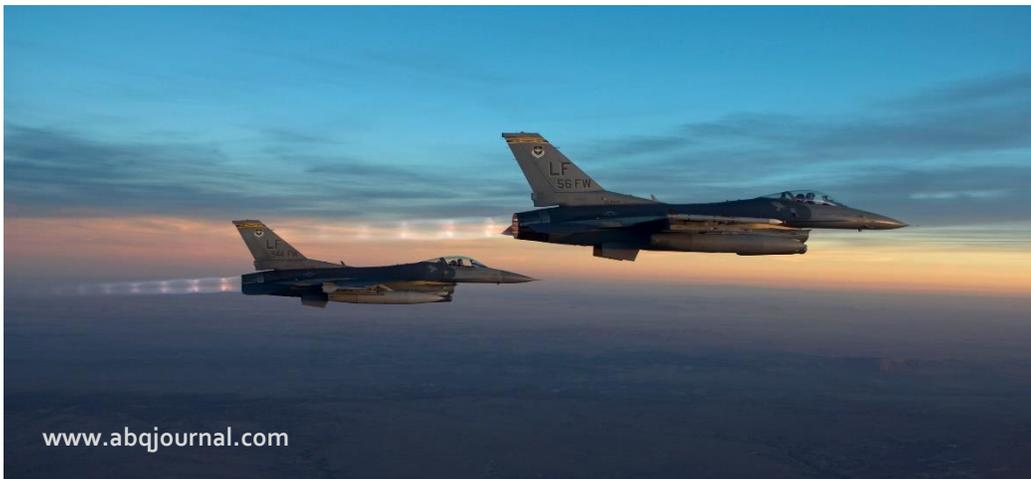


# F-16 Training over the Gila

Community Input to the Environmental Impact Statement

FEBRUARY 2019



## Cumulative Impacts of Alternative 2 Proposal for Holloman AFB

### Cumulative Impact of Alternative 2 on the Datil-Mogollon Section of New Mexico and the Mogollon Rim of Arizona

The Air Force has proposed a second alternative for F-16 fighter pilot training for Holloman Air Force Base over the Gila National Forest. Alternative 2, as it now stands, does not address the problem of cumulative impacts on an important geographic region in terms of scope. Alternative 2 also proposes an extraordinary intensity for a new military training use in what is widely considered the wildest area in New Mexico. The Air Force should address the wider impacts of its Alternative 2 before any decision is made.

Alternative 2 proposes the creation of a new Military Operations Area (MOA) named Lobos and the expansion of the Cato/Smitty MOAs for F-16 training by Holloman AFB. These MOAs were loosely denoted on **Map 1** (below) from the 2017 Air Force Notice of Intent to do an Environmental Impact Statement for airspace optimization for Holloman AFB.

## Peaceful Gila Skies

A coalition of business and community leaders, sportsmen and concerned citizens, united in our goal of protecting the Gila Region from military aircraft training.

[www.peacefulgilaskies.com](http://www.peacefulgilaskies.com) | 575.538.8078 | [peacefulgilaskies@gmail.com](mailto:peacefulgilaskies@gmail.com)

