



Final

Environmental Assessment

Volume II

Addressing the Establishment of Urban
Close Air Support (CAS) Air and Ground
Training Spaces near Mountain Home Air
Force Base, Idaho



November
2018



ABBREVIATIONS AND ACRONYMS

°F	degrees Fahrenheit	MHRC	Mountain Home Range Complex
µg/m ³	micrograms per cubic meter	MOA	military operations area
366 FW	366th Fighter Wing	MSL	mean sea level
AFB	Air Force Base	MTR	military training route
AFI	Air Force Instruction	NAAQS	National Ambient Air Quality Standards
AGL	above ground level	NEPA	National Environmental Policy Act
ALTRV	Altitude Reservation	NHPA	National Historic Preservation Act
ANSI	American National Standard Institute	NM	nautical mile(s)
AOCI	Area of City Impact	NO ₂	nitrogen dioxide
ARFF	Aircraft Rescue Fire Fighting	NOTAM	Notice to Airmen
ASN	Aircraft Safety Network	NO _x	oxides of nitrogen
ATC	Air Traffic Control	NRHP	National Register of Historic Places
ATCAA	Air Traffic Control Assigned Airspace	O ₃	ozone
ATCT	Air Traffic Control Tower	OPFOR	Opposing Forces
BASH	Bird/Wildlife Aircraft Strike Hazard	PM _{2.5}	particulate matter less than 2.5 microns in diameter
BLM	Bureau of Land Management	PM ₁₀	particulate matter less than 10 microns in diameter
CAA	Clean Air Act	POE	port of entry
CAS	Close Air Support	ppb	parts per billion
CEQ	Council on Environmental Quality	ppm	parts per million
CFR	Code of Federal Regulations	RA	restricted area
CO	carbon monoxide	RAPCON	Radar Approach Control
dB	decibels	RNAV	Area Navigation
dba	A-weighted decibels	ROEs	Rules of Engagement
DNL	day-night sound level	ROI	region of influence
DOD	Department of Defense	SEL	sound exposure level
DODD	Department of Defense Directive	SHPO	State Historic Preservation Officer
DODI	Department of Defense Instruction	SIP	State Implementation Plan
DVIR	Duck Valley Indian Reservation	SO ₂	sulfur dioxide
EA	Environmental Assessment	SO _x	oxides of sulfur
EIS	Environmental Impact Statement	SUA	Special Use Airspace
EO	Executive Order	tpy	tons per year
FAA	Federal Aviation Administration	USAF	U.S. Air Force
FAR	Federal Aviation Regulation	USC	United States Code
FFOR	Friendly Forces	USEPA	U.S. Environmental Protection Agency
ft	foot (feet)	VOC	Volatile organic compounds
GHG	greenhouse gas	ZLC	Salt Lake City Air Traffic Control Center
GPS	Global Positioning System	ATCC	
ID DOT	Idaho Department of Transportation		
IR	infrared		
JO	Joint Order		
JTAC	Joint Terminal Attack Controller		
L _{eq}	equivalent sound level		
L _{max}	maximum sound level		
LOA	Letter of Agreement		

FINAL

ENVIRONMENTAL ASSESSMENT

ADDRESSING

ESTABLISHMENT OF URBAN CLOSE AIR SUPPORT
(CAS) AIR AND GROUND TRAINING SPACES NEAR
MOUNTAIN HOME AIR FORCE BASE, IDAHO

VOLUME II



AIR COMBAT COMMAND

NOVEMBER 2018

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- D: NHPA Section 106 Documentation
- E: NOHDs for Laser Designating Technologies

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A

Interagency, Stakeholder,
and Public Coordination



Appendix A: Public and Stakeholder Coordination List

Federal Agencies

Bureau of Land Management
United States Fish and Wildlife Service
United States Department of Agriculture-
United States Forest Service
United States Environmental Protection
Agency, Region 10
Federal Aviation Administration

Federal Political Representatives

Idaho Senators
Idaho Congressional Representatives,
Districts 1 and 2

State Agency Contacts

Idaho Army National Guard
Idaho Department of Lands
Idaho State Historic Preservation Officer
Special Assistant for Military Affairs
Idaho Department of Agriculture
Idaho Fish and Game
Idaho Department of Parks and Recreation
Idaho Transportation Department

State Political Representatives

Governor of Idaho
Idaho House of Representatives, Districts
22 and 23
Idaho Senate, District 23
Oregon Senate, District 47

Local Agencies and Officials

Ada County Commission, District 1
Mayor of Boise
Boise Metro Chamber of Commerce

Mayor of Burley

Owyhee Board of Commission, Districts 1
and 2

Mayor of Grand View

Mayor of Marsing

Elmore County Commission, Districts 1, 2,
and 3

Mayor of Mountain Home

Mountain Home Chamber of Commerce

Mountain Home City Council

Mayor of Glenns Ferry

Glenns Ferry Chamber of Commerce

Mayor of Twin Falls

Twin Falls County Board of Commission,
Districts 1, 2, and 3

Twin Falls Chamber of Commerce

Tribal Contacts

Burns Paiute Tribe

Northwestern Band of the Shoshone Nation

Paiute-Shoshone Tribes of Fort McDermitt

Shoshone-Bannock Tribes

Shoshone-Paiute Tribes of Duck Valley

Non-Governmental Organizations

Idaho Conservation League

Idaho Rivers United

Idaho Wildlife Federation

Sierra Club

Western Watersheds Project

Sierra Club Middle Snake Group

The Nature Conservancy

The Wilderness Society

Wildlands Defense

Libraries

Boise Public Library

Bruneau District Library

Glenns Ferry Public Library

Eastern Owyhee County Public Library

Mountain Home AFB Library

Mountain Home Public Library

Twin Falls Public Library

Appendix A: Public Scoping Period

Example General Scoping Letter



**DEPARTMENT OF THE AIR FORCE
366 CIVIL ENGINEER SQUADRON (ACC)
MOUNTAIN HOME AIR FORCE BASE IDAHO**

February 6, 2018

MEMORANDUM FOR: MR. MICHAEL COURTNEY, TWIN FALLS DISTRICT MANAGER,
BUREAU OF LAND MANAGEMENT

FROM: 366 CES/CEIE
1030 Liberator Street
Mountain Home AFB ID 83648

SUBJECT: Description of the Proposed Action and Alternatives for an Environmental Assessment
Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training
Spaces near Mountain Home Air Force Base, Idaho

In accordance with the National Environmental Policy Act and its implementing regulations, the United States Air Force (USAF) and the 366th Fighter Wing have initiated development of an Environmental Assessment (EA) to evaluate proposed establishment of air and ground training spaces in urban centers located near Mountain Home Air Force Base (AFB) to support Urban Close Air Support (CAS) proficiency training for F-15E aircrews. Training in urban centers is needed because these areas provide an environment with the same tactical challenges encountered during deployment. Nine urban centers have been identified for this training: Boise, Mountain Home, Burley, Twin Falls, Grandview, Glenns Ferry, Bruneau, Hammett, and Mountain Home AFB. The purpose of this letter is to respectfully invite your participation in the evaluation and preparation of the EA.

The proposed training would be limited to coordinated flight and ground tracking of simulated targets in the urban centers. Analysis in the EA will address Urban CAS training scenarios wherein aircrews would fly over urban centers and, with the support of ground teams including Joint Terminal Attack Controllers simulating "friendly forces," would use electronic communications equipment and global positioning systems (GPS) to identify, track, target, and complete a mock-neutralization (i.e., electronically simulated engagement) of "opposing forces" teams. Ground teams would use electronic communication devices, GPS, and low-power, eye-safe lasers that would be visible to the aircraft to mark targets. Realistic preparation for Urban CAS ground activities during deployments would require that all members of each ground support team behave in a manner typical of any community member to avoid drawing attention to themselves or the operations. Thus, ground support personnel would be unarmed and dressed in plain clothes. Members of each ground support team would be inside civilian vehicles driving along city paved streets and paved roadways during training operations. Ground support personnel may be positioned on paved roads located anywhere within the ground operating area, such as in vehicles driving along streets or parked along the side of a road. Individuals among the ground teams may momentarily exit the vehicle onto sidewalks or in parking lots to establish or re-establish communications with aircrews. Ground support would not interfere with civilian traffic or pedestrians. All activities would be conducted IAW local laws and ordinances and with the goal of leaving no trace of their activities.

Mountain Home AFB is providing this Description of the Proposed Action and Alternatives (DOPPA) in accordance with Executive Order (EO) 12372, as amended to EO 12416, *Intergovernmental Review of Federal Programs*, and EO 13175, *Consultation and Coordination with Indian Tribal Governments*, and encourages your review and participation. The attached DOPAA will become Sections 1 and 2 of the EA. USAF anticipates publishing the Draft EA in spring and the Final EA in summer 2018.

We respectfully request receipt of any comments or concerns within 30 days of receipt of this correspondence. If you have any questions, or require additional information, please contact Ms. Noelle Shaver at noelle.shaver@us.af.mil or 366 CES/CEIE, 1030 Liberator Street, Mountain Home AFB 83648.

Respectfully



SHERI L. ROBERTSON
Chief, Environmental Management

Attachment:

Description of the Proposed Action and Alternatives for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, January 2018.

Public Scoping Comment Resolution Matrix

#	Commenter	Type of Content	Date Received	Comment	Government Response
1	Katie Fite WildLands Defense		15-Mar-18	Can you please provide a copy of, or point me to a link on, the Final EA and the Record of Decision? (MHRC Operational EA_2017)	Thank you for your comment. Please refer to the Mountain Home AFB Environmental Page.
2	Katie Fite WildLands Defense		19-Mar-18	Does CAS Urban War Range Public Meeting Suspension Mean Comment Period Deadline is Indefinitely Delayed?	No. Deadline is 17 APR.
3	Lynne Ann Hood - EPA R10- Idaho Operations Office		7-Mar-18	* Noise Pollution* While noise induced hearing loss is the most common health effect associated with noise pollution, we note that exposure to constant or high levels of noise can cause other adverse health effects, including stress related illnesses, high blood pressure, speech interference, sleep disruption, and lost productivity. Therefore, due to the noise levels generated by F-35 aircraft, we recommend a comprehensive analysis of potential impacts associated with the proposed activities in each location	The Urban CAS proposal is for the F-15E's and not the F-35's. Noise analysis will be conducted in the Environmental Assessment (EA).
4	Lynne Ann Hood - EPA R10- Idaho Operations Office		7-Mar-18	We further recommend that special consideration be given to sensitive receptors as well as environmental justice communities in each location.	Noise analysis will be conducted in the EA.
5	Lynne Ann Hood - EPA R10- Idaho Operations Office		7-Mar-18	Additionally, we recommend that the potential impacts from high levels of noise and appropriate mitigation to offset those impacts, in consultation with potentially affected stakeholders, be evaluated in the EIS. We also recommend discussion and analysis of compliance with any local or regional noise ordinances in the EIS.	Noise analysis will be conducted in the EA to determine if a FONSI can be reached or an EIS is required.
6	Lynne Ann Hood - EPA R10- Idaho Operations Office		7-Mar-18	* Environmental Justice and Public Participation* We recommend that the EA should include an evaluation of environmental justice populations within the geographic scope of the project. If such populations exist, the EA will need to address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations. We recommend that the assessment of the project's impact on minority and low-income populations should reflect coordination with those affected populations. One tool available to locate Environmental Justice populations is the Environmental Justice Geographic Assessment tool.	Thank you for your comment. Analysis of impacts on resources will be F64conducted for resources where there is potential for greater than negligible impacts to occur.
7	Lynne Ann Hood - EPA R10- Idaho Operations Office		7-Mar-18	* Cumulative Impacts* We recommend that the EA consider the cumulative effects of this and other actions' impacts on human health and the environment. We acknowledge that concurrent to this analysis, the Department of Defense, Air National Guard released a Notice of Intent to prepare an Environmental Impact Statement to analyze the effects of F-35 Operational Beddown at airfields including Gowen Field in Boise, ID. The proposed Mountain Home CAS would also occur in Boise, Idaho – and we note that it could potentially create cumulative project impacts and pressure on local communities and wildlife. We recommend that this action, as well as any other upcoming actions, be	Cumulative impacts will be analyzed in the EA.

#	Commenter	Type of Content	Date Received	Comment	Government Response
				evaluated in an EA cumulative effects analysis.	
8	Barbara Priest		Thursday, March 22, 2018 11:38 AM	Are you stupid or crazy? The chance of disaster is too great. The noise and air pollution that it will add to our lives is huge. Have the air force build you a town out in the desert.	Noise and air quality impacts be analyzed in the EA.
9	Katie Fite Wildlands Defense		23-Mar-18	I have repeatedly requested an answer to my inquiry about whether the cancellation of Boise, Eagle, Meridian, Mtn Home Scoping meetings for the Urbacn CAS proposal means the comment period on the DOPAA is extended, or on hold, or if the project will be re-scooped.	Thank you for your comment. The comment period was extended from 8 MAR to 17 APR.
10	Phillip Roemer		26-Mar-18	I would like to express my opposition to the Urban CAS WAR Range proposal that is being considered. If you intend to move forward with this proposal I do have some request for information. I would like to see the results of an Environmental Impact Statement.	The draft environmental assessment will be available for public comment once developed.
11	Phillip Roemer		26-Mar-18	I would like to know what kind of budget you have allocated to reimburse damages from negative externalities such as: impacts on the air quality due to the increased pollution, repaing walls that may be broken by the vibrations the aircraft cause, and costs stemming from economic disruptions due to events such as closed highways or causing people who are employed during night hours to miss work due to safety concerns from being fatigued from the disturbance caused by the aircraft.	Budgeting is not a NEPA category of analysis. A noise analysis will be included in the EA.
12	Phillip Roemer		26-Mar-18	Furthermore, the Department of Defense Instruction 3025.21, along with a myriad of other laws and field manuals, gives the military the power to use force - including lethal force - against US citizens on US soil. While legal, this has been historically viewed as an inappropriate use for the military when it has happened in the past. Given that this activity is not supported by the general public, I would like to know what assurances you are offereing that this urban training taking place in our cities will not be converted into training for the military to kill US citizens in the future.	Thank you for your comment. The proposed training is required to ensure aircrews are proficient in flying Urban CAS missions to ensure readiness when deployed.
13	Katie Fite Wildlands Defense		26-Mar-18	Isn't the comment period supposed to extend 15 days after the last public meeting? Having the comment period close right after the last public meeting does not provide the public an opportunity to adequately compose comments of concern.	The comment period extended from 8 MAR to 17 APR.
14	Katie Fite Wildlands Defense		26-Mar-18	Why is this being rushed?	MHAFB is going above and beyond legal requirements which is extending the NEPA process.
15	Barbara Schmidt, USFWS		26-Mar-18	The FWS currently has no comments regarding the proposed action	Thank you for the notification.
16	Gene McGill		20-Mar-18	I am a registered Republican (the party of my father, an IL farmer and WWII veteran). I live less than 1.5 miles north of the Gowen Field runway near the intersection of Vista and Cherry. I was in Boise when the F-15 Eagle jets from the Mountain Home Air Force Base were temporarily training from Gowen Field. The noise from the F-15 was significantly louder than the A-10 Thunderbolt jets stationed at Gowen	The Urban CAS proposal is for the F-15E's and not the F-35's. The proposal does not include landing or taking off from Gowen Field.

