we support the Total Force Training Mission as well as all other current and future flying missions at Davis-Monthan. Arizonans are united to ensure America's armed forces, and those of our partner nations, remain a ready and capable combat force to deter aggression and defend freedom in this turbulent global environment.

Sincerely,

Janice K. Brewer

Governor

ANARCH 3, 1888

United States Department of the Interior

NATIONAL PARK SERVICE

Saguaro National Park 3693 South Old Spanish Trail Tucson AZ 85730



IN REPLY REFER TO: L7616

November 20, 2014

TFT EA Comment Submittal 355th Fighter Wing Public Affairs 3405 S Fifth Street Davis-Monthan AFB, Arizona 85707

To Whom It May Concern,

The U.S. Air Force's proposed Total Force Training program and draft Environmental. Assessment (EA) have just come to our attention. We appreciate the extended comment period so that we have the opportunity to comment on this proposed action and EA. Davis-Monthan Air Force Base (DMAFB) is located about five miles west of Saguaro National Park's (SNP) Rincon Mountain District (RMD), and about ten miles southeast of its Tucson Mountain District (TMD). As neighbors of DMAFB and managers/guardians of unique natural and cultural resources, recreational opportunities, and designated wilderness, we are very much interested in and affected by actions on, and originating from the base. We were unable to locate the distribution list in Appendix A as mentioned on page 1-7 of the EA; however, if we are not already, we request to be added to your mailing list for future communications.

The pressures exerted on park resources and values from increasing development around the park include degradation of scenic viewsheds, night-skies, wilderness, soundscapes; and integrity of the native Sonoran desert ecosystem, including wildlife habitat and connections to other protected natural areas. These potential impacts are direct and indirect, and cumulative. With each new development or human activity nearby or over the park, we become increasingly concerned that the resources and values the park was established to protect will become irreparably compromised. Our concerns regarding the current proposed action are primarily related to noise and air quality issues.

Aircraft noise can have significant effects on natural resources, particularly wildlife, and on wilderness values. The noise analyses cited in the EA appear to be limited to the Tucson Basin, and potential impacts, including cumulative impacts, to wildlife are summarily dismissed (pg 3-3). It would be useful for the document to identify the areas that would receive increased overflights, as well as the type of aircraft and elevation at which they would be flying over these areas.

Potential noise impacts to designated wilderness areas, which surround DMAFB and Tucson, and include most of the land in both districts of Saguaro National Park, are not specifically considered either. Table 3-2 does not define the land use categories used or provide local examples, but indicates that "additional evaluation is warranted" for noise zones over 70 dB for "recreational activities," which appears to best fit the intent of designated wilderness.

Furthermore, Figure 2-3 in (draft?) Appendix C provides a sound level of 40 dBA for rural background noise, which would be the closest approximation to that expected for wilderness. Flight routes and noise contours are depicted only next to the base, though their trajectories indicate they may fly over or near Saguaro National Park, particularly the Tucson Mountain District. Since visitors regularly complain to staff about noise from military overflights, we request designated wilderness be **addressed** in the EA. Specifically, how the USAF and U.S. Air National Guard are committed to respecting national park and wilderness values by flying 2,000' above ground level as prescribed by the Federal Aviation Administration's Advisory Circular 91-36C, as well as providing a point of contact for reporting violations of these guidelines.

Saguaro National Park is a Class 1 airshed granted special air quality protections under Section 162(a) of the federal Clean Air Act. Per 40 CFR Section 51.307, the operator of any new major stationary source or major modification located within 100 kilometers of a Class I area is required to contact the federal land management areas for those areas (i.e., Saguaro National Park and Coronado National Forest). The air quality analyses in the EA are difficult to interpret, specifically between standards, and the contributions of various sources. In addition, we believe the proposed Rosemont Copper Mine in the Santa Rita Mountains should be considered in section 5.1.2 as a federal project that could contribute significant cumulative impacts to air quality in the area.