## Map 1

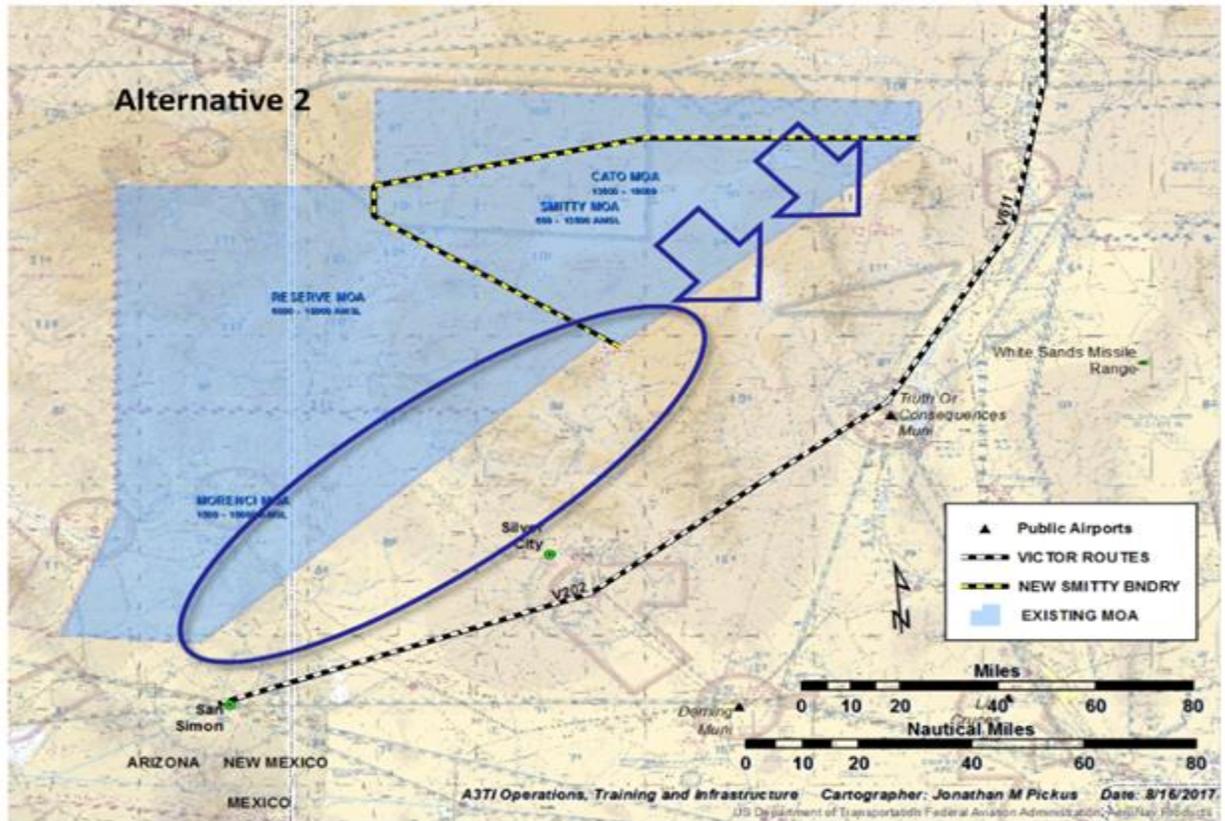


Image from website: *Environmental Impact Statement for Special Use Airspace Optimization for Holloman AFB, NM* [http://www.hollomanafbairspaceeis.com/Resources/Documents/Poster%203\\_Alternatives.pdf](http://www.hollomanafbairspaceeis.com/Resources/Documents/Poster%203_Alternatives.pdf)

The eastern and southern boundaries of these new areas for military training, denoted with just an ellipse and arrows, are obviously vague. Perhaps the Victor Route on **Map 1** (see map key) suggests a likely edge.

These new and expanded military training areas are adjacent to the Morenci, Reserve and Cato/Smitty MOAs, which are represented in silhouette. Omitted are the Jackal and Outlaw MOAs that are also contiguous and extend the existing military training areas from the edge of the Rio Grande Rift Valley in the east as far as Florence and the outskirts of Phoenix, AZ in the west. (See **Map 2** below) All of these areas are already used for F-16 training and other military training, but not by Holloman AFB.