#	Commenter	Type of Content	Date Received	Comment	Government Response
				Field. I am concerned about elevated noise and air pollution of the F-35 jets compared to the current A-10 jets.	
17	Gene McGill		Tuesday, March 20, 2018 11:24:11 AM	There is a proposal to establish several Urban Close Air Support training spaces over urban areas between Mountain Home and Boise as well as between Mountain Home and Burley. The noise and air pollution from the proposed Urban Close Air Support training spaces will have a serious negative impact to the Vista Neighborhood adult residents and school children. The noise and air pollution from the proposed Urban Close Air Support training spaces will have a negative impact to the whole Treasure Valley metropolitan area. I oppose the proposed Urban Close Air Support training spaces over urban areas in south west Idaho.	Thank you for your comment. Both noise and air will be analyzed in the EA
18	Chad Thompson		Tuesday, March 6, 2018 9:14:30 AM	The higher the density a population becomes, the more restrictions there are on pollution because of the higher impact. One of the worst today is noise pollution. There are a myriad of laws published to address that, from "loud mufflers" citations to arrests for assault. When F15s/F16s were flying low over Boise this summer prepping for the air show, one went low overhead my house when I was outside. I suffered a headache and ringing ears the rest of the day. If a person had done that they would have been arrested and jailed. The military gets a lot of leeway from me, but not when what they are doing is equivalent to assaulting hundreds of thousands of Americans in the Boise valley. Furthermore, its a very bad move long term for the military because its going to build up ongoing resentment and anti-military voting.	Noise will be analyzed in the EA. The proposed Urban CAS flight profiles differ from air shows. Lowest proposed flight altitude is 1.89 miles AGL.
19	Chad Thompson		Tuesday, March 6, 2018 9:14:30 AM	There are half a million acres south of this area and far more south and east of that. Flying over cities creates far more harm than benefit. Furthermore, as a family of Army veterans, we've seen F## dropping bombs on our own troops and friendlies far too often. F## work for quick response when everything goes perfectly - which rarely happens. Even the Russian's latest engagement policies are to first scramble C&C capability and coordination - which F## are completely reliant on. The AF either needs to be efficient and effective at "slow and quiet" CAS or get out entirely. A10, the 3 possible replacements/assistants for A10s, drones, etc. F## planes aren't it.	Refer to Section 1.5, Purpose of and Need for the Proposed Action, in the DOPPA.
20	Katie Fite WildLands Defense		Thursday, March 1, 2018 9:30:19 AM	The dates of the meetings (starting March 5) are too close to when the Air Force decided to try to notify the public. Many folks have PO Boxes, and don't check them every few days. Or have to make plans in advance to be able to attend meetings during the week. And who is the Air Force notifying? The Air Force should notify all residents under the Nine Cities War Game proposal - as this will impact the quality of life, potentially health, home values, and potentially safety of ALL of this population.	USAF is adhering to all legal notification requirements under NEPA and notifying public via multiple media outlets.
21	Katie Fite WildLands Defense		Thursday, March 1, 2018 9:30:19 AM	It is also our belief that an EIS is required for this new Urban Warfare Range - as the scale over a civilian population is unprecedented, and uses are very likely to change - including impost of the noxiously loud	The action does not include development of a new range. The EA will determine whether

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				F-35 or other planes. This would require publication of a Notice in the Federal Register.	can reach a FONSI or an EIS is required.
22	Katie Fite WildLands Defense		Thursday, March 1, 2018 9:30:19 AM	It seems this project is being fast-tracked through. I am very concerned the AF is seeking to finalize it prior to the completion of the F-35 EIS. This monstrous Urban Range could then be used as an "asset" in the F-35 EIS process to weigh the outcome in favor of basing F-35s in Boise. As you are aware, various bases are "competing" with one another. Getting a massive Range expansion would aid in that competition. I would also like to make sure that the Air Force makes clear to the public (including in Scoping meetings) that the F-15s are planned to be replaced, and according to information displayed at the Boise F-35 Scoping meeting, the F-35 is very likely to be the replacement plane.	The action does not include development of a new range. The proposed training is for F-15Es. Per USAF HQ, F-15s are currently not slated to be replaced by F-35s.
23	Katie Fite WildLands Defense		Wednesday, March 14, 2018 6:48:59 PM	I am very concerned that the new Singapore beddown is connected to the unprecedented SHIFT of military war games onto a new Urban War Range that the Nine Cities CAS DOPAA proposal would carve out. The War Range proposal would take place on top of this major civilian population. Is the shift to a civilian population making room for increased Singapore training? WHO was mailed a copy of this Singapore beddown proposal? Please provide the mailing list. This Air Force appears to be illegally segmenting NEPA processes.	The proposed training would involve flight of F-15E and F-15 SG aircraft. Urban CAS aircrew proficiency training involving use of both of these aircrafts already occurs in Mountain Home AFB airspace. The proposed training is to ensure aircrews are proficient in flying Urban CAS missions prior to deployment.
24	Katie Fite WildLands Defense		Wednesday, March 14, 2018 6:48:59 PM	Please consider this email to be a comment on the Singapore Draft EA. Who is the contact person and project lead in charge of it? There is no info on public comment in the Singapore DEA that I could find. Are there OTHER Air Force (or potentially Guard) EAs or CXs currently open for public comment? If so, what are they? What else has been released to a tiny hand full of people over the years?	Comment will be included with the RSAF Beddown EA.
25	Jean Jeffries		Monday, March 19, 2018 8:15:34 AM	This email is to request that the Boise/Mountain Home area NOT be used for Air Force training and work. This is an urban area and the noise alone will affect too many people.	Noise analysis will be conducted in the EA.
26	Tim Pauls		Thursday, February 22, 2018 5:00 PM	My neighborhood email group and other various folks have identified you as the contact for any reactions to proposed close air support drill over Boise, Idaho. (Lucky you!) I was particularly amused by the reader who expressed concern that radar jammers might activate our garage door openers. Here's my reaction: I'm all for it. Thumbs up. Bring 'em on. It's the least we can do. If the worst case doomsday scenario does take place and my garage door goes up on its own, well ... I can always put it back down again. My thanks to all in the Air Force for their service.	Thank you for your comment.
27	Katie Fite WildLands Defense		Wednesday, February 21, 2018 8:05 PM	I request that the Air Force notify ALL households in the nine affected Idaho cities. Will you do this? The Comment Period must be extended so once citizens are informed, they can respond. This is a matter of significant concern - and endangers the health and lives of the public living in these Urban areas in many ways. It subjects people to military	USAF is adhering to all legal notification requirements under NEPA and notifying public via multiple media outlets and conducting public scoping

#	Commenter	Type of Content	Date Received	Comment	Government Response
				plane overflights, and the adverse effects of such noise are harmful to human health, harmful to childhood cognitive development, and impacts on human health are cumulative.	meetings.
28	Katie Fite WildLands Defense		Wednesday, February 21, 2018 8:05 PM	"Training" over urban areas can result in disastrous lethal crashes over Urban Areas. These War Planes also contain hazardous substances that further endanger civilian populations in the event of crashes. During overflights, there are many harmful technological devices that planes may use - or accidentally use, and endanger human and animal health.	Historical aircraft mishap data will be analyzed in the EA.
29	Katie Fite WildLands Defense		Wednesday, February 21, 2018 8:05 PM	This will increase air and noise pollution over Boise and other urban areas. The USAF has fake buildings to train over on its remote ranges in Owyhee County. Why isn't this training taking place there?	See purpose and need for training in the DOPPA.
30	Katie Fite WildLands Defense		Wednesday, February 21, 2018 8:05 PM	Why will Boise citizens be subject to War Game activities and overflights from the Singapore Air Force? What other bases or foreign entity planes will use the "Range"?	The proposal does not include establishing a new range. Proposal only includes F-15E training.
31	Katie Fite WildLands Defense		Wednesday, February 21, 2018 8:05 PM	How loud are planes at the elevations listed? Will they drop lower? What are the infrasound levels of these planes? A full environmental baseline must be provided.	Noise analysis will be conducted in the EA. Aircraft would not fly lower than 10,000 ft. AGL (1.89 miles above ground).
32	Katie Fite WildLands Defense		Wednesday, February 21, 2018 8:05 PM	Is your address the official e-mail address for comments? If not, what is?	Yes
33	Katie Fite WildLands Defense		Wednesday, February 21, 2018 8:05 PM	How is this related to potential F-35 use of the MHAFFB Range, or potential siting of F-35s at Gowen Field?	These are not related actions.
34	Inna Patrick		Wednesday, February 21, 2018 10:54 PM	I thank MHAFFB for explaining the military's need for using my city in Urban CAS Training using 2 to 4 F-15's at a time. I wish to explain why I do not need two to four F-15E over my head. From the elevation of 10,000 ft, max loudness of F-15 is 75 dBA. The equivalent of a functioning vacuum cleaner. 2 - 4 F-15's will therefore produce 2 - 4 times the noise, i.e. the equivalent of 85 to 95 dBA. The equivalent of a power mower. OSHA requires wearing hearing protection for people routinely exposed to this level of noise. Therefore, your proposal endangers public health. I object to your Urban CAS war games over Boise, as I am sure a lot of other people will do.	Noise analysis will be conducted in the EA.
35	Katie Fite WildLands Defense		2/22/2018 8:46	I recently received notification of a shocking proposal from the USAF to train/conduct War Game exercises of nine Idaho Urban areas. This proposal is being scoped under a mere EA. It is critical that an EIS be prepared to analyze all direct, indirect, and cumulative effects. I request that the AF notify ALL households in the nine affected Idaho cities. Will you do this? The comment period must be extended so once citizens are informed, they can respond.	Noise analysis will be conducted in the EA.

#	Commenter	Type of Content	Date Received	Comment	Government Response
36	Katie Fite WildLands Defense		2/22/2018 8:46	This is a matter of significant concern - and endangers the health and lives of the public living in these Urban areas in many ways. It subjects people to military plane overflights, and the adverse effects of such noise are harmful to human health, harmful to childhood cognitive development, and impacts on human health are cumulative.	Noise analysis will be conducted in the EA.
37	Katie Fite WildLands Defense		2/22/2018 8:46	"Training" over urban areas can result in disastrous lethal crashes over urban areas. These War Planes also contain hazardous substances that further endanger civilian populations in the event of crashes.	Please see response to Comment 28
38	Katie Fite WildLands Defense		2/22/2018 8:46	During overflights, there are many harmful technological devices that planes may use - or accidentally use, and endanger human and animal health.	Please see response to Comment 28
39	Katie Fite WildLands Defense		2/22/2018 8:46	This will increase air and noise pollution over Boise and other urban areas. The USAF has fake buildings to train over on its remote ranges in Owyhee County. Why isn't this training taking place there?	Please see response to Comment 29
40	Katie Fite WildLands Defense		2/22/2018 8:46	Why will Boise citizens be subject to War Game activities and overflights from the Singapore Air Force?	Please see response to Comment 30
41	Katie Fite WildLands Defense		2/22/2018 8:46	What other types of planes will be using the "Range"?	Please see response to Comment 19.
42	Katie Fite WildLands Defense		2/22/2018 8:46	What other bases or foreign entity planes will use the "Range"?	Please see response to Comment 30.
43	Katie Fite WildLands Defense		2/22/2018 8:46	What are the levels harmful infrasound produced by these planes?	Please see response to Comment 31.
44	Katie Fite WildLands Defense		2/22/2018 8:46	Will these planes increasingly land in Boise - adding to the noise and air pollution concerns?	Please see response to Comment 16.
45	Katie Fite WildLands Defense		2/22/2018 8:46	How loud are planes at the elevations listed? Will they drop lower?	Please see response to Comment 31.
46	Katie Fite WildLands Defense		2/22/2018 8:46	What are the infrasound levels of these planes?	Please see response to Comment 31.
47	Katie Fite WildLands Defense		2/22/2018 8:46	A full environmental baseline must be provided.	Please see response to Comment 6.
48	Katie Fite WildLands Defense		2/22/2018 8:46	Is your address the official email address for comments? If not, what is?	Please see response to Comment 32.
49	Katie Fite WildLands Defense		2/22/2018 8:46	How is this related to potential F-35 use of the MHAFB Range, or potential siting of F-35s at Gowen Field?	Please see response to Comment 33.
50	Katie Fite WildLands Defense		2/22/2018 8:46	Please note the USAF letter was sent to a colleague's PO Box, and not my address.	Noted.
51	Justin Nyquist		Monday, February 26, 2018 10:00 AM	There is a very small, very vocal group of naysayers in Boise who have nothing better to do than solicit others to oppose anything having to do with Fighter Jets, Gowen Field or military ops in general. They rely on misinformation, outright lies and propaganda/hyperbole to spread their venom. The vast majority of Boise and the Treasure Valley	Thank you for your comment.