We request to be informed as this process moves forward. Maintaining the integrity of the Sonoran desert, spectacular night sky resources, scenic views, and the iconic vegetation and wildlife that bring people from all over the world to our community, as residents and visitors, is integral to maintaining the economic drivers of this area. Saguaro National Park is a major contributor to these values, and we hope to limit impacts to park resources. Thank you for considering our comments and concerns. If you have any questions regarding our comments, please contact Chief of Science and Resource Management, Scott Stonum (scott stonum@nps.gov; 520.733.5170) or Biologist, Natasha Kline (natasha_kline@nps.gov; 520.733.5171).

Sincerely,

Darla Sidles Superintendent



November 24, 2014

CITY OF TUCSON OFFICE OF THE CITY MANAGER United States Air Force ATTN: TFT EA COMMENT Submittal 355th Fighter Wing Public Affairs 3180 S. First Street, Suite 1062 Davis-Monthan AFB, Arizona 85707

Re: Comment Submittal for Total Force Training Draft Environmental Assessment

The City of Tucson appreciates the opportunity to review the Environmental Assessment for Davis-Monthan Air Force Base's Total Force Training Mission. Davis-Monthan Air Force Base (DMAFB) resides within the City's boundaries, and the City continues to look to DMAFB as a partner in assuring the public health, safety and welfare of our residents.

In February 2013, Mayor and Council adopted Resolution No. 22006 supporting the mission and long-term viability of DMAFB. In November 2013, the voters approved *Plan Tucson*, the City's General and Sustainability Plan, which recognizes that DMAFB has been an integral asset and partner to the City. In light of the Mayor and Council Resolution and *Plan Tucson*, City staff reviewed the potential impacts related to noise, air quality, socio-economics, public safety and cultural resources listed in the Environmental Assessment (EA). Given the two options presented by the United States Air Force, the City supports the Preferred Alternative of the Total Force Training Mission for Visiting Units (Operation Snowbird, Multi-Service, and Foreign Military Sales).

As indicated in the EA, DMAFB will minimize nighttime operations and continue to take off and land to the southeast, away from heavily-populated areas. The City will continue to work collaboratively with DMAFB to maintain safety protocols in sensitive areas. It is expected that the noise areas referenced in the EA will have a minimum impact on property values.

City zoning regulations from the Unified Development Code (UDC) create the Airport Environs overlay zone that supports the DMAFB activities. The Airport Environs Zone (AEZ) was adopted into the UDC on April 16, 1990. The City's Planning and Development Services Department administers AEZ regulations in the vicinity of DMAFB. The AEZ establishes a boundary around DMAFB within which land uses compatible with military flight operations are allowed. Within the AEZ, acoustical treatment of buildings is required to reduce exposure to high levels of noise generated by aircraft as well as restricted land uses in defined approach/departure corridors that reduce the likelihood of accidents in populated areas.

In 2004, the United States Department of Defense completed the Joint Land Use Study (JLUS) for DMAFB to address noise, land use compatibility, and safety issues related to airports. The preparation of the JLUS included the Arizona Department of Commerce, as well as, representatives from the business community, property owners, Pima County, the City of Tucson, DMAFB, and Tucson International Airport. The JLUS resulted in the Mayor and Council adopting amendments to the AEZ related to the noise contours, accident potential zones, and approach-departure corridors for DMAFB. The additional training and aircraft discussed in the EA can operate within the current framework of the AEZ and will not have an added impact on the surrounding residential areas. Additionally, the TFTM will have no adverse impact on historic structures, as indicated in the EA.

Plan Tucson recognizes that DMAFB continues to be a significant contributor to the local economy with a workforce of 12,700 military and civilian personnel. Besides being a regional economic force, DMAFB is a national training and technology center attracting participants from all over the world. Further, DMAFB is a vital part of Southern Arizona's emergency services, and a strong supporter of community activities. Plan Tucson's policies support the base by encouraging compatible land uses around DMAFB and support military and aviation operations.

The Preferred Alternative in the Environmental Assessment is compatible with the Mayor and Council Resolution supporting DMAFB, *Plan Tucson* and the City's AEZ regulations regarding noise, air quality, socioeconomic, and cultural resources. The City concurs with the analysis within the EA and supports the Preferred Alternative of the Total Force Training Mission for Visiting Units to be conducted and implemented at the Davis-Monthan Air Force Base.