## Map 2

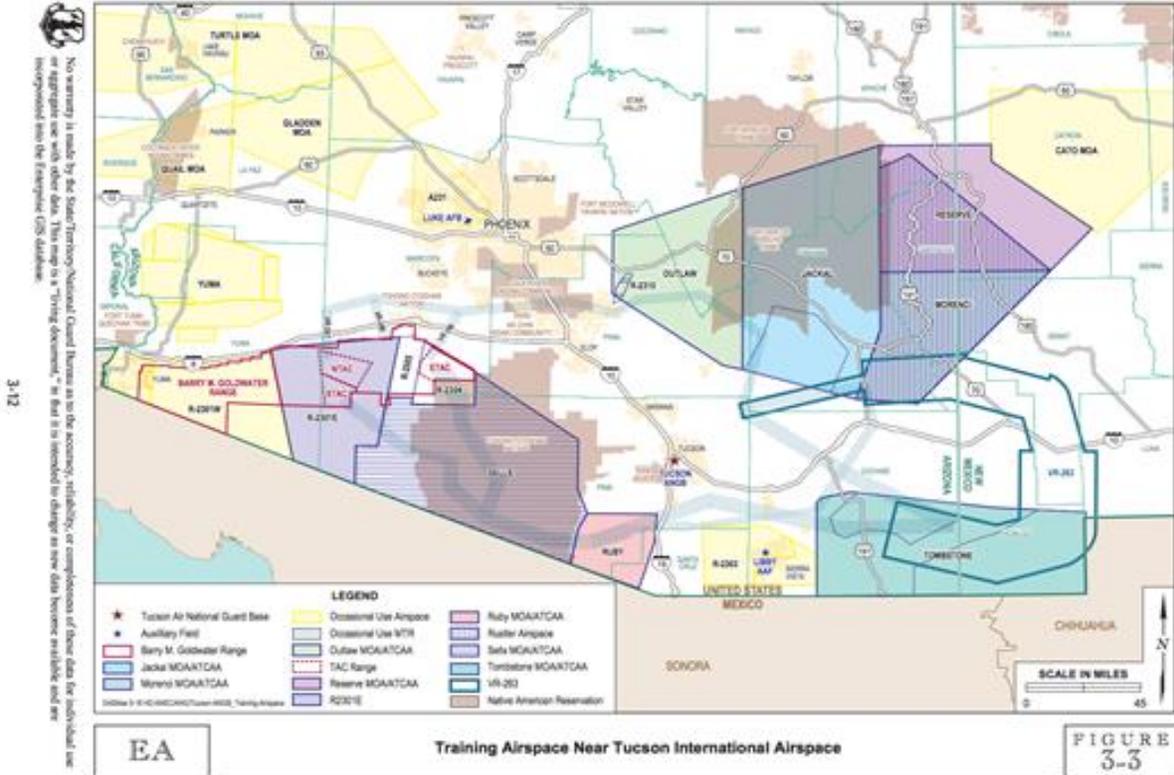


Image from: *Environmental Assessment for the Proposed Relocation of the Taiwan Air Force. June 2018.*  
[https://www.afcec.af.mil/Portals/17/documents/Environment/Taiwan%20AF%20to%20Tucson/EA\\_for\\_TAF\\_Relocati](https://www.afcec.af.mil/Portals/17/documents/Environment/Taiwan%20AF%20to%20Tucson/EA_for_TAF_Relocati)

Combined, these contiguous MOAs cover a large area: perhaps 250 miles from east to west and an average of 80 miles north to south for a total of approximately 20,000 square miles—twice the size of Massachusetts and Connecticut combined.

The addition of the Lobos MOA and the expansion of the Cato/Smitty MOAs into this contiguous block of military training area would add perhaps another 5,000 square miles -- another Connecticut.

This scale of impact on the landscape is important to keep in mind as the official analysis for Alternative 2 will likely focus only on the proposed 5,000 square mile component of the contiguous block of MOAs, i.e., the expansion of Cato/Smitty MOAs and the addition of Lobos MOA.

It is also important to observe the lack of terrain detail on the above maps. On **Map 1**, the tan out-of-focus background of the proposed Lobos MOA and the Cato/Smitty expansion suggests a barren surface. The Morenci, Reserve, and Cato/Smitty are silhouetted, but the terrain beneath is also featureless. On **Map 2**, the surface representation beneath Jackal and Outlaw MOAs only denotes county boundaries.