#	Commenter	Type of Content	Date Received	Comment	Government Response
				supports this training op. On a sidenote, if there's anything you'd need as far as civilian actors, I would offer my time. I'm a 5-yr. USMC vet, and was an Iraqi and Arabic cryptologic linguist. I am willing to donate my time if there is any role you might have.	
52	Inna Patrick		Sunday, February 25, 2018 2:55 PM	I have read the public notice and the document describing USAF Urban CAS proposal, that includes troops and F- 15E's training in and over my city of Boise and 8 other Idaho cities. What a concept! I would like to find out from you for sure, who authored that proposal, and who do they work for (rank, company, affiliation). I would also appreciate learning from you which of Idaho's top politicians brought this upon us.	This is a Mountain Home AFB proposal developed in accordance with national defense policy. MHAFFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise.
53	Katie Fite WildLands Defense		Thursday, March 15, 2018	It appears that the existing Urban CAS training has been taking place just fine in and over the existing Military sites. See MHAFFB 2016 Convoy Training EA Excerpts (Attached to these comments) describing Urban CAS training and fake towns at Saylor Creek and Juniper Butte and many brand new Urban CAS facilities. Is this proposal, which assaults the health, well-being and property of a million Idaho civilians, an effort to clear out use at Saylor Creek and elsewhere, to make room for more Singapore or other foreign military training? Or to potentially make room for the F-35 War Planes the Idaho National Guard seeks to bed down at Gowen and the Boise Airport, and their foreseeable use of the remote Owyhee ranges like Saylor Creek or JBR?	Please see response to Comment 19.
54	Katie Fite WildLands Defense		Thursday, March 15, 2018	Where did the DOPAA proposal originate from? What large plan or plans is it linked to? Did it come from MHAFFB, the Air Force Secretary, or Department of Defense?	Please see response to Comment 52.
55	Katie Fite WildLands Defense		Thursday, March 15, 2018	What is the current human population underneath the 30 nautical mile diameter circles around the Nine Urban areas, and the flight paths the planes will take between them and commuting to MHAFFB? Please provide much clearer and detailed mapping of flight paths. It appears this activity will take place outside existing MTRs? What are the current areas and heights and other controls on military overflights across the project Footprint?	See DOPPA for proposed flight paths. Flight paths developed in accordance with FAA requirements and do not include MTRs, which are utilized for low-level flights.
56	Katie Fite WildLands Defense		Thursday, March 15, 2018	What is the population of the affected area projected to be in 2028? In 2038? This proposal will impact the lives, health, and well-being of half or more of Idaho citizens.	Noted.
57	Katie Fite WildLands Defense		Thursday, March 15, 2018	How many parks are under the overflight areas (15 NM CAS circles and throughout the circle as well as flight paths)? Note immense land area under this proposed new Range. How large is the land area, and what is the land ownership/status?	This action does not include development of a new range and utilizes existing airspace in accordance with FAA regulations.
58	Katie Fite WildLands Defense		Thursday, March 15, 2018	Is There a Link to National Guard OTA and Surroundings Activities, or Potential State of Idaho Land Actions? Do any Guard activities at Orchard Creek or elsewhere interface with USAF or IDANG training activities in any way? If so, where and how?	These are unrelated actions.
59	Katie Fite		Thursday, March 15,	Are there foreseeable changes – as large portions of the SRBOPA and	No land acquisition is included in

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	WildLands Defense		2018	OTA underlie the proposed Urban War range? What foreseeable state land actions may take place or may the military be contemplating in the project area and its surroundings?	the proposal.
60	Katie Fite WildLands Defense		Thursday, March 15, 2018	Has the FAA been allowing military activity in the 10,000 to 18,000 ft. zone already? If so, what NEPA or other analysis has been conducted? Is this found on aviation maps?	Military aircraft operate in accordance with FAA rules within the National Airspace System.
61	Katie Fite WildLands Defense		Thursday, March 15, 2018	Won't incessant military use of this space - including use of technology like lasers or other military devices - potentially interfere with civilian aircraft? Will civilian pilots or passengers in planes in this airspace, or above or below it, be exposed to various military devices? How is this airspace currently used and designated at present? Has there been a public process or NEPA process regarding it? If so, when and what did that entail?	366th FW is part of the National Airspace System and adhere to all rules and regulations required by FAA.
62	Katie Fite WildLands Defense		Katie Fite WildLands Defense	<i>Purpose. The purpose of the Proposed Action is to ensure F-15E aircrews from the 366 FW can conduct Urban CAS proficiency training within the full range of urban ground and airspace environments with ground support from JTACs. Only this combination of training conditions would adequately simulate the current mission realities of urban combat. ??? Really? Isn't tis whole process a fore-ordained conclusion, then?</i>	See purpose and need for the training in the DOPAA. The EA is not pre-decisional and will determine if a FONSI can be reached or an EIS is required.
63	Katie Fite WildLands Defense		Thursday, March 15, 2018	Please provide full baseline current site-specific data and analysis on these sensitive species occurrence, their habitats (and the quality and quantity of habitat), the status of their local and regional populations, and the threats these species currently face. How will this proposal add to the threats faced by these species? How much plane noise or other activity disturbance will they be exposed to? What will the impacts of day military activity be on these ? Of night activity?	Please see response to Comment 6.
64	Katie Fite WildLands Defense		Thursday, March 15, 2018	How much will plane noise increase over sage-grouse populations south of Twin Falls and Burley, fore example? Will overflights or other military activity displace water fowl using the Snake River, WMAs, or other areas? How does noise affect wetland and aquatic species?	This will be analyzed in the EA, as appropriate.
65	Katie Fite WildLands Defense		Thursday, March 15, 2018	What happens if a military plane (F-15, foreseeably F-35 or other) crashes or has to drop low or otherwise malfunctions over, into or near wetlands and the many species that inhabit them?	MHAFB follows defined mishap procedures.
66	Katie Fite WildLands Defense		Thursday, March 15, 2018	Has there been unauthorized or other Urban CAS activity taking place over Idaho citizen populations? Please specifically respond to this? ^{11 SEP} If so, when, where, how many sorties, and what on the ground activities? Has there been other CAS training – in a gray area between authorized or unauthorized? If so, how was it authorized?	Please see response to Comment 19.
67	Katie Fite WildLands Defense		Thursday, March 15, 2018	How far will noise travel, and at what levels, under various terrain and weather conditions – as this proposal would impose the activity during all types of weather conditions?	Noise will be analyzed in the EA, as appropriate.
68	Katie Fite		Thursday, March 15,	What is the SEL noise level for all of these training activities at all elevations they are being flown? What will it be with the DOPAA	Noise will be analyzed in the EA,

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	WildLands Defense		2018	proposal?	as appropriate.
69	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will civilians be able to sue the ground personnel?	Falls outside the scope of this EA.
70	Katie Fite WildLands Defense		Thursday, March 15, 2018	Just today there is news of a military plane crash, killing two pilots. It was over water. What if it was over top Boise?	Please see response to Comment 65.
71	Katie Fite WildLands Defense		Thursday, March 15, 2018	What is all the “electronic communications” equipment that will be used? Please be very specific and detail all the equipment and what it does and explain specifically how it will be used. Are threat emitters considered communications equipment? What type of radar will be used? What are potential hazards of health effects of this radar?	MHAFB utilizes UHF and VHF radio frequencies, same as commercial aircraft, in accordance with the National Airspace System
72	Katie Fite WildLands Defense		Thursday, March 15, 2018	What are the simulated munitions that will be used? What happens if someone makes a mistake and there are real munitions?	Munitions would not be on the aircraft. Computer software is used to simulate munitions.
73	Katie Fite WildLands Defense		Thursday, March 15, 2018	What devices will be used? Will threat emitters be used? What equipment that emits electromagnetic radiation will be used? What radars will be used? Please provide detailed information. Hasn't the military has developed new radar that can be harmful to humans and animals? What devices specifically will be used on the ground and in the air? How will these potentially impact humans, domestic animals, and wildlife?	Section 2.1.6 of the DOPAA describes the laser use that would be included in the proposed training.
74	Katie Fite WildLands Defense		Thursday, March 15, 2018	What technology and devices will be on the planes involved? Will flares, chaff, threat emitter devices, a range of lasers? What about on the ground? What exactly do all urban warfare training devices entail?	See proposed action in DOPPA.
75	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will apartment dwellers or office occupants in Boise's “Urban Canyons” become unwitting “targets” of war game technology such as this? Will they unknowingly look into lasers?	No civilian persons would be targeted as part of the proposed training.
76	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will lasers or other activity disturb or displace wildlife? Will pilots of small planes? What is the real risk of collateral damage? Will civilians unknowingly or accidentally become Targeted by close proximity to the military ground personnel playing War Games?	Laser safety information will be included in the EA.
77	Katie Fite WildLands Defense		Thursday, March 15, 2018	What are the exact specifications of what is an eye safe laser? Of what is not an eye safe laser? Do lasers switch back and forth between modes of intensity?	Laser safety information will be included in the EA. Section 2.1.6 of the DOPAA describes the laser use that would be included in the proposed training.
78	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will any of this interfere with increasing citizen use of or reliance on electronic devices – from garage door openers to timers to high tech equipment?	MHAFB operates under UHF and VHF frequencies. Garage door openers/timers do not operate on these frequencies.
79	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will IDANG or other Guard personnel be used?	The 124th ASOS supports the 366FW training.
80	Katie Fite		Thursday, March 15,	IDANG is seeking beddown of the noxiously loud F-35s. The DOPAA	Aircrews are defined as F-15

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	WildLands Defense		2018	states: "The Proposed Action would use existing aircrew personnel operating at Mountain Home AFB". Does this include pilots? How is an aircrew defined? This includes, Singapore, too. Will Singapore pilots train in F-15Es? Will Idaho's civilian population and our health and safety be sacrificed for training by military personnel from other bases and other countries.	pilots and F-15 WSO (Weapons System Operator). The proposed home action is for the 366th FW, which includes Singapore.
81	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will all pilots involved in this be based at MHAFB? Military bases often jostle for "ratings" with one another – so as to ensure maximum federal dollars flowing to them. That was certainly the case with MHAFB and the Base Realignment Commission in past years. Is this proposal partially related to that?	BRAC is not applicable. The action is proposed by the 366th FW.
82	Katie Fite WildLands Defense		Thursday, March 15, 2018	<i>Training off of Federal Property</i> --What are all local laws and ordinance referred to here? Does any of this War Game military invasion of public space, property and privacy violate the Idaho Constitution or the U. S. Constitution? <i>The DODI Applicability section states that it applies to: "...DoD forces (including general purpose forces (GPF) and special operations forces (SOF)) training off federal property in the United States or its territories ..."</i> . So does that mean if the War Games are taking place in the parking lot of the Federal Building, the BLM office, a USDA research lab, etc. – various DODI notification and other policies do not apply? <i>DODI (2) Individual education or training activities at non-DoD academic institutions, including field activities within their curriculum.</i> Does this mean a BSU ROTC group could form the basis for an exception? Please explain.	Sections 2.1 through 2.1.6 of the DOPAA describe the proposed air and ground operational activities that would be conducted for Urban CAS aircrew proficiency training.
83	Katie Fite WildLands Defense		Thursday, March 15, 2018	Does this mean the proposed War Game activity could be snuck in/shoe-horned in, under cover of a National Guard exercise or other activity? Could the military use something taking place at the OTA or Gowen Field as an excuse to conduct this? Has Urban CAS Training already been taking place in the proposed project War Game area using this or other loopholes?	Section 1.5 of the DOPAA provides the purpose of and need for the proposed training. Section 2.2 provides the selection standards used to identify urban centers located near Mountain Home AFB that would adequately support the training.
84	Katie Fite WildLands Defense		Thursday, March 15, 2018	Does the Air Force foresee or plan to use drones in association with any of the Urban CAS training/War Games of this proposal in any way?	No drones will be used in the proposed training action.
85	Katie Fite WildLands Defense		Thursday, March 15, 2018	If so, where and how? If so, how will this use impact people (annoying drone noise close to the ground, overflights over private property, etc.), startling animals (including wild animals which often have a strong negative reaction to drones). Example: Eagles and other birds of prey attack drones. There are nesting peregrine falcons in Boise's "Urban Canyons". Bighorn sheep and antelope are spooked and startled by them. What potential dangers are there?	See comment response # 84.
86	Katie Fite WildLands Defense		Thursday, March 15, 2018	What is by "unusual" maneuvering? Or by Tactics? Techniques? Procedures?	No aerial acrobatics or high- G maneuvers are included in the proposal.

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87	Katie Fite WildLands Defense		Thursday, March 15, 2018	<i>DODI (5) Aviation forces (not in conjunction with ground participants located off federal property) operating in accordance with Reference (d) ... WHAT does this mean?</i>	Not part of the proposed action to be analyzed.
88	Katie Fite WildLands Defense		Thursday, March 15, 2018	<i>It is DoD policy to: a. Use training environments off federal property when required once they have been properly coordinated with local (e.g., civil, tribal, and private) authorities and when the requirements of this instruction have been met. BUT didn't the DODI just state under applicability that if the training involves state sites, areas specifically for the purpose, private property, that such coordination with local authorities did not apply?</i>	Not part of the proposed action to be analyzed.
89	Katie Fite WildLands Defense		Thursday, March 15, 2018	<i>(2) Nature of operations (e.g., live fire, aviation, close quarter battle training [are CAS ground people included in this?], day or night operations, tactics, techniques, and procedures). (7) Presence, interaction, and applied capabilities of non-DoD agencies (e.g., law enforcement, Department of Energy, Department of Justice). ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.</i>	Will be analyzed in the EA, as appropriate.
90	Katie Fite WildLands Defense		Thursday, March 15, 2018	What does the Department of Justice have to do with this? Does the AF plan to use buildings where federal workers are housed? If so, will the workers be informed?	See propose action in DOPAA.
91	Katie Fite WildLands Defense		Thursday, March 15, 2018	will THIS type of radar and imaging be used –spying inside people's pickups, house windows, etc. as the “War Games” are played?	Not part of the proposed action to be analyzed.
92	Katie Fite WildLands Defense		Thursday, March 15, 2018	(9) Nature of PA activities (active or passive) and presence. What does this mean? Define “PA” in detail.	Not part of the proposed action to be analyzed.
93	Katie Fite WildLands Defense		Thursday, March 15, 2018	What happens to a city block or neighborhood if an F-15 crashes? Will the area be evacuated? What toxic substances will people potentially be exposed to? What happens to someone if the wrong laser or laser setting or other harmful device injures a person in any way?	See comment response #65.
94	Katie Fite WildLands Defense		Thursday, March 15, 2018	what is the SEL and other real noise levels that will be encountered by citizens?	Noise will be analyzed in the EA.
95	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will all these agreements be posted on-line and be public knowledge so civilians can avoid use or patronage of the affected private properties so as not to expose themselves to ground War Games? Will WARNING Military Training and Devices! War Games in Progress signs be posted on buildings sites/facilities/locales to be used for the War Game training –or those areas covered by the “MOAs” referenced below? <i>RMT events that are recurring under the same general concept of operations (CONOPS) at the same location may be based on a documented CONOPS and a memorandum of agreement (MOA) with the appropriate authorizing civilian officials or a land use agreement with the property owner(s). The terms of the MOA will comply with the</i>	The proposal does not include private landholdings. See description of proposed action in DOPAA.