Sincerely,

Martha M. Durkin,

City Manager

C: Honorable Mayor and Council Members
Albert Elias, Assistant City Manager
Kelly Gottschalk, Assistant City Manager and Chief Financial Officer
Ernie Duarte, Director of Planning and Development Services
C.H. Huckelberry, Pima County Administrator



Salt River PIMA-MARICOPA INDIAN COMMUNITY

10005 EAST OSBORN ROAD/SCOTTSDALE, ARIZONA 85256/ PHONE (480) 362-6325

Cultural Preservation Program

December 8, 2014

Kevin Wakefield US Dept. of the Air Force-355th Civil Engineer Squadron (ACC) 3405 S. Fifth St Davis-Monthan AFB AZ 85707

RE: SRP-MIC Response to Environmental Assessment Davis-Monthan AFB (DMAFB)

Dear Mr. Wakefield,

The Salt River Pima-Maricopa Indian Community (SRP-MIC) is a federally recognized tribe with consultation rights under Section 106 of the National Historic Preservation Act (NHPA). This correspondence is in reference to Environmental Assessment (EA) Davis-Monthan AFB (DMAFB), the revised draft EA evaluates the visiting Units that train at DMAFB including various units from the Department of Defense active forces, National Guard Bureau, and Foreign Military Sales units from foreign partner nations.

The SRP-MIC is in receipt of your consultation request and appreciates the opportunity to comment on this project. The location of this project area is within the adjudicated ancestral claims area of the Four Southern Tribes of Arizona (SRP-MIC, Gila River Indian Community, Ak-Chin Indian Community and the Tohono O'Odham Nation.) The Four Southern Tribes of Arizona (Four Tribes) have an existing consultation management agreement to address consultation within the adjudicated ancestral claims area that divides the area into four geographic regions where one of the Four Tribes takes the lead and provides all Section 106 consultation and all other federal, state, or local statutes as necessary for specific areas on behalf of all of the Four Southern Tribes of Arizona. The Four Tribes in consensus agreed that the Tohono O'odham Nation will take the lead in providing comments in for this project.

If construction plans deviate from the planned activities, or if human remains or any type of cultural resources are observed in the area, stop construction immediately, secure the area, and notify the Tohono O'odham Nation. Thank you for your patience and consideration in this matter. Please contact me at 480.362.6627 or email Matthew.Garza@srpmic.nsn.gov with additional questions or comments in regard to this or any other cultural resource issue.

Sincerely,

Matthew Garza

SRP-MIC NAGPRA Coordinator

Matthews Juga.

AK-CHIN INDIAN COMMUNITY

Community Government





January 7, 2015

Colonel James P. Meger, Commander 3405 S. Fifth Street Davis-Monthan AFB, AZ 885707

RE: Draft Environmental Assessment to evaluate potential impacts of Total Force Training Mission annual training sorties flown at Davis-Monthan AFM from 1,408 to 2,326.

Dear Colonel Meger:

The Ak-Chin Indian Community in regards to the draft Environmental Assessment to evaluate potential impacts of Total Force Training Mission annual training sorties flown at Davis-Monthan AFM from 1,408 to 2,326 will defer comments and questions to the Tohono O'Odham Nation Tribal Historic Preservation Officer, Mr. Peter Steere.

The O'Odham are one cultural group consisting of four federally recognized tribes (also known as the Four Southern Tribes of Arizona) – the Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and Tohono O'Odham Nation. However, due to the location of the project will defer to the Tohono O'Odham Nation.

The Ak-Chin Indian Community acknowledges Davis-Monthan Air Force for providing the information to our community on your project. For further inquiries, please contact Mrs. Caroline Antone, Manager of Ak-Chin Cultural Resources at 520-568-1372 or 520-568-1363. Thank you.