In fact, much of the land surface beneath these MOAs is mountainous with significant forests—and rivers. (See **Map 3** below)

### Map 3



Image from Google Earth November 19, 2018. Green icon on right: San Mateo Range. Green icon center right: Mogollon Mountains. Green Icon upper left: White Mountains. Green icon lower left Pinaleno Mountains.

The White Mountains, fully encompassed in the MOAs, are the source for the largest headwaters area in Arizona, including nearly the entire watersheds of the Black River, White River, and Salt River to Roosevelt Lake, as well as the Blue and the San Francisco Rivers. With the addition of the Lobos MOA and the expansion of the Cato/Smitty MOA, all of the Mogollon Mountains and most of the Black Range, both largely forested, will also lie beneath MOAs. This area includes the entire headwaters of the Gila and Mimbres rivers, the largest sources of freshwater in southern New Mexico. The contiguous MOAs will include nearly all of the Gila River watershed as far as the San Carlos Reservoir.

These mountains and rivers are where the Rocky Mountain, Great Basin floral and faunal provinces from the north overlap with Madrean provinces from the south. They harbor a rich biological resource that is largely intact, extremely diverse, and quite vulnerable. (See **Map 4**).

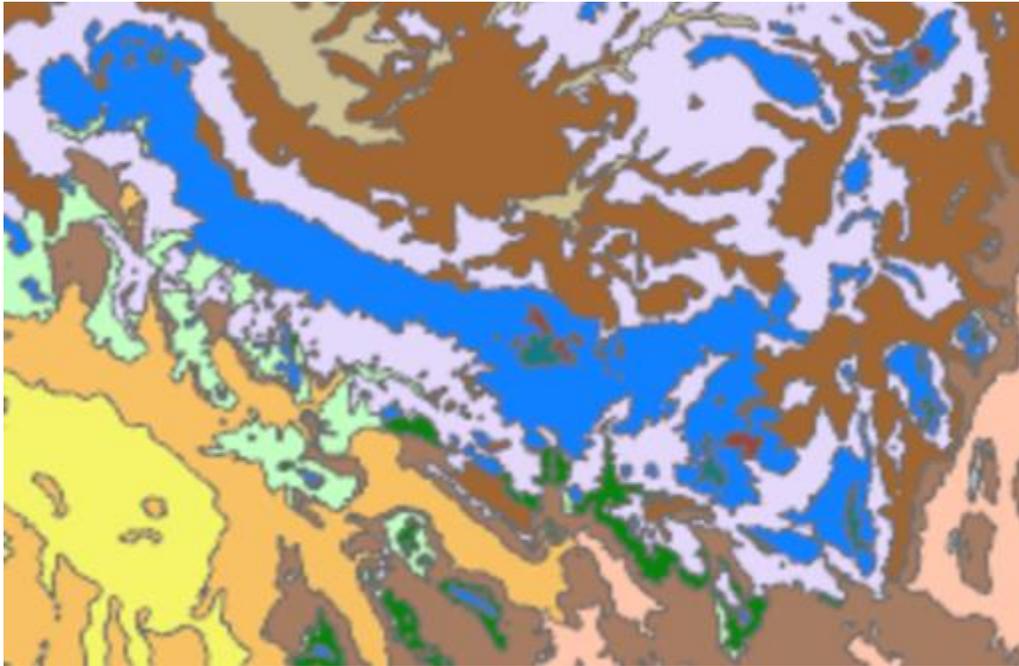
### ▼ Brown and Lowe's Biotic Communities of the Southwest

Displaying: BLP\_CODE

	111.5 Alpine Tundras
	121.3 Petran Subalpine Conifer Forest
	121.4 Sierran Subalpine Conifer Forest
	122.3 Petran Montane Conifer Forest
	122.4 Great Basin Conifer Woodland
	122.5 Sierran Montane Conifer Forest
	123.3 Madrean Evergreen Woodland
	123.4 Californian Evergreen Woodland
	124.6 Sinaloan Conifer Forest
	132.1 Great Basin Montane Scrub
	133.1 Californian Chaparral
	133.2 Californian Coastal Scrub
	133.3 Interior Chaparral
	134.3 Sinaloan Thornscrub
	141.4 Subalpine Grassland
	142.1 Plains and Great Basin Grassland
	143.1 Semidesert Grassland
	143.2 Californian Valley Grassland



## Map 4



Detail from: *Brown and Lowe's Biotic Communities of the Southwest*. 2012.  
<https://databasin.org/datasets/e8e241e869054d7e810894e5e993625e>

For comparison with **Map 3**, note that the Petran Subalpine Conifer Forest color field in the approximate center of this map represents the White Mountains.