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				<i>requirements of this instruction and include planned dates of execution</i>	
96	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will there be daily and nightly alerts so that visitors to Idaho urban areas are not unwillingly exposed to /caught up in these exercises? Will there be training warning signs posted at the Boise airport? At Freeway exits? Or by buildings where this activity/War Games are taking place?	Public safety would be coordinated through local government and law enforcement, as appropriate.
97	Katie Fite WildLands Defense		Thursday, March 15, 2018	<p>We have also found THIS link to an attachment to a Marine description of DODI 1322.28. It gives the military extensive discretion, through use of non-binding, weak and uncertain terms like "when appropriate". This is fraught with loopholes.http://www.marines.mil/News/Messages/Messages-Display/Article/896431/realistic-military-training-off-federal-real-property/"REF (B) CONTAINS A NUMBER OF ADDITIONAL REQUIREMENTS FOR COORDINATION WITH CIVILIAN AND MILITARY OFFICIALS WHEN PLANNING RMT OFF FEDERAL REAL PROPERTY. IN ADDITION TO THE REQUIREMENTS CONTAINED IN REF (A), COMMANDERS WILL ALSO TAKE INTO ACCOUNT THESE ADDITIONAL REQUIREMENTS WHEN PLANNING RMT OFF FEDERAL REAL PROPERTY. THE ADDITIONAL REQUIREMENTS ARE:</p> <p>2.A. WHEN APPROPRIATE, COMMANDERS SHALL COORDINATE WITH APPROPRIATE CIVILIAN LAW ENFORCEMENT AGENCIES (LEA) TO RECEIVE AN ORIENTATION BRIEFING ON THE AREA IN WHICH THE TRAINING WILL BE CONDUCTED.</p> <p>2.B. WHEN APPROPRIATE, PLANNING SHALL INCLUDE A MEDICAL EVACUATION PLAN FOR PARTICIPATING PERSONNEL AS WELL AS A COMMUNICATIONS PLAN FOR MILITARY ELEMENTS CONDUCTING THE TRAINING.</p> <p>2.C. IN ADDITION TO CONSULTING WITH CIVILIAN LEA, WHEN DEEMED APPROPRIATE, COMMANDERS WILL SEEK INPUT FROM MILITARY POLICE LOCATED IN THE VICINITY OF THE PROPOSED TRAINING".</p> <p>Does the AF have something similar?</p>	The 366th FW adheres to all DOD rules and requirements.
98	Katie Fite WildLands Defense		Thursday, March 15, 2018	What existing agreements are in place with local officials.	Thank you for your comment. The proposed training would be conducted in accordance with existing regulatory, legal, and safety requirements, as well as in accordance with the DOD 1322.28.
99	Katie Fite WildLands Defense		Thursday, March 15, 2018	Detailed analysis of the pollution from the thousands of overflights in and around the CAS wheel and in transit to MHAFB must be provided. How will the impacts vary/pollution stagnate --- under varying weather conditions? How might these levels change under various foreseeable different war plane type scenarios (such as the F-35). WHAT will these levels be for F-15s?	Air quality analysis will be included in the EA.

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100	Katie Fite WildLands Defense		Thursday, March 15, 2018	How much fuel (gallons) will be burned annually with F-15s? With F-35s or other foreseeable planes using the range? Will there be in-air refueling and chance of spills?	The proposed action does not increase current F-15E baseline fuel consumption.
101	Katie Fite WildLands Defense		Thursday, March 15, 2018	How much will War Game activity contrail marring of skies and their pollution increase with the War Games intensive activity? What is the current baseline –under all weather conditions? How much less sun and blue sky will each area and the total area receive? How will that impact people's health and state of mind?	Please see response to Comment 6.
102	Katie Fite WildLands Defense		Thursday, March 15, 2018	How much closer will this push Boise and the Treasure Valley to Air Quality non-attainment? How will this pollute the air of surrounding public wild lands, where the pollution may ultimately end up, as well? How will this affect quality of life, or the climate? Blah, gray skies affect people's mood and sense of well being.	Air quality analysis will be included in the EA.
103	Katie Fite WildLands Defense		Thursday, March 15, 2018	What is the current military air pollution level from all planes (including transients that make up a significant portion of the Boise airport military planes)?	Air quality analysis will be included in the EA.
104	Katie Fite WildLands Defense		Thursday, March 15, 2018	Won't some areas be overflowed time after time in transit – and so they will suffer larger pollution loads? Won't the Large and Medium cities suffer higher loads since there are fewer of them, too? (And thus they will suffer more training).	Air quality analysis will be included in the EA.
105	Katie Fite WildLands Defense		Thursday, March 15, 2018	How many contrails on the average day or night are in the skies over these nine cities 15 NM circles now? How many are military sources? How larger are military contrails?	Contrails are water vapor and are not generated at the flying altitudes in the proposed action.
106	Katie Fite WildLands Defense		Thursday, March 15, 2018	Where are all MTRs, or other routes used by the planes - and what are flight levels? What are other military sources of contrails and pollution? How about civilian aircraft in the area? The Boise airport recently announced that use had increased. HOW much more pollution can the airshed withstand andnot be pushed into non-attainment – including as the population increases? The military should be looking to DECREASE its pollution in this airshed, and its climate change footprint (which also must be assessed in detail here) rather than increase it?	See DOPPA for proposed flight paths. Flight paths developed in accordance with FAA requirements and do not include MTRs, which are utilized for low-level flights. Air quality analysis will be included in the EA.
107	Katie Fite WildLands Defense		Thursday, March 15, 2018	To what degree will overflights – for example, going back and forth to Boise or Burley from MHAFB– occur over other cities/towns - thus significantly increasing disturbance to the poor citizens who inhabit these areas? This will take place over many poorer communities in Idaho- so aspects of the War Game proposal are a matter of economic justice. Just look at the nightmare of circles near Glenns Ferry, for example. Further, will Urban area training disproportionately impact low income areas of cities?	Please see response to Comment 6.
108	Katie Fite WildLands Defense		Thursday, March 15, 2018	What toxic, dangerous or hazardous materials are there in F-15s, and other military planes that may potentially or foreseeably use this War Game Range in the future – including F-35s? Are the stealth coating or other aircraft materials carcinogenic?	Section 2.1.1 specifies the aircraft that would be used for the proposed training. Stealth aircraft /technologies and F-35s are not included in the proposed action.

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109	Katie Fite WildLands Defense		Thursday, March 15, 2018	Why does the Air Force consider 9:59 pm to be "daytime"?	Thank you for your comment.
110	Katie Fite WildLands Defense		Thursday, March 15, 2018	What will be the SEL noise citizens will be exposed to at 10,000 ft.? What might cause planes to fly lower than 10,000 ft. Will any of these planes be landing or originating from the Boise Airport, for example if experiencing difficulties?	F-15E aircraft would not fly below 10,000 ft. AGL. The proposed training does not include utilizing the Boise airport.
111	Katie Fite WildLands Defense		Thursday, March 15, 2018	<i>Concurrent training operations at more than one urban center would be expected for 20 to 30 percent of the proposed maximum number of training days (i.e., 260) annually across all urban centers. The ability to operate at more than one urban center would allow the 366 FW the flexibility to surge proficiency training operations without concentrating the impacts of increased operations over any one urban center. Concurrent operations would be conducted at an anticipated maximum of two of the identified urban centers per training day and could involve day or day-night training operations.</i> ^[SEP] Does concurrent mean occurring at the exact same time or occurring at some point within the 24 hour period?	Concurrent means two aircraft operating at different training locations at the same time.
112	Katie Fite WildLands Defense		Thursday, March 15, 2018	The DOPAA states: <i>In such instances, vehicles would be momentarily parked along the roadside, sidewalk, or in a surface parking lot. Operations would not require the use of any buildings, and would not be conducted near schools, hospitals, churches, or cemeteries.</i> ^[SEP] THIS is contradicted by descriptions elsewhere in the DOPAA of use of buildings and other disguised ground personnel activities. Just because use of buildings is not "required" does not mean it will not take place! Define "near" – what specific distance is "near"? Won't vehicles drive by these sites, and isn't part of the War Game targeting people in vehicles, too? Won't planes fly over these sites, too?	Sections 2.1 through 2.1.6 of the DOPAA specify the air and ground operational activities that would occur as part of the proposed Urban CAS training.. "Near" is defined in accordance with standard dictionary definitions.
113	Katie Fite WildLands Defense		Thursday, March 15, 2018	<i>FFOR would consist of up to five civilian type vehicles with up to three passengers per operating vehicle. FFORs would direct aircraft using a variety of tactical communication devices (e.g., frequency modulation radio, very high frequency radio, ultra high frequency, and satellite communication radios). Additionally, FFOR may use data link systems to receive or transmit analog or digital information to the aircrew. Each of these devices would be operated on pre- approved, dedicated military frequencies. OPFOR would use up to five civilian type vehicles in various convoy scenarios with up to four passengers per vehicle.</i> ^[SEP] Just what information will be transmitted? Will it include video of people's homes, cars, property, the people themselves, their animals, etc.? What will happen to any video and any data that may have personal information of a sort, or images of citizens or their property?	The proposed action is limited to military training and does not include data collection (photos, videos, voice recordings, etc...) of private citizens or their property.
114	Katie Fite WildLands Defense		Thursday, March 15, 2018	<i>The aircraft would separate from the CAS wheel, fly toward the urban center point, and be guided with instrumentation and communication to identify, track, and simulate neutralization of the OPFOR. The two aircraft would fly throughout the airspace overlying the city in a wedge formation where the lead aircraft would be positioned at a lower altitude</i>	The DOPAA defines multiple urban center requirements, which avoids concentration of operations over any one urban center.

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				<i>and ahead of the second aircraft. The second aircraft serves to cover the lead aircraft from a higher altitude and reasonable distance behind, where visibility surrounding the first aircraft can be maintained. Flight tracking of OPFOR would continue until the point of simulated weapons fire. Upon mission completion, the aircraft would return to the installation.</i> Does this mean that the center of urban Areas, i.e. the places with the highest population densities and most civilians to be exposed, annoyed and harmed - would most suffer this disturbance the most?	
115	Katie Fite WildLands Defense		Thursday, March 15, 2018	The DOPAA also mentions fake Bombing. What does the fake Bombing entail? What devices are used?	Proposed action includes only computer simulated targeting.
116	Katie Fite WildLands Defense		Thursday, March 15, 2018	The DOPAA states: <i>All interactions between air and ground teams would be achieved through use of electronic equipment including tactical communication radios (e.g., frequency modulation, very high frequency, ultra high frequency, and satellite communication), navigational GPS for maintaining awareness of target locations, low-power, eye-safe infrared training lasers for marking targets, and computer simulation systems on board the aircraft.</i> What are the specific frequency ranges that the devices in the air and on the ground will be using? How might these high frequencies, and lasers, or other devices that may be used impact people, domestic animals, and wildlife? Aren't lasers used as wildlife deterrents? Aren't some animals' eyes more sensitive than humans, and retinas likely to be damaged? Won't lasers used at night disturb wildlife?	Laser use and safety information will be included in the EA.
117	Katie Fite WildLands Defense		Thursday, March 15, 2018	This proposes to beddown additional foreign (Singapore) planes at MHAFB. Is this massive shift of CAS War Game training onto a civilian population to potentially make room for MORE foreign military training by Singapore at Saylor Creek/Owyhee Ranges? Or are they the new pilots that will need more training - that are referenced in the DOPAA? How foreseeable is it that various Singapore planes will be using the CAS airspace in the future? Or that Singapore pilots will be flying F-15Es for Urban War training over a million civilians?	The proposed training is for the 366th FW, which includes Singapore.
118	Katie Fite WildLands Defense		Thursday, March 15, 2018	What are all the components of the military plan that is unfolding? Segmenting and piece-mealing connected actions is a violation of NEPA.	The proposed action is defined in the DOPAA and will be analyzed in the EA to determine if a FONSI can be reached or an EIS is required.
119	Katie Fite WildLands Defense		Thursday, March 15, 2018	We requested this reference from Ms. Shaver, and were told it was not complete yet. So how can the Air Force cite it as a basis for the DOPAA?	The draft AICUZ study is not a baseline threshold for the proposed action. Noise modeling and analysis will be included in the EA.
120	Katie Fite WildLands Defense		Thursday, March 15, 2018	THIS entire DOPAA claim is shown to be false by the 2016 Convoy Training EA, for the MHRC. SEE Attached excerpts, and Convoy EA. Then how has the Air Force managed to proficiently train all these	See the purpose and need in the DOPPA.