Sincerely,

Louis J. Manuel, Jr., Tribal Chairman

Ak-Chin Indian Community

cc: Four Southern Tribes

From: WAKEFIELD, KEVIN L GS-09 USAF ACC 355 CES/CEIE

To: CALDER, DONALD W JR GS-13 USAF HQ ACC A7/A7NS; Chris Ingram

Cc: WAKEFIELD, KEVIN L GS-09 USAF ACC 355 CES/CEIE; DEUTSCH, KARL R GS-12 USAF ACC 355 CES/CEIA;

FLORES, ANGELA R GS-13 USAF ACC 355 CES/CEI

Subject: TFT Consultation Follow-up

Date: Wednesday, January 07, 2015 8:35:23 AM

Attachments: RE Total Force Training Environmental Assessment (EA) Follow-up (2.83 KB).msg

On 6 Jan 2015 follow-up emails were sent tribes we are waiting to receive letters from.

Christopher Coder from the Yavapai-Apache Nation responded stating that they had no comment in the attached email and to use the email as our documentation.

This leave only the Ak-Chin Indian Community and White Mountain Apache Tribe that still owe us a letter or email confirmation. Telephone follow-up will be conducted today.

Still no response from the Pascua Yaqui Tribe. Telephone follow-up will be conducted today.

Still working the meeting with the Tohono O'odham Nation.

Kevin L. Wakefield Cultural and Natural Resources Manager 355 CES/CEAN COMM 520-228-4035 DSN 228-4035

From: WAKEFIELD, KEVIN L GS-09 USAF ACC 355 CES/CEIE

To: Chris Ingram; CALDER, DONALD W JR GS-13 USAF HQ ACC A7/A7NS

Cc: FLORES, ANGELA R GS-13 USAF ACC 355 CES/CEI; DEUTSCH, KARL R GS-12 USAF ACC 355 CES/CEIA;

WAKEFIELD, KEVIN L GS-09 USAF ACC 355 CES/CEIE

Subject: FW: Consultation Letter Total Force Training Environmental Assessment

Date: Wednesday, January 28, 2015 2:56:14 PM

Just got this email from the White Mountain Apache Tribe, they are deferring to the Tohono O'odham Nation.

Update: We have received email or hard copy letters from 7 of the 9 Native American Groups, the Pascua Yaqui Tribe did not respond to any contact, we closed them out on 26 Jan 2015. We are still working consultation with the Tohono O'odham Nation.

Kevin L. Wakefield Cultural and Natural Resources Manager 355 CES/CEIE COMM 520-228-4035 DSN 228-4035

----Original Message----

From: Ramon Riley [mailto:rileyhali41@gmail.com] Sent: Wednesday, January 28, 2015 1:22 PM

To: WAKEFIELD, KEVIN L GS-09 USAF ACC 355 CES/CEIE

Subject: Re: Consultation Letter Total Force Training Environmental Assessment

Mr. Wakefield,

This is to informed you that we are 200 air miles away from the total force training area therefore, as the Cultural Resource/NAGPRA representative for the White Mountain Apache Tribe I am deferring this to the tribe of that area which is Tohono O'Odham Nation.

If you have any other questions on this matter, please feel free to contact me at (928)338-4625. I am sorry but I emailed you back the same day for some reason it did not go through.

Ramon Riley, Cultural Resource/NAGPRA Representative

White Mountain Apache Tribe.

Fort Apache, Arizona

On Wed, Jan 28, 2015 at 12:00 PM, WAKEFIELD, KEVIN L GS-09 USAF ACC 355 CES/CEIE kevin.wakefield.1@us.af.mil wrote:

Hello Mr. Riley, it's been several weeks since we last talk. I have not received your letter stating the White Mountain Apache Tribe will defer to the Gila River Indian Community for the Total Force Training Environmental Assessment.

We would like to close our consultation with the White Mountain Apache Tribe by the end of the week if possible.

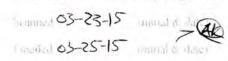
You can forward the letter by email.

