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# MEMORANDUM

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Date: October 8, 2014

To: The Honorable Chair and Members  
Pima County Board of Supervisors

From: C.H. Huckelberry  
County Administrator 

Re: **Federal Environmental Assessment for Davis-Monthan Air Force Base's Total Force Training Mission**

## Introduction

The US Air Force began a 30-day public comment period on September 24, 2014 for a revised draft of the Total Force Training Environmental Assessment (EA), a federally mandated analysis of potential environmental impacts and options related to specific flight exercises, training and other activities conducted at Davis-Monthan Air Force Base. The Total Force Training operations, which include Operation Snowbird, involve the training of visiting airmen from allied foreign nations and other units from different branches of the US military, including active duty, National Guard and reserve units. The host unit for the training is the 162<sup>nd</sup> Fighter Wing of the Arizona Air National Guard, which has supported the program since 1975. Air operations are also supported by the Air Force's 355<sup>th</sup> Fighter Wing based at Davis Monthan.

In the 39 years these training missions have occurred, thousands of pilots and other military personnel have traveled to Davis-Monthan and received high-level instruction that supports critical aspects of US military and allied nations' defense preparations. The program is unique to our area and is made possible by our ideal climate for air operations, open desert and the presence of facilities such as Davis-Monthan, the 162<sup>nd</sup> Fighter Wing at Tucson International Airport and a number of nearby Military Operation Areas, including the Barry M. Goldwater Gunnery Range west of Ajo. The Air Force considers Operation Snowbird and the Total Force Training operations critical to the nation's military readiness, and the year-round training has served as important preparation for the military's most recent engagements in Afghanistan and Iraq.

Threats to the operation of Davis-Monthan, most recently the proposed retirement of the A-10 and the continuing effects of federal sequestration, have created uncertainty about the Base's future. It is important that the Environmental Assessment for Total Force Training be examined objectively and thoroughly. Davis-Monthan is the third largest employer in Pima County and has more than \$1.4 billion in total impact on our economy.

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The most recent economic impact report provided by Davis-Monthan indicates the Base provides jobs for more than 7,500 military personnel with a \$408 million payroll. Approximately 4,400 additional jobs are created or supported that provide a payroll of \$187 million in the community. Approximately 3,000 civilian employees and contractors provide a \$145 million payroll and have accounted for the purchase of \$232 million in construction material and supplies. No less important are the 19,000 military retirees in Pima County, many of whom have chosen to live here because of Davis-Monthan.

Pima County has long supported Davis-Monthan in its mission. In March, the Board of Supervisors approved a resolution supporting the Base, including "any new missions, flying or otherwise. Pima County is an active participant in the DM-50, the Southern Arizona Defense Alliance and other organizations that support Davis-Monthan. Pima County voters approved spending \$10 million, which was used to acquire land and protect the Base's flight corridors and prevent urban encroachment. Pima County has provided millions of dollars in infrastructure for Davis-Monthan since its inception as an active military base in 1941.

#### Environmental Assessment

The revised draft Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) by the US Air Force Air Combat Command and the US Army Corps of Engineers Sacramento District. The document released September 24 is a revision of an initial draft EA (*"The Proposed Update and Implementation of the National Guard Bureau Training Plan 60-1 in Support of Operation Snowbird, Davis-Monthan Air Force Base, Arizona"*) that was released for public comment in July 2012. After receiving public comments and a review of the initial draft by the US Air Force Air Combat Command, 355<sup>th</sup> Fighter Wing and the National Guard Bureau, the document was revised, expanded and renamed (*"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"*) to more accurately reflect visiting units' flight activities and the changing priority to integrate training activities for all Department of Defense agencies and our international partners.

The current assessment evaluates the environmental effects of the Total Force Training program on the community in broad categories that include noise, air quality, public safety, socioeconomics and cultural resources. The aircraft expected to be utilized in Total Force Training under the preferred alternative are aircraft that have flown in our region previously. The primary aircraft expected to participate in the exercises are the F-16 and A-10. However, other US aircraft that may also participate include F-15, F/A-18 E/F, F-22, MC-12, C-127, AV-8, MV-22 and C-130. International aircraft expected to participate include EF Typhoon, GR-4 Tornado, F-21 Kfir, Mirage 2000 and Rafale. Helicopters

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expected to participate under this alternative would include HH-60G, UH-60, AH-1W, UH-1Y, CH-53E and EC-725.

The revised EA's proposed actions include two alternatives to the current training operations that would result in expansion of air operations, as well as a "No Action Alternative" that would maintain the program as operated at the established baseline of training conducted during the 2009 program.