#	Commenter	Type of Content	Date Received	Comment	Government Response
				years?	
121	Katie Fite WildLands Defense		Thursday, March 15, 2018	What will the infrasound levels be	Noise analysis will be included in the EA.
122	Katie Fite WildLands Defense		Thursday, March 15, 2018	The DOPAA refers to considerable Urban War Game activity in inclement weather. How will this impact lasers and other devices (of all kinds) being used? What kind of laser transmits video?	No lasers transmit video. Laser use and safety information will be included in the EA.
123	Katie Fite WildLands Defense		Thursday, March 15, 2018	Is any such use planned or foreseeable in any activity described below and in this article associated with the MHAFB proposed Urban War Range? The laser technology offers several benefits over conventional RF or microwave systems for tactical operations. Although traditional RF and microwave frequencies are excelling on many fronts, they become vulnerable or non-effective under certain scenarios such as real-time threats, tapping, jamming, low bit rate, high latency, large size, weight and power (SWaP). Since the bandwidth provided by the optical system (due to high carrier frequency) is much higher than the radio or microwave systems', lasers are capable of disseminating large volumes of data or video information in the battlefield, often in real time".	Laser use and safety information will be included in the EA.
124	Katie Fite WildLands Defense		Thursday, March 15, 2018	What if civilians accidentally get "illuminated" by a laser (or become a "target of opportunity" as happens out on areas of the MHAFB at times)— and don't want to be?	The proposed action does not include the targeting of civilian persons.
125	Katie Fite WildLands Defense		Thursday, March 15, 2018	What TYPES of radar will planes be using, and what are their effects and potential risks??	APG-82 and APG-70.
126	Katie Fite WildLands Defense		Thursday, March 15, 2018	Will there be UAVs?	No. Section 2.1.1 specifies the aircraft that will be used for the proposed training.
127	Katie Fite WildLands Defense		Thursday, March 15, 2018	Does AF plan for the Urban War Range described in the DOPAA to have a vehicle pulling a "tow target"? Will there be "targets" inside buildings?	The proposed action does not include establishing a range. No targets in buildings or tow targets are proposed.
128	Katie Fite WildLands Defense		Thursday, March 15, 2018	The Saylor Creek Range Complex is within the 15 NM zone of impact of Urban areas - how will this impact activity?	Not applicable to the proposed action.
129	John Robison - Idaho Conservation League		Monday, March 5, 2018	Thank you for considering our comments on the Proposed Action and Alternatives for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters who have a deep personal interest in ensuring that military training projects are designed to avoid, minimize or mitigate impacts on public health, quality of life, and wildlife.	Thank you for your comment.

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131	John Robison - Idaho Conservation League		Monday, March 5, 2018	The description of the proposed action and alternatives are part of an Environmental Assessment (EA) which will disclose the environmental effects of Urban Close Air Support air and ground training spaces near Mountain Home Air Force Base. The document describes a series of training measures in large, medium and small urban centers in southwest Idaho. However, this document does not go into detail into the actual environmental effects of the proposed action.	The DOPAA is a proposed action. An EA is being prepared to analyze environmental effects of the proposed action.
132	John Robison - Idaho Conservation League		Monday, March 5, 2018	The full Environmental Assessment must disclose these effects to the public. In addition, the Air Force may need to develop additional alternatives to address concerns and issues raised by the public.	Thank you for your comment.
133	John Robison - Idaho Conservation League		Monday, March 5, 2018	We recommend that the Air Force ensure that public safety is fully protected during military training exercises. We note that members of the public may become concerned about unidentified ground support team members and mistake training activities as a real security threat, exposing members of the public and ground support personnel to harm. Please describe how such scenarios will be handled and what types of coordination will occur with municipalities and local and state law enforcement agencies.	366th FW adheres to all DOD rules and regulations.
134	John Robison - Idaho Conservation League		Monday, March 5, 2018	The Environmental Assessment should also assess potential negative effects of aircraft noise on members of the public living and working in the training area as well as on wildlife. The timing, duration and intensity of these activities should also be factored into the analysis and the determination of significance. We recommend that the Air Force develop additional alternatives and design features to address these concerns.	Noise analysis will be included in the EA.
135	John Bertram		27-Mar-18	Such F-15 training over Boise and the Region would be deafening. Studies have found that aircraft noise significantly impairs health. Excessive noise (above 55dB) can cause hearing impairment, hypertension, and ischemic heart disease and sleep disturbance.	Noise analysis will be included in the EA.
136	John Bertram		27-Mar-18	There is also a good chance for accidents over urban areas that would lead to loss of life and damage. Likewise, Boise already suffers from diminishing air quality and this training would only aggravate poor air quality. What is the amount of F-15 exhaust pollution?	Noise and air quality analysis will be included in the EA.
137	John Bertram		27-Mar-18	Selecting Boise as a CAS would be extremely divisive to Boise's residential quality and healthy slifestyle. Such training would be an adverse condition. There are better options available such as creating a mock city at the 110,000 acre Saylor Creek Bombing and Training Range.	See purpose and need in the DOPAA.
138	John Bertram		27-Mar-18	Also very concered that USAF cancelled the recent public information meeting at the Boise Public Library. How can we share our concerns if there are no efforts to inform the public of the impacts of Urban Close Air Support?	Public outreach is ongoing in accordance with NEPA requirements.
139	Matthew Kohn		15-Apr-18	I am writing as a private citizen to strongly oppose any efforts to conduct urban military training both overhead and on the streets of	Thank you for your comments. Noise analysis will be included in

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				Boise. Frankly, I'm shocked anyone would even propose this. Your proposal to have military personnel disguised as civilians really means you're using me (a Boisean) to train spies. I object to being used in this way. And carrying out these games in the densest population in the state dramatically increases noise and danger of accidents. Last, there was pitifully inadequate notice given for comments. The Air Force is coming across like it's trying to pull a fast one on us. Even if you get your way, you will seriously damage your support here.	the EA along with aircraft mishap data.
140	Brent Mathieu		16-Apr-18	<p>1) Potential collisions with civilian aircraft above our city. The risk of crash landings in our city. Depending on F15 speed, and maneuvers, above Boise near the airport and flight paths, there would be increased risk of collision, and extensive civilian casualties and property damage from a crash. Please study how to protect our people and property.</p> <p>2) Please prepare contingency plans and policy to compensate for any loss of human lives and property. I request that these plans be transparent, and publicly presented. Please assure our public that in the event of calamity there would be heart full efforts for compensation, and amends.</p> <p>3) Please fully explore alternate training via simulators.</p> <p>4) Please, advocate at the level of the federal administration's Cabinet, Departments of Defense, State and Office of the President to create a Department of Peace. We, the people, of these United States, and our planet need to make peace our priority over war. Military action needs to be the last resort. This is particularly true in a highly populated urban center. I have seen the photos of the heart breaking destruction of cities such as Aleppo, Syria. The best way to prevent terrorism, and enemy consciousness which foster conflict and war, is to sow seeds of peace. "Blessed are the peace makers".</p> <p>5) An idea to mitigate impact from these training's, if truly necessary, would be to balance by giving MHAFB expanded mission to foster homeland security in Idaho, via collaboration and investment in peace building permaculture science, technology, research and development. For instance, let MHAFB model energy conservation; local secure food sources to feed the base (aquaculture, hydroponics, green houses); alternative energy systems for independent, reliable, non grid based electric power (wind, solar, geothermal, microhydro generators rather than back up diesel generators). This would diversify the economy of the base, and benefit the region nearby. An offer of such positive modeling/show casing would be an olive branch to foster trust between civilians and military personnel.</p>	Aircraft mishap data will be included in the EA. All airspace above proposed urban areas is coordinated with FAA. Creating a Department of Peace is outside the scope of the EA. In accordance with NEPA, mitigation is required when there is a significant impact. The potential for significant impacts will be analyzed in the EA. If significant impacts are identified, the Air Force may choose to abandon/alter the proposed action or conduct an EIS.
141	Joanie Fauci		16-Apr-18	I am not in favor of the Air Force doing Urban Close Air Support in Idaho or in any live situation. I believe simulation technology is good enough for this and every other situation. I also don't even think we should be wasting tax payer money on planes or flights anymore. We	Thank you for your comment.

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				<p>have the technology for doing warfare without using people. It is expensive and dangerous to fly planes and use people. The future for the military is all technical, electronic, from afar, using drones and unmanned things. Accidents and mistakes do happen. How can we be assured the bad laser will never be turned on? We can't. Many people have worked hard to make Boise a great place to live. This proposal puts all that at risk. We cherish our peace and quiet. We will not accept 2 planes at a time, 4 times a day...8 planes each of the flying days. Each time the planes are up, they will be airborne 60-90 minutes. During that time, they may circle around 20 times. Eight planes circling 20 times equals 160 overhead passes, potentially 260 days per year! Even though all those flying days won't be over Boise, it will end our peace and quiet, no matter how high the planes fly. It is unacceptable for our quality of life. Boise is currently a great place to live. It is commonly written up as so. Our economy is booming. We do not need or want overhead military flights. Other items I have issue with in the current plan are: 1. There is no ending date/time. 2. It should be clearly stated that this is only for Mountain Home personnel, no visiting military crews can use the range. 3. It should be clearly stated that if planes other than the F15 EVER wanted to do something similar they would have to go through the WHOLE process again. 4. Ground vehicles and personnel should be clearly marked. 5. The EA and EIS for the ground plan/crew should be combined with this plan. They are one project! The presenters couldn't commit to anything for the ground team. Where is the NEPA process for that? Surely having them driving through Boise traffic will have an impact. It was truthfully stated in the meeting that the Air Force had been doing this in the past without having gone through the process. But how can we feel trusting that they won't do similar incorrect things in the future. They couldn't even say if this was happening in any other city. But then they said it had happened in Las Vegas. Something fishy is going on. I want to be a stakeholder for this and other Mountain Home Air Force issues. Please add me to the list.</p>	
142	Heather Steele		13-Apr-18	<p>I am strongly opposed to the proposal to conduct urban military training in the sky above and on the streets of Boise. I object to the hazards of increased air and noise pollution and and increased potential for crashes in precisely the areas of the state with the highest density populations. The day and night trainings would significantly impact our quality of life and the peacefulness of our city. The idea of military trainees playing war games in our midst while disguised as civilians is frankly creepy.</p> <p>I further object to the insufficient public notice given for informational meetings and the ridiculously short window allowed for collection of public comments. These things lead me to believe that the Air Force hopes to quietly approve the trainings without alerting citizens to the plan so that by the time they learn of it, it will be too late. We deserve</p>	Thank you for your comment.

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				better.	
143	Kerry Cooke		14-Apr-18		Sections 2.1 through 2.1.6 describe the air and ground operational activities tha would be involved with the proposed Urban CAS aircrew proficiency training. Please also see response to Comment 4.
144	Ann DeBolt		16-Apr-18		Thank you for your comment.
145	Katie Fite		14-Apr-18		Thank you for your comment. Please see response to Comment 6. Airspace management and flight safety will be addressed in the EA.
146	Suzanne Troje		13-Apr-18		Thank you for your comment. Please see response to Comment 6.
147	Gwynne McElhinney		13-Apr-18	1. What is the public process for determining if this training should happen or not? 2. Why can't virtual relaiity activities suffice, as they do for so much related training? 3. If approved, when would this training for close air support in urban settings begin/end. 4. What is the window of time that the Air Force intends to conduct these exercises (for 6 months in 2018? into 2019? 3-5 years out? for the forseeable future?) 5. How many over-flights per day, per week, per year are planned in each community? 6. Will jets fly M-F and/or over weekends? Daytime only or at night, too? 7. How will sites be selected/scheduled and will each town have the same # of flights? 8. What if Boise proves to be the best site for simulation (due to its size)? Does thgat mean we will have a disproportionate amount of training exercises conducted here? 9. What other states (where F-15 are based) have had urban settings used for close air support training such as that proposed for southern Idaho - describe those situations in detail (begun how recently? at what intensity & duration?) 10. What problems arose for the civilian populartions affected and how were these issues solved? 11. Were residents satisfied with the mitigation efforts? 12. Given the known risks to the health and welfare of 500,000 Idahoans living in the proposed mock combat zone, what justifies doing this type of training at all? In other words, why has the Air Force always flown over unpopulated, wild land training ranges? To avoid harm to humans, that's why! 13. Because F-15 air crews have already, safely & successfully conducted military training operations in deployed urban situations (using unpopulated ranges for training purposes), then the proposed setting change (to domestic homeland communitites) is both unnecessary and dangerous to American citizens.	Section 1.5 describes the purpose of and need for the proposed aircrew proficiency training.
148	Roger Rosentale		13-Apr-18	Please stop using taxpaers \$ and stop the noise. How stupid it is to do	Thank you for your comment.

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				this over Boise. We do not want the Air Force here.	
149	Mike Adams		13-Apr-18	Emergency response plan? Will law enforcement be able to use lasers for high speed chases? Try VRI Arcade for virtual reality training from basic to advanced. EOD and like response. Unmarked/Odd vehicles with radios might get people overly paranoid.	Section 2.1.5 describes the ground operational activities that would be conducted as part of the proposed Urban CAS training.
150	Helen Neville		13-Apr-18	I am generally against urban warfare training in Boise. I do not see that the supposed "benefits" in any way even approach the costs to this community = totally against!	Thank you for your comment.
151	Carolyn Fabis		13-Apr-18	I oppose urban combat training in the air and on the ground in Boise or the surrounding cities. My concerns: mishap accidents hurting civilians, pollution in our airspace, the fact there is no end date on this combat training, militarization drawing worldwide attention to Boise, enemies choosing to target our city, noise pollution, and the fact it is not being done anywhere else in the U.S. Why not keep it simulated in mock cities?	Section 1.5 describes the purpose of and need for the proposed aircrew proficiency training. Also, please see response to Comment 6.
152	David R. Frazier		13-Apr-18	Ground OPS is major issue. All troops should have uniform and written orders on them. Only official USAF vehicles should be used. Civilians are armed!	Section 2.1.5 describes the ground operational activities that would be conducted as part of the proposed Urban CAS training.
153	Craig Gehrke		13-Apr-18	Thank you for holding the public scoping meeting. I do not support the Urban CAS project over Boise. It does not fit with the livability status of Boise. We should not add the stress of military operation simulation to a population already stressed by shooter alerts and other modern day stressors. This truly seems like just another shiny object the Air Force thinks it needs, just like the composite wing idea over 20 years ago.	Thank you for your comment.
154	Tim Yoder		13-Apr-18	I do not believe the Air Force has demonstrated a need for this urban disruption of our fine city. Many other training options are available and have been used with success before. I believe we don't need nor morally should be practicing this in cities or, really anywhere to promote urban warfare. Boise is a welcoming city with a significant refugee population. This proposal must be very frightening for these people. We also need no more noise and air pollution in this valley.	Thank you for your comment.
155	Gary E. Richardson		13-Apr-18	Public info/involvement process is wanting. Very inadequate notice of these scoping meetings, including notice of cancellation of prior scheduled meeting. 4-6pm on a Friday is not the time to seek public input.	Thank you for your comment.
156	Robert Hoppie		13-Apr-18	No Action Alternative - ONLY viable alternative for the Treasure Valley area. Treasure Valley = all of Ada County and western Idaho. CAS operations are not acceptable in the most populated area in all of Idaho.	Thank you for your comment.
157	Diann Stone		13-Apr-18	I am concerned about air quality from pollutants. Is there data available from pollutants from multiple flights for F-15s? There needs to be a sunset clause. Use simulators for most training. I do not like our	Please see response to Comment 6.