Thanks again,

Kevin L. Wakefield Cultural and Natural Resources Manager 355 CES/CEIE COMM 520-228-4035 DSN 228-4035



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SAN CARLOS APACHE TRIBE Historic Preservation & Archaeology Department P.O. Box 0

San Carlos Arizona 85550 Tel. (928) 475-5797

Tribal Consultation Response Letter

Date: 03/05/15 Attn: Kevin, wakefield. 1e
Date: 03/05/15 Contact Name: James P. Meger, Colonel, USAF Company: Dept of the Arrforce Address: 355th Fighter Wing (Aec) Project Name/#: Davis Monthan fin Force Basey Arizona
Under Section 106 and 110 of the National Historic Preservation Act, we are replying to the above referenced project. Please see the appropriate marked circle, including the signatures of Vernelda Grant, Tribal Historic Preservation Officer (THPO), and the concurrence of the Chairman of the San Carlos Apache Tribe:
NO INTEREST/NO FURTHER CONSULTATION Sign & date) I have determined that there is not a likelihood of eligible properties of religious and cultural significance to the San Carlos Apache Tribe in the proposed project area.
CONCURRENCE WITH REPORT FINDINGS & THANK YOU VICTORIAN (sign & date)
REQUEST ADDITIONAL INFORMATION VALUE (sign & date) 03/05/15 I require additional information in order to provide a finding of effect for this proposed undertaking, i.e. Project description Map Photos X Other Please accept this letter although
NO EFFECT Street date of the being returned fast consultation of the san Carlos Apache Tribe that are listed on the National Register within the area of potential effect or that the proposed project will have no effect on any such properties that may be present.
O NO ADVERSE EFFECT (sign & date) Properties of cultural and religious significance within the area of effect have been identified that are eligible for listing in the National Register for which there would be no adverse effect as a result of the proposed project.
O ADVERSE EFFECT (sign & date) I have identified properties of cultural and religious significance within the area of potential effect that are eligible for listing in the National Register. I believe the proposed project would cause an adverse effect on these properties. Please contact the THPO for further discussion.
STIPULATION: We were taught traditionally not to disturb the natural world in a significant way, and that to do so may cause harm to oneself or one's family. Apache resources can be best protected by managing the land to be as natural as it was in pre-1870s settlement times. Please contact the THPO, if there is a change in any portion of all previously discussed projects. Thank you for contacting the San Carlos Apache Tribe, your effort is greatly appreciated.
CONCURRENCE: But the Tribal Chairman Date
CONCURRENCE: Terry Rambler, Tribal Chairman Date

Ticia Bullion

From: Peter Steere <Peter.Steere@tonation-nsn.gov>

Sent: Monday, March 30, 2015 4:36 PM

To: WAKEFIELD, KEVIN L GS-09 USAF ACC 355 CES/CEIE

Cc: Lanez Valisto

Subject: Total Force Training Mission Enivironmental Assessment

MEMORANDUM

DATE: March 30, 2015

TO: Kevin Wakefield, Cultural and Natural Resources Manager

Davis-Monthan Air Force Base

355 CES/CEIE, COMM 520-228-4035 DSN 228-4035

Tucson, Arizona

CC: Lanez Valisto, Government Affairs Assistant, Tohono O'odham

Nation

FROM: Peter L. Steere, Tribal Historic Preservation Officer

RE: Draft Environmental Assessment for Total Force Training Mission Annual

Training Sorties

Flown at David-Monthan AFB (DMAFB)

Thank you for consulting with the Tohono O'odham Nation on the Environmental Assessment Prepared by the United States Air Force for the Total Force Training Mission.

The Tribal Historic Preservation Office believes that there will be "no adverse effects" on cultural resources located on the lands of the Tohono O'odham Nation from Total Force Training Overflights.

The only possible "adverse effects" to on-the-ground cultural sites would be if a United States Air Force plane crashed on the Tohono O'odham Nation. While this is an unlikely occurrence, it has happened in the past and in one case an on-the-ground cultural site was damaged.

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In the unlikely event of a United States Air Force plane crash on the Tohono O'odham Nation, the Tribal Historic Preservation Office should be contacted to evaluate the on-the ground crash site to see if any cultural resources were damaged.

It is my understanding that on February 5, 2015, Chairman Ned Norris had a telephone conversation with Colonel Meger on the United States to discuss overflight issues.