The EA's preferred alternative (Alternative 1) includes a finding of no significant impact to the human and natural environment. This alternative proposes 2,326 annual sorties (a sortie equating to one aircraft launch and one landing, as well as cargo support.) Although this alternative would increase the annual sorties by 65 percent (compared to the No Action Alternative of 1,408 sorties), it is important to note that the number of annual sorties proposed in Alternative 1 represent only 5 percent of the total annual air operations conducted at Davis-Monthan.

Alternative 2 would result in a slightly reduced number of sorties (2,134) by reducing the amount of operations related to Foreign Military Sales. This reduction results in 9 percent fewer sorties than the preferred alternative and a 52 percent increase in sorties when compared to the 2009 baseline (1,408 sorties) contained in the No Action Alternative. Similar to Alternative 1, the increased operations represent an even smaller increase in the number of sorties conducted.

The EA finding of no significant impact for both of the alternatives is important to note. The alternative with the most sorties and potential impact (Alternative 1) included the following summary of environmental consequences:

*"No impacts were identified regarding land use, climate, geology, soils, water quality and supply, wetlands, fish and wildlife populations, transportation and public services. Insignificant impacts would be incurred on noise, air quality, socioeconomics (including property values), public safety and cultural resources...The Arizona State Historic Preservation Office has concurred with the Air Force's determination of no adverse effects on historic properties, under Section 106 of the National Historic Preservation Act. However, on-going Section 106 consultation with Native American Tribes is continuing. Section 106 consultation regarding cultural resources has been completed. The No Action Alternative would result in no change to existing conditions."*

The EA, as noted, does determine that there are impacts related to noise, air quality, socioeconomics, public safety and cultural resources; but all were determined to be insignificant. For example, the EA found that, on average, less than 100-foot expansion to

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the 65-decibel and 70-decibel Day/Night Level noise contours for each of the two action alternatives in areas southeast and northwest of the Base. In the northwest contour, 128 additional residences would be located in the lower, 65 to 69-decibel contour.

To better understand these impacts on the health, safety and welfare of Pima County residents, and to provide objective information to the Board of Supervisors and the community prior to the close of the public comment period on October 23, 2014, I have directed County staff to evaluate the EA.

Comments related to the materials presented and the actual Finding of No Significant Impact:

Pima County has expertise in several of the areas included in the analysis and concurs with the findings in the following areas:

1. Noise. This is an important factor to the community. The citizens of Pima County addressed this issue, as well as safety, in 2004 by approving a \$10 million bond package to acquire land and other properties in the departure corridor. That \$10 million was spent on a total of 15 properties resulting in the removal of over 460 acres of land destined for high density development. In preparation for a Bond Election in 2014, Pima County proposed another \$10 million Noise Attenuation Bond Program for residences impacted by operational activities at the Base. Some objected to this proposal, and it was withdrawn. With community consensus, however, it could be added to a future bond program proposal.
2. Air Quality. The Pima County Department of Environmental Quality reviewed the data and concurred with the findings saying *"Since the projected air quality impacts are minimal, even a large margin of error in the modeling would still show insignificant levels of emissions increases from the project."*
3. Socioeconomics. Pima County information was listed as the source for some of the analysis in this section of the report. Our economist has reviewed the findings and found that the housing value trends presented in the report are consistent with the trends we have seen over the past few years. His comment was "Demographic and socioeconomic data and conclusions appear reasonable. I have not vetted each number appearing in the EA, but the numbers listed and conclusions reached from those numbers are consistent with my knowledge of the County and the impact areas." The County's values lag the EA values by a year, which can be explained by the difference in the Property Tax Valuation Year and the values as of a specific Calendar Year.

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The methodology of analysis can also influence the outcome using similar data. Recognizing that home values in this area are impacted by a number of factors, including age of the structure, construction and demographics, as well as their proximity to the flight path, our conclusion is that the trends presented in the EA are reasonable and consistent with general conditions in the years cited. This would still not modify the conclusion in the EA that there is no disproportional impact on minority of low-income populations compared to the No Action Alternative.

4. Cultural Resources. The County has long been a staunch advocate for and investor in the preservation of the many cultural resources in our region. We are pleased the Section 106 consultation was completed as a part of the EA. We work closely with the State Historic Preservation Office and have no opinions or concerns that would alter the conclusions reached in this section of the report.

Pima County has many roles in the community. The County has a responsibility to review the impact of projects like the Total Force Training Mission on our citizens, our environment, and our economic wellbeing and take a position where the impact is inappropriate.

We have completed our review, and we concur with the conclusions in the report. This version of the Environmental Assessment is much more thorough in its documentation of positive and negative impacts and provides a strong basis for the conclusions reached.

CHH/mjk

c: Dr. John Moffatt, Director, Office of Strategic Planning  
Patrick Cavanaugh, Business Services Coordinator, Economic Development and Tourism