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				military targeting foreign population areas. Wait for enemy to leave urban area. Fight combat outside urban areas. More meetings in different areas of Boise, generally in the evening 7-9pm. Give us numbers of how many maximum minutes per day of possible flights.	
158	Anne Hausrath		13-Apr-18	Please hold another well advertised scoping hearing and include JTAC expert.	Thank you for your comment.
159	Paul Cunningham		13-Apr-18	If this urban training area is approved, the prospect of other air force squadrons and other service branches then wanting to come here concerns me. That is, I don't want Boise to become the de facto urban training area for the country. As a combat veteran, I understand and support the need to train prior to deploying.	The proposed action is for the MHAFB 366th FW.
160	MaryLou Hall		13-Apr-18	I appreciate the scoping meeting today and ask for another one when data is collected. At this point, I feel that Boise and surrounding cities do not need this impact on our communities.	Thank you for your comment.
161	Katie Fite		13-Apr-18	Wildlands Defense strongly opposes the proposal. It endangers Idaho citizens and is hazardous to us all. An EIS must be prepared. A wide range of alternatives must be considered. Use Saylor Cerrk. Create "chaos" with vehicles there.	Please see response to Comment 6.
162	No Name Provided		13-Apr-18	Question - so flying @ 10,000 feet, what do tall buildings have to do with it? No, No, No. First F-35 - Now F-15s. What next? Military planees are already noisy! Boise City is not a military base!	Thank you for your comment.
163	Jack Bennett		13-Apr-18	Would like data on maximum # of "sorties" likely over Boise.	Please see DOPPA.
164	Carol Casler		17-Apr-18		All airspace above proposed urban areas is coordinated with FAA.
165	Dale Reynolds		18-Apr-18	I am a private citizen, live in Boise, and will be directly affected by this proposed project. I support the AFB but do not understand why our city needs to be part of this urban training. Our city is growing, we are getting more traffic and congestion. We do not need more air traffic and disturbance from urban training. The AFB has many training ranges and simulators where this training can be conducted without disrupting the citizens of Boise. I have lived in Boise for 54 years and like many others, enjoy the quality of life that Boise provides. Please find an alternative location or simulation for this urban training and do not bring this to Boise.	Thank you for your comment. Section 1.5 describes the purpose of and need for the proposed training. Section 2.2 provides the selection standards used to identify the urban centers near Mountain Home AFB that could adequately support the training.
166	Diane Ronayne		17-Apr-18	Here are my concerns: 1. Safety of the civilian population. Accidents DO happen, and with more than one training operation every day, each involving two to four aircraft and numerous land vehicles, the odds are good that civilians will be injured, especially with the emphasis on night training. Is there redress for that? 2. Noise and air pollution from aircraft. 3. Opportunity for additional non-USAF planes and personnel to use this war-game theater after it is operational. Apparently Singapore	Please see response to Comment 6. Airspace management and flight safety will be addressed in the EA.

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				trains its military in Idaho. Will other nations come here, too?	
167	Kenneth L. Pidjeon		17-Apr-18	<p>Because the proposed UCAS covers at least 20% of Idaho's population, it would appear a formal EIS is in order due to the possible economic and environmental impacts statewide.</p> <p>What other urban areas (by name or area), in the United States or other countries, are used, or have been used, for UCAS training by any USAF or Air National Guard organization?</p> <p>If other areas already exist, why cannot those existing areas be used in lieu of Idaho areas?</p> <p>What Air Force doctrine(s) requires this training be conducted in a real urban area (as opposed to a military training area)?</p> <p>With whom, or what organization, did this proposal for UCAS in Idaho originate from either inside the USAF organization or outside of it?</p> <p>Why cannot simulators be used for UCAS training?</p> <p>What State, County, or Local elected officials have you communicated with (verbally or in writing) regarding this proposal and what were their comments about it - either individually or collectively?</p> <p>When were these contacts with State, County, or Local elected officials made (time frame such as July 2017 through February 2018)?</p> <p>Why was only one scoping meeting (rather than two or more) held for Boise, Idaho (the largest city in the State)?</p> <p>It is my understanding this proposal was withdrawn in the last year or so because it was considered "too controversial". What has changed with this proposal?</p> <p>Will the FAA have to approve this proposal and / or issue restricted air space boundaries or military operating area boundaries?</p> <p>How will you coordinate UCAS training with local airports and the restricted airspace at the Orchard Combat Training Center southeast of Boise?</p> <p>The time frame for submitting written comments after the scoping meetings are over is less than 30 days (actually less than 2 working days after the Boise scoping meeting). Please explain why the comment period following the last scoping is less than 30 days and please explain why it could not have been at least a 30 day comment period.</p>	Please see response to Comment 6. Airspace management and flight safety will be addressed in the EA.
168	Anne Hausrath		17-Apr-18	I have several concerns regarding the current CAS proposal: I am very concerned by the nature of the training. I do not want our city to be the	Thank you for your comment. Laser use and safety will be

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				<p>site of "war games". I strenuously object to the presence of "friendly" and "enemy" teams playing hide and seek in our community. I object to the presence of unmarked vehicles and plain clothes participants; if you are going to use our community for training, we the people need to know who you are. We have been told "See something; Say something". Do you honestly think that we won't be curious, suspicious about teams of strangers stopping beside the roadside day or night? Your proposal seems to blur the line between civilian and military, a move that I consider to be threatening to our very form of government. I noted what I think are discrepancies between the written proposal and what I understood at the Friday meeting. The proposal states: "Ground-level observers may be positioned on upper floors of buildings to improve visibility." P. 1-2 and "To facilitate aircrew tracking of identified targets, lead JTACs may be positioned in or on buildings in areas that provide broad lines of sight." p. 1-4. Yet I understood from what we were told on Friday that there would be no ground personnel in buildings. I ask that this be clarified and that the written proposal reflect the correct information. Also, the written proposal states "...In these situations, ground teams (eg., JTACS) mark and designate their positions or CAS target locations visually with an infrared laser pointer." p. 1-3 and "The use of GPS and handheld laser pointers or designators eases the problems associated with night navigation, orientation, and target identification. p 1-3. I believe we were told on Friday that ground personnel would not be using lasers. Again, I request that this issue be clarified. If indeed lasers will be use by ground personnel, we need to be assured by an independent authority that the type of lasers used will pose absolutely no harm to residents. The written proposal should reflect the correct information. Your proposal implies close coordination with local law enforcement. I ask that you calculate the proposed amount of time required of the Boise Police Department and that if this proposal is implemented that you reimburse the Boise Police Dept. for their time. With any proposal, it is helpful to learn the experience of other cities that have participated in similar military exercises. I ask that the Air Force release information about similar training exercises which have been conducted anywhere in the U.S. The project appears to be open ended with no sunset clause. I ask that you impose a limit: two years, three years? and then if the proposal is implemented require review by all stakeholders at the end of the time period.</p>	addressed in the EA. Section 2.1.6 of the DOPAA describes the laser activities that would be conducted for the proposed training.
169	Todd Kurowski		2-May-18	Instead of "Permanent" could this expire after a period of time or go up for revisal? Is there opportunities to participate/volunteer?	Thank you for your comment.
170	Lisa Straves		2-May-18	I want to ensure wildlife is included in the impact study - especially the migratory and nesting seasons. Also please ensure a quality of life study is done regarding civilians and especially refugees who carry war experience in their experience and memory.	Please see response to Comment 6.
171	Laura Tirrell		1-May-18	1) Please unless it is needed for mission preparation, notify Boise city days we can expect practice runs. That way our local veterans who	Thank you for your comment.

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				suffer from PTSD and our refugees will know what's going on. 2) Please consult with the bird observatory and game & fish about when you should minimize missions. Good luck.	
172	Jessamine Jones		2-May-18	I am highly opposed: 1. Noise concern 2. Pollution concern 3. Possibility of crash over urban area 4. Don't want ground troops in town 5. Negative impact on quality of life	Please see response to Comment 6.
173	Nicholas Hadjokas		2-May-18	Simulators would suffice. Stop putting the public-& innocent citizens at risk!	Thank you for your comment.
174	Daminian Lliberuaga		2-May-18	Why can't this programs objectives be achieved using simulators and/or virtual reality?	Section 1.5 describes the purpose of and need for the proposed training.
175	Patrick Kilby		2-May-18	My chief concern with this project are noise levels. Adding noise pollution in an area where relatively little currently exists does not make this a more "livable" city. What are the decibel levels of f 15's at the proposed flying altitudes? How will this improve living in Boise, besides better trained military? I'd like to register my formal opposition to this occurring without better public notice and more public input.	Please see response to Comment 6.
176	Darcy Bellamy		(not filled in)	The military already has this expertise & is far superior to all others. This is unnecessary train(ing). I am against this. This exercise is not critical to national security and should be done on an Air Force Base not a population center. I am aghast - to open (ended) & open to scale up. I am shocked that not one city leader was present at this meeting. It feels like they are trying not to make the public aware.	Thank you for your comment.
177	Margaret Fullerton		2-May-18	A proposal of this magnitude needs to be widely discussed. I am concerned that I was not hearing about this public scoping meeting from many different sources. The Air Force's Public Affairs needs to do more public outreach with a proposal that has the potential to impact public life in Boise - not to mention the other cities - indefinitely. The final decision should be made with as much public commentary as possible. It doesn't seem like the Air Force is doing enough to solicit that commentary. I am also concerned about the impact on daily life in Boise.	Thank you for your comment.
178	Mishel Busch		2-May-18	Boise is strongly against urban combat & we hope you take your war exercises elsewhere. This is unjust to be orchestrating such activities without the consent of the people who live here.	Thank you for your comment.
179	Mishel (no last name given)		2-May-18	No! A huge threat to our city & not necessary.	Thank you for your comment.
180	Juliana Beunar		2-May-18	I am against this for many reasons (.) Mainly it 's affects on the general peace of Boise and the entire Treasure Valley. There must be a better way to practice and prepare for war. Spend some of our \$ on creating a more precise simulation technique or technology.	Thank you for your comment.
181	C Richardo		2-May-18	I appreciate you all coming here & so gracefully handling this meeting. I don't like the idea of planes training overhead - however I very much	Thank you for your comment.

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				appreciate that the pilots are training to become more accurate in their missions. Thank you.	
182	(no name given)		no date given	More everything asked today should be addressed to your commanders & gov officials. I'm happy to have your expertise. Sorry you soldiers have to face the public.	Thank you for your comment.
183	Katie (illegible last name)		no date given	I am a Boise resident & am already suffering from increased military plane over flight disturbance & noise. This endangers my life & property in the event of a plane crash or misuse of technology. It will increase air pollution.	Please see response to Comment 6.
184	Katie Fi (illegible writing)		no date given	Scoping Mtg. #2 This is a dangerous & alarming proposal. It exposes innocent citizens to risk. The noise will harm people's health. The Air Force has vast ranges to train over. This is an unprecedented assault on civilian populations. That must not be allowed to proceed. It violates our civil liberties.	Thank you for your comment.
185	Greg Neu		no date given	People with noise concerns from past CAS training over Boise may have been heavier , non-CAS aircraft, (.) NIMBY on steroids displayed by crowd of pie-in-the-sky progressives/"peace activists", with no clue of USAF training missions. My hope is that this vocal minority will not drown out the silent majority and savvy minds will prevail.	Thank you for your comment.
186	Sherry Gorrell		2-May-18	I appreciate (that) you are having a scoping meeting(.) Most concerned that (the) City of Boise is not here, nor was there any media. I understand that warfare has changed to more urban conflicts, however I am deeply concerned and I do not wish to have Boise support or contribute to the US military industrial complex that basically benefits a few powerful corporations. Therefore besides the disruption of peace in this livable enjoyable city (my hometown). I oppose the plan to have military maneuvers in and over Boise - or any city. I run a guest house here this is renown and loved for its downtown location and peace and tranquility, I know the planned maneuvers could negatively impact my guests experience. *Very concerned of adverse energy impact of the laser that will be fired at the targets which could be a person. Again one major concern is that no one from the City of Boise or the media was here, which tells me this needs to be publicized to our cities more effectively.	Than you for your comment. Laser use and safety will be addressed in the EA.
187	Kristin Hasselblad		2-May-18	I am *against* this project. I do not want the military pretending to bomb us, or direct lasers at our communities, or anything else. The country is over-militarized as it is. Also with Trump in charge, I have extra concern. I *do not want* extra military presence in our community! Thank you for considering my input.	Thank you for your comment.
188	Isaac Hasselblad		2-May-18	I am a citizen of Ada County, Idaho and whole heartedly AGAINST this "training" which use our community as a mock war zone with military personnel walking around in plain clothes. We have an excess of flights already over the area and I do not want to add too it. I do not support additional military presence in our community!	Thank you for your comment.

#	Commenter	Type of Content	Date Received	Comment	Government Response
190	Todd Kurowski		3-May-18	<p>I was at yesterday's meeting at the library. I asked questions about targeting pod (TGP) laser use and whether the F15Es will have training munitions attached.</p> <p>New questions:</p> <ol style="list-style-type: none"> 1. Will you be flying Preplanned and or On Demand CAS missions? 2. CAS by definition implies supporting troops on the ground (Close in). Will your missions be planned around real or simulated ground troop support? 3. CAS missions further have Ground Commanders and controllers near the ground mission site directing strikes, etc. Will these personnel be simulated? (I hope not). 4. At the meeting there was considerable interest in the notion that these missions could become permanent and that the city/residents would have no choice or further say unless the mission parameters change. To potentially alleviate this would it be easy able to have the program expire/pause after say five years for a mandatory re-evaluation if the program is meeting its mission goals and address potential community concerns? 5. At the meeting last night there was significant confusion as to how much actual air traffic Boise would experience. The parameters appear to enable a lot while the implied reality was far less. So, my proposal is that (upon implementation) the city of Boise (through the city web site) receive a monthly after flight report to post for public use. The report would clearly and simply indicate how many actual A/C were flown over the city, collective hours flown over city airspace in the past month. This would create clarity (transparency), would give citizens actual data vs subjective assumptions. Further, having a contact at Boise city hall would give the community a liaison of sorts that could buffer information to and from MHAFB. Additionally, in the unlikely event of a training incident where dummy munitions, chafe/flare or non-training lasers were used, the public could be immediately informed (builds trust, demonstrates commitment to community). <p>Community transparency is so important here. I cannot emphasize this enough.</p> <p>I served for 26 years. I've served five active duty assignments, been assigned to three ANG units and been on six full deployments around the world. It's my experience that OPSEC gets way overblown. Sharing sorties and other post mission info is not likely going to compromise anything. Demonstrating transparency and real community involvement is priceless.</p> <p>I can easily see this project getting derailed by misunderstanding and ignorance (from both the local community AND out of touch military leadership). Let's not let this happen.</p> <p>I would be happy to further assist this project however I can.</p> <p>I look forwards to hearing back from you about my shared</p>	<p>Sections 2.1 through 2.1.6 describe the air and ground operational activities tha would be involved with the proposed Urban CAS aircrew proficiency training. Please also see response to Comment 4.</p>

#	Commenter	Type of Content	Date Received	Comment	Government Response
				considerations and potential solutions.	
191	Robert Hoppie		2-May-18	(The) No action alternative (is the) only acceptable alternative for CAS proposal in Idaho-proposed area. This is the most populated area in Idaho - over 500,000 people in the proposed area. Bad for potential accidents and quality of life in the Treasure Valley. (The) No action alternative (is) only acceptable for this location. 1-183rd Apache unit lost 2 people and acft in Gowen Field (,) 2 and a half years ago - cause = pilot error. This does not have to be conducted over the Treasure Valley.	Thank you for your comment. Airspace management and flight safety will be addressed in the EA.
192	Katie Fite		2-May-18	<p>At the previous MHAFB Boise CAS Urban War Game Scoping meeting, members of the public repeatedly requested to be kept informed. There was a sign up list where people could include their e-mails. Some people have already commented, and the Air Force has their contact info.</p> <p>ALL of these people should be considered Stakeholders.</p> <p>Yet citizens I have spoken to have not received ANY notification from the Air Force about tonight's Boise meeting. I also have not.</p> <p>Was any notice e-mailed to a Stakeholder List?</p> <p>Were letters informing Stakeholders of tonight's meeting mailed?</p> <p>Who does the Air Force consider to be a Stakeholder?</p> <p>If e-mails and letters were not sent out by the Air Force - Why not?</p> <p>Also, please include the following information on air pollution including rising ozone levels in our airspace. Military War Planes release significant amounts of ozone.</p> <p>Urban CAS will worsen this air problem significantly.</p> <p>I also note that there is already a very large amount of annoying and unhealthy Military Overflight activity taking place in Boise. I attended an Airport plan meeting last night. When I asked an Airport Staffer about what was going on with all the increased military flights, I was told some military planes "touch and go" at the airport, and then circle around. THIS annoying circling around sure sounds like some version of Urban CAS, or some other type of dangerous Urban overflight "training". WHO (what part of Military) is conducting this activity? How much of it is taking place? What are its environmental effects - on top of which the incessant War Game disturbance you seek to impose would take place? Note that the Boise airport has more Military transient flights than local Guard flights. WHAT are these transients doing here? I have Attached Photos showing this - based on 2015 older data. WHAT is currently taking place? How much noise and pollution and disturbance to the public it this already generating?</p> <p>Please also include the Attached article documenting some issues raised at the previous Scoping Meeting.</p>	Thank you for your comment.
193	Katie Fite		8-May-18	<p>Dear MHAFB, Here are additional questions that we request that the Air Force respond to in detail in the NEPA document for Urban CAS></p> <p>Also, Please recall that at the recent Boise Scoping meeting, folks in attendance requested a meeting with the Mountain Home Air Force</p>	Mountain Home AFB Public Affairs Office can be contacted at 208-828-6800 for information on the proposed training.

#	Commenter	Type of Content	Date Received	Comment	Government Response
				Base Commander regarding concerns about the Urban CAS proposal. What channels do we go through to follow up on that? Who would the person to contact to arrange that? Thank you very much.	
194	Katie Fite		1-May-18	<p>Questions for the U.S. Air Force Scoping Meeting. 1) What is the public process for determining if this training should happen or not? 2) If approved, when would this training for close air support in urban setting begin? 3) What is the window of time that the Air Force intends to conduct these exercises? (For six months in 2018? Into 2019? 3-5 years out? For the foreseeable future?) 4) How many over-flights per day, per week, per year are planned in each community? 5) Will jets fly M-F and/or on weekends? Daytime only or at night, too? 6) How will sites be selected/scheduled and will each town have the same # of flights? 7) What if Boise proves to be the best site for simulation (due to its size)? Does that mean we will have a disproportionate amount of training exercises conducted here? 8) What other states have had urban setting used for close air support training such as that proposed for Southern Idaho---describe those situations in detail (begun how recently? At what intensity & duration?) 9) What problems arose for the civilian populations* affected and how were these issues solved? 10) Given the known risks to the health and welfare of 500,000 Idahoans living in the proposed mock combat zone, what justifies doing this type of training at all? In other words, why (to date) has the always flown over unpopulated, wildland training ranges? 11) If F-15 aircrews have already conducted successful military operations in deployed/overseas urban situations (while only using unpopulated ranges for training purposes), then what is the reason for the proposed change? 12) Why can't virtual reality activities suffice, as they do for so much related training? 13) Where and when has Urban CAS training taken place over Boise or other civilian areas covered by the nine cities Urban CAS DOPAA? Was the Public informed? How? 14) Are other Branches of the Military/DOD (AF, Marines, Navy, etc.) or Guard currently conducting Urban CAS over Civilian Populations? 15) If so, which ones? Where? How much? What is taking place? Has the public been informed? 16) Where and how will all CAS ground personnel operate? 17) The DOPAA describes driving on paved roads. How far out from City Centers will this use (usually) take place? 18) The DOPAA describes the Urban CAS wheel being 15 NM – and planes will be circulating there for a period of time as well? 19) What wildlife, recreational, park and other uses might this impact? Given the proximity of populated areas – doesn't this mean cities will repeatedly be overflown even when they are not the "target" of CAS? 20) Will there be personnel and/or devices associated with Urban CAS training inside buildings? In parking lots? If so, will these be federal, private or state buildings and/or parking lots? 21) Will local authorities be informed if CAS activities of any kind are occurring in federal, private or state sites? 22) What devices will CAS ground personnel be using? Video, laser, radio communications, phone, Etc.? 23) What are all devices</p>	Sections 2.1 through 2.1.6 describe the air and ground operational activities that would be involved with the proposed Urban CAS aircrew proficiency training. Operations would be conducted in accordance with existing regulations.

#	Commenter	Type of Content	Date Received	Comment	Government Response
				and technologies the war planes will be using? 24) What methods will the Air Force studies look at to determine environmental impacts? 25) Will people's homes, cars, etc. show up on video and images used in the war games? If so, does this violate people's rights to be secure in their own homes – or cars? 26) Will the comments here have any weight? If most folks don't want Boise to be a training range, will the USAF refrain from their proposal? 27) Last meeting it was suggested that ground forces be readily identifies as USAF. Will they be so identified and not wearing civilian clothes and driving POVs? 28) Do we little people in Boise have any recourse if the range is used by aircraft other than F-15s stationed at Mt. Home? 29) Will the USAF conduct an exercise prior to approval so citizens can see and hear the extent of the exercise? 30) Who makes the ultimate approval/authorization for opening the skies over Boise to combat training?	

Scoping Letter Comments Received

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Wednesday, February 21, 2018 11:01 PM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] Request for Link to on-line USAF CAS training over Idaho cities document

Hi,

Can you please e-mail me a Link to EA document on cd that accompanied the Scoping letter for the MHAFB CAS training over Idaho Cities as soon as possible? I have tried Googling, and cannot find it. It does seem to be mentioned in the letter. AND regarding my earlier e-mail, I do now see that you are the person to e-mail comments to.

Thank you very much,

Katie Fite

Public Lands Director

WildLands Defense

PO Box 125

Boise, ID 83701

katie@wildlandsdefense.org <<mailto:katie@wildlandsdefense.org>>

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Wednesday, February 21, 2018 8:05 PM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] DOPAA for USAF Training Over Idaho Urban Areas USAF Memo of Feb. 6, 2018

Dear USAF and Ms. Shaver,

I recently received notification of a shocking proposal from the USAF to train/conduct War Game exercises over nine Idaho Urban areas. Tis proposal is being scoped under a mere EA.

It is critical that an EIS be prepared to analyze all direct, indirect and cumulative effects.

I request that the Air Force notify ALL households in the nine affected Idaho cities. Will you do this?

The Comment Period must be extended so once citizens are informed, they can respond.

This is a matter of significant concern - and endangers the health and lives of the public living in these Urban areas in many ways.

It subjects people to military plane overflights, and the adverse effects of such noise are harmful to human health, harmful to childhood cognitive development, and impacts on human health are cumulative.

"Training" over urban areas can result in disastrous lethal crashes over Urban Areas. These War Planes also contain hazardous substances that further endanger civilian populations in the event of crashes.

During overflights, there are many harmful technological devices that planes may use - or accidentally use, and endanger human and animal health.

This will increase air and noise pollution over Boise and other urban areas.

The USAF already has fake buildings to train over on its remote ranges in Owyhee County. Why isn't this training taking place there?

Why will Boise citizens be subject to War Game activities and overflights from the Singapore Air Force?

What other bases or foreign entity planes will use the "Range"?

What are all the types of planes that will be using the "Range"?

What are the levels harmful infrasound produced by these planes?

Will these planes increasingly land in Boise - adding to the noise and air pollution concerns?

How loud are planes at the elevations listed? Will they drop lower?

What are the infrasound levels of these planes?

A full environmental baseline must be provided.

Is your address the official e-mail address for comments? If not, what is?

How is this related to potential F-35 use of the MHAFB Range, or potential siting of F-35s at Gowen Field?

Please note the USAF letter was sent to a colleague's PO Box, and not to my address.

My address is PO Box 125 Boise, ID 83701.

Thank you,

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738

-----Original Message-----

From: katie fite [mailto:katie@wildlandsdefense.org]

Sent: Friday, February 23, 2018 10:52 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Cc: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>; Peer, Deborah <Deborah.Peer@hdrinc.com>; BITTERS, TRAVIS J GS-09 USAF ACC 366 CES/CEIE <travis.bitters@us.af.mil>

Subject: Re: [Non-DoD Source] Request for Link to on-line USAF CAS training over Idaho cities document

Hi Ms. Noelle,

Thank you for your reply and updating our mailing information address.

I also asked if there is a link to the USAF Stakeholder letter and the NOPAA document for the new military airspace changes and activities posted on the internet? This proposed action appears to be equivalent to creating a new training Range as it entails in the air and on the ground activities. On-line posting is vital so that a broad array of concerned public - such as Idaho citizens across the Nine Cities, whose health may be impacted by the noise and other elements of this proposal, can view the documents. If these documents are indeed posted on-line, what is the link for all the public to be able to fully view the proposal and determine if they want to participate in the USAF process?

To be very specific - I am referring to the USAF letter/memo dated Feb. 6, 2016, Subject: Description of the Proposed Action and Alternatives for an Environmental Assessment Addressing the Establishment of Urban Close Air support (CAS) Air and Ground Training Spaces near the Mountain Home Air Force Base, Idaho and to the similarly titled longer document on an accompanying cd. This letter/Memo and document are clearly Scoping documents under NEPA.

If this information is not yet posted, I again request that the information in the letter/memo and NOPAA document you sent to Stakeholders be posted on-line. Will the Air Force do this - and do it well within the comment period which is already over two weeks underway? If it is not possible to post this on-line in a timely manner, then the comment period should be extended.

I also again request that the Air Force mail notification of the proposed new Nine Cities Urban Military Airspace/Range CAS proposal action to all households under the proposed action. These households and citizens living in them must be considered as Stakeholders. They will be overflown by noisy military planes, which may impact their health and the health of their children and pets/animals. Noise or other elements of the Range may also impact their property values. These citizens are also the population that may be endangered by military plane crashes related to the proposed Range, technology malfunctions, or other aspects of the aerial and ground activities of the Range.

It is very important that there is upfront public knowledge and information about this very wide-ranging Nine Cities urban warfare activity proposal. Often, once the Air Force obtains a new airspace/Range, the type of plane flying in or over it, or the activities conducted on the ground, change significantly many times in the future. Planes from other bases or other countries may use it. This is certainly the history of USAF Ranges in Idaho that I have been following for decades now. Subsequent documents making important changes may include limited new analysis, and simply tier/point back to the original document and process authorizing the initial airspace/ Range. Once the USAF obtains airspace or Ranges - many potential hazardous activities, even noisily loud planes like the F-35, may later be proposed to be used on them.

Thank you,

Katie Fite
WildLands Defense
PO Box 125
Boise, ID 83701

-----Original Message-----

From: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE [mailto:noelle.shaver@us.af.mil]

Sent: Friday, February 23, 2018 11:14 AM

To: katie fite <katie@wildlandsdefense.org>

Cc: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>; Peer, Deborah <Deborah.Peer@hdrinc.com>; BITTERS, TRAVIS J GS-09 USAF ACC 366 CES/CEIE <travis.bitters@us.af.mil>

Subject: RE: [Non-DoD Source] Request for Link to on-line USAF CAS training over Idaho cities document

Good morning Ms. Fite,

Thank you for your comments regarding the proposed URBAN CAS training. Your contact information has been updated accordingly. To clarify, an environmental study has not yet been conducted for this action. The provided Description of Proposed Action and Alternatives (DOPPA) is used to notify stakeholders of the proposed action and the anticipated process for moving forward with analyses in accordance with the National Environmental Policy Act. We will continue to provide notifications as the process moves forward.

Sincerely,
Noelle Shaver

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, February 21, 2018 10:54 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Cc: Inna S. [REDACTED]
Subject: [Non-DoD Source] RE: Urban CAS EA over Boise

Ms. Noelle Shaver,

I thank MH AFB for explaining the military's need for using my city in Urban CAS Training using 2 to 4 F-15E's at a time.

I wish to explain why I do not need two to four F-15E over my head.

From the elevation of 10,000 ft, max loudness of F-15 is 75 dBA. The equivalent of a functioning vacuum cleaner.
Two to four F-15's will therefore produce 2 to 4 times the noise, i.e. the equivalent of 85 to 95 dBA. The equivalent of a power mower.
OSHA requires wearing hearing protection for people routinely exposed to this level of noise.
Therefore your proposal endangers public health.

I object to your Urban CAS war games over Boise, as I am sure a lot of other people will do.

With best regards,
Inna Patrick
[REDACTED]

-----Original Message-----

From: Timothy Pauls [REDACTED]
Sent: Thursday, February 22, 2018 5:00 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Close Air Support Drills in Boise

Ms. Shaver,

My neighborhood email group and other various folks have identified you as the contact for any reactions to proposed close air support drill over Boise, Idaho. (Lucky you!) I was particularly amused by the reader who expressed concern that radar jammers might activate our garage door openers.

Here's my reaction: I'm all for it. Thumbs up. Bring 'em on. It's the least we can do. If the worst case doomsday scenario does take place and my garage door goes up on its own, well ... I can always put it back down again.

My thanks to all in the Air Force for their service.

Cheers,

Tim Pauls
Boise, Idaho

-----Original Message-----

From: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE [mailto:noelle.shaver@us.af.mil]
Sent: Friday, February 23, 2018 10:13 AM
To: Timothy Pauls <timothypauls@gmail.com>
Cc: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>; Peer, Deborah <Deborah.Peer@hdrinc.com>; BITTERS, TRAVIS J GS-09 USAF ACC 366 CES/CEIE <travis.bitters@us.af.mil>
Subject: RE: [Non-DoD Source] Close Air Support Drills in Boise

Mr. Pauls,

Thank you for your comments and support. MHAFB has not received comments regarding radar jamming but would encourage those in the community and your neighborhood email group to submit comments/concerns so they can be accurately addressed.

We look forward to your participation in the continuing environmental assessment process.

Sincerely,
Noelle Shaver

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Monday, February 26, 2018 10:36 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] Nine cities Urban Area Range DOPAA Literature question

Dear Ms. Shaver,

I see there is a document in the DOPAA entitled:

AFCEC: U.S. Air Force Civil Engineering Center (AFCEC). 2017. AFCEC Noise Program, Noise Model Operational Data Documentation (NMODD) Deliverable for the Mountain Home Air Force Base 2018 Air Installation Compatible Use Zone (AICUZ) Study. Prepared for Mountain Home AFB by Leidos. July 2017.

Can you please provide me with this report as soon as possible?

Also, are the nine urban areas considered AICUZ sites, i.e. "compatible" use zones?

Katie Fite

WildLands Defense

PO Box 125

Boise, ID 83701

208-871-5738

-----Original Message-----

From: J N [REDACTED]

Sent: Monday, February 26, 2018 10:00 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] Support the proposed urban training op

Good morning,

I just want to email and put in my \$0.02 about the proposed urban training op that you are undoubtedly receiving some angry emails about. There is a very small, very vocal group of naysayers in Boise who have nothing better to do than solicit others to oppose anything having to do with Fighter Jets, Gowen Field or military ops in general. They rely on misinformation, outright lies and propaganda/hyperbole to spread their venom.

The vast majority of Boise and the Treasure Valley supports this training op.

On a sidenote, if there's anything you'd need as far as civilian actors, I would offer my time. I'm a 5-yr. USMC vet, and was an Iraqi and Arabic cryptologic linguist. I am willing to donate my time if there is any role you might have.

Sincerely,

Justin Nyquist

Boise, Idaho

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Wednesday, February 28, 2018 3:34 PM

To: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>; SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Cc: katie fite <katiemesa@gmail.com>

Subject: [Non-DoD Source] Comment Period for CAS Nine Cities Urban War Games Proposal

Hello,

I just received an e-mail from Ms. Robertson about public meetings for the CAS Nine Cities War Game proposal. Does this mean the DOPAA comment period is extended?

I also have a request in to Ms. Shaver for a document cited in the Lit section of the DOPAA.

It is:

Will this be provided in a timely manner so it is useful to use for commenting on this proposal?

Os there a link to the proposal yet? I began making inquiries about that last week, and have gotten no response.

Thank you,

Katie Fite
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Thursday, March 1, 2018 9:04 AM

To: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>; SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Cc: katie fite <katiemesa@gmail.com>

Subject: [Non-DoD Source] Re: Comment Period for CAS Nine Cities Urban War Game Range Proposal

Hi,

We appreciate that the Air Force is now holding Scoping Meetings for the Urban Warfare Range proposal.

The dates of the meetings (starting March 5) are too close to when the Air Force decided to try to notify the public. Many folks have PO Boxes, and don't check them every few days. Or have to make plans in advance to be able to attend meetings during the week.

And who is the Air Force notifying? The Air Force should notify all residents under the Nine Cities War Game proposal - as this will impact the quality of life, potentially health, home values, and potentially safety of ALL of this population.

Why won't the Air Force do this properly, i.e. Re-scope the project, and commence a new Scoping and comment period with public meetings announced well in advance?

It is also our belief that an EIS is required for this new Urban Warfare Range - as the scale over a civilian population is unprecedented, and uses are very likely to change - including impost of the noisiously loud F-35 or other planes. This would require publication of a Notice in the Federal Register.

It seems this project is being fast-tracked through. I am very concerned the AF is seeking to finalize it prior to the completion of the F-35 EIS. This monstrous Urban Range could then be used as an "asset" in the F-35 EIS process to weigh the outcome in favor of basing F-35s in Boise. As you are aware, various bases are "competing" with one another. Getting a massive Range expansion would aid in that competition.

I would also like to make sure that the Air Force makes clear to the public (including in Scoping meetings) that the F-15s are planned to be replaced, and according to information displayed at the Boise F-35 Scoping meeting, the F-35 is very likely to be the replacement plane.

Please see Attached photo from the Boise F-35 Scoping meeting re: the "aging" F-15 being replaced by the F-35.

It was also very odd that the various Guard personnel and info officers at the F-35 Scoping meeting in Boise claimed to know nothing about this proposal. Certainly the Guard leadership must know about this. It is a concern that it was not included as a potentially linked or connected action at the F-35 meeting.

Sincerely,

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738

-----Original Message-----

From: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE

Sent: Thursday, March 1, 2018 3:20 PM

To: 'katie fite' <katie@wildlandsdefense.org>

Cc: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: RE: [Non-DoD Source] Comment Period for Urban CAS Proposal

Ms. Fite

The stakeholder comment period, regarding the proposed Urban Close Air Support Training DOPAA, is extended to March 26th. This will allow the Air Force to take into account any additional comments received during the scoping meetings. Although not required, the Air Force has decided to make the DOPAA available on the Mountain Home AFB website, under Environmental Documents.

The DOPAA is available at [http://www.mountainhome.af.mil/Portals/102/Documents/environmental/Urban%20CAS Final%20DOPAA.PDF?ver=2018-03-01-164918-127](http://www.mountainhome.af.mil/Portals/102/Documents/environmental/Urban%20CAS%20DOPAA.PDF?ver=2018-03-01-164918-127)

The Air Installation Compatible Use Zone (AICUZ) study cited in the DOPAA is not complete at this time. The noise model within the AICUZ was developed for Mountain Home AFB only. Noise modeling/analysis will be conducted within the upcoming Environmental Assessment for the proposed Urban CAS Training.

Respectfully,

Sheri Robertson

Chief, Environmental

366 CES/CEIE

1030 Liberator Street

Mountain Home AFB ID 83648

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Thursday, March 1, 2018 3:38 PM

To: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>

Cc: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: Re: [Non-DoD Source] Comment Period for Urban CAS Proposal

Thank you very much for this information, and for Posting the DOPAA document on-line.

Will you provide the document when it is complete. Why is it cited the DOPAA if it is not complete?

KatieFite

WildLands Defense

PO Box 125

Boise, ID 83702



IDAHO
CONSERVATION
LEAGUE

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Noelle Shaver
366 CES/CEIE
1030 Liberator St.
Mountain Home AFB
ID, 83648

noelle.shaver@us.af.mil

March 5, 2018

Re: Proposed Action and Alternatives for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho

Dear Ms. Shaver,

Thank you for considering our comments on the Proposed Action and Alternatives for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters who have a deep personal interest in ensuring that military training projects are designed to avoid, minimize or mitigate impacts on public health, quality of life, and wildlife.

The description of the proposed action and alternatives are part of an Environmental Assessment (EA) which will disclose the environmental effects of Urban Close Air Support air and ground training spaces near Mountain Home Air Force Base. The document describes a series of training measures in large, medium and small urban centers in southwest Idaho. However, this document does not go into detail into the actual environmental effects of the proposed action.

The full Environmental Assessment must disclose these effects to the public. In addition, the Air Force may need to develop additional alternatives to address concerns and issues raised by the public.

Idaho Conservation League comments regarding the Proposed Action and Alternatives for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, Page 1 of 2

We recommend that the Air Force ensure that public safety is fully protected during military training exercises. We note that members of the public may become concerned about unidentified ground support team members and mistake training activities as a real security threat, exposing members of the public and ground support personnel to harm. Please describe how such scenarios will be handled and what types of coordination will occur with municipalities and local and state law enforcement agencies.

The Environmental Assessment should also assess potential negative effects of aircraft noise on members of the public living and working in the training area as well as on wildlife. The timing, duration and intensity of these activities should also be factored into the analysis and the determination of significance. We recommend that the Air Force develop additional alternatives and design features to address these concerns.

Once again we thank you for the opportunity to submit comments on this project. Please send us any subsequent documents for this project.

Sincerely,

A handwritten signature in black ink, reading "John Robison". The signature is fluid and cursive, with a horizontal line extending from the end of the name.

John Robison
Public Lands Director
Idaho Conservation League
(208) 559-0283
jrobison@idahoconservation.org

-----Original Message-----

From: Chad Thompson [REDACTED]

Sent: Tuesday, March 6, 2018 9:10 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] NO to F15/F## over cities; Proposed Action and Alternatives for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho

First, I'm very pro-military. Most of my family has served.

The military exists to protect us. We need a strong and nimble military. The most expensive military is the second best one.

That being said, when the military instead harms us then that needs corrected.

The higher the density a population becomes, the more restrictions there are on pollution because of the higher impact. One of the worst today is noise pollution. There are a myriad of laws published to address that, from "loud mufflers" citations to arrests for assault.

When F15s/F16s were flying low over Boise this summer prepping for the air show, one went low overhead my house when I was outside. I suffered a headache and ringing ears the rest of the day. If a person had done that they would have been arrested and jailed.

The military gets a lot of leeway from me, but not when what they are doing is equivalent to assaulting hundreds of thousands of Americans in the Boise valley.

Furthermore, it's a very bad move long term for the military because it's going to build up ongoing resentment and anti-military voting.

There are half a million acres south of this area and far more south and east of that. Flying over cities creates far more harm than benefit.

Furthermore, as a family of Army veterans, we've seen F## dropping bombs on our own troops and friendlies far too often. F## work for quick response when everything goes perfectly - which rarely happens. Even the Russian's latest engagement policies are to first scramble C&C capability and coordination - which F## are completely reliant on. The AF either needs to be efficient and effective at "slow and quiet" CAS or get out entirely. A10, the 3 possible replacements/assistants for A10s, drones, etc. F## planes aren't it.

Chad Thompson

83709

-----Original Message-----

From: Hood, Lynne [<mailto:Hood.Lynne@epa.gov>]

Sent: Wednesday, March 7, 2018 4:44 PM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] EPA scoping input on Establishment of Urban Close Air Support

Hello,

Thank you for the letter (received February 8, 2018) soliciting comments on the proposed Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho.

We look forward to reviewing the Environmental Assessment (EA) once it released to the public.

Please consider the following suggestions and recommendations during the development of the EA.

* Noise Pollution

While noise induced hearing loss is the most common health effect associated with noise pollution, we note that exposure to constant or high levels of noise can cause other adverse health effects, including stress related illnesses, high blood pressure, speech interference, sleep disruption, and lost productivity. Therefore, due to the noise levels generated by F-35 aircraft, we recommend a comprehensive analysis of potential impacts associated with the proposed activities in each location. We further recommend that special consideration be given to sensitive receptors as well as environmental justice communities in each location. Additionally, we recommend that the potential impacts from high levels of noise and appropriate mitigation to offset those impacts, in consultation with potentially affected stakeholders, be evaluated in the EIS. We also recommend discussion and analysis of compliance with any local or regional noise ordinances in the EIS.

* Environmental Justice and Public Participation

We recommend that the EA should include an evaluation of environmental justice populations within the geographic scope of the project. If such populations exist, the EA will need to address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations. We recommend that the assessment of the project's impact on minority and low-income populations should reflect coordination with those affected populations. One tool available to locate Environmental Justice populations is the Environmental Justice Geographic Assessment tool.

* Cumulative Impacts

We recommend that the EA consider the cumulative effects of this and other actions' impacts on human health and the environment. We acknowledge that concurrent to this analysis, the Department of Defense, Air National Guard released a Notice of Intent to prepare an Environmental Impact Statement to analyze the effects of F-35 Operational Beddown at airfields including Gowen Field in Boise, ID. The proposed Mountain Home CAS would also occur in Boise, Idaho - and we note that it could potentially create cumulative project impacts and pressure on local communities and wildlife. We recommend that this action, as well as any other upcoming actions, be evaluated in an EA cumulative effects analysis. In the event that you haven't seen the National Guard Project information, below is a link to the DOD's Federal Register Notice of Intent. <https://www.federalregister.gov/documents/2018/02/07/2018-02468/notice-of-intent-to-prepare-an-environmental-impact-statement-for-f-35-operational-beddown-air> <<https://www.federalregister.gov/documents/2018/02/07/2018-02468/notice-of-intent-to-prepare-an-environmental-impact-statement-for-f-35-operational-beddown-air>>

Please feel free to contact me with any questions that you may have regarding the EPA's recommendations.

Thank you,

Lynne

Lynne Ann Hood

Environmental Scientist, NEPA Review

EPA R10- Idaho Operations Office

950 W Bannock Street, Suite 900

Boise, Idaho 83702

Phone: 208-378-5757

-----Original Message-----

From: Anne Hausrath [mailto:ahausrath@gmail.com]
Sent: Sunday, March 11, 2018 7:13 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] urban CAS scoping hearing?

Please let me know when and where scoping hearings will be held in Boise on

urban CA ground and airspace training areas

thank you, Anne Hausrath

--

Anne Stites Hausrath
ahausrath@gmail.com <<mailto:