Nearly all of the Apache National Forest is currently used as a training area for military pilots, and so are large portions of the Tonto National Forest and the Gila National Forest. With the addition of the Lobos MOA and the expansion of the Cato/Smitty MOAs, nearly all of the Gila National Forest would fall under new military training use, including all of the Gila Wilderness and most of the Aldo Leopold Wilderness and large parts of the Cibola National Forest. (See **Map 5**)

## Map 5



Significantly, in southwest New Mexico, where the first wilderness area was conceived and created, nothing is set aside for the original purpose of Aldo Leopold's vision of an undisturbed wild reserve.

**Scale of Use Intensity:** The Air Force proposal for Holloman F-16 training states the required intensity of use:

- 10,000 sorties annually
- flight floors of 500 above ground level (AGL)
- 10% of sorties supersonic
- 10% of sorties at night
- 15,000 bundles of chaff dropped
- 15,000 flares ignited and dropped

Table 3-1 below, drawn from the current Environmental Assessment for the Taiwan Air Force relocation from Luke AFB to Tucson Air National Guard Base (Tucson International Airport), provides a glimpse into current levels of use in the Outlaw-Jackal-Morenci-Reserve sections of the contiguous block discussed above.

(Note: for reasons that are not entirely clear, the Morenci MOA and most of the Reserve MOA are collectively referred to as the Rustler Airspace. See note 4 in the table below.)

*EA for TAF Relocation  
Draft - June 2018*

1 **Table 3-1. Existing Military Training Airspace and 162 WG F-16 Operations**

Airspace	Airspace Type	162 WG F-16 Operations	Total Operations
Jackal	MOA/ATCAA	1,675	2,125
Outlaw	MOA/ATCAA	1,283	1,627
Ruby <sup>1</sup>	MOA/ATCAA	1,668	2,115
Rustler <sup>2</sup>	MOA/ATCAA	1,939	2,460
Sells	MOA/ATCAA	8,321*	11,368*
Tombstone	MOA/ATCAA	2,685	3,406
R-2301E	Restricted Area	16,342*	21,230*
VR-263	MTR	246	299

2 Notes:

3 <sup>1</sup> Includes Fuzzy MOA

4 <sup>2</sup> Includes Morenci and the southwest section of Reserve MOAs/ATCAAs named so for scheduling with Albuquerque ARTCC

6 \* Includes F-16 operations from the 56th Fighter Wing (56 FW) at Luke AFB

7 Jackal, Outlaw, Ruby, Rustler, and Tombstone MOAs/ATCAAs operations taken from 2012 F-35 Basing Environmental Impact Statement (EIS) Baseline Scenario for TUS while Sells MOA/ATCAA and R-2301E operations taken from Proposed Luke AFB Scenario 6.

10 Source: USAF 2012.

While the table is silent on topics other than the level of F-16 sorties, it is fair to surmise that the other elements of use are proportional to what Holloman AFB proposes.

The new and expanded training areas proposed, which together are only about 25% of the larger contiguous block of MOAs, could experience twice the number of sorties that currently occur in the larger area. Proportionately, the intensity per square mile would be 8 times higher. (20,000 sq. mi.: 5,000 sorties: 5,000 sq. mi.: 10,000 sorties).

**Alternative 2 proposes an extraordinary intensity for a new use in what is widely considered the wildest area in New Mexico. Alternative 2 does not address the problem of cumulative impacts on an important geographic region in terms of scope. The Air Force should address the wider impacts of its Alternative 2 before any decision is made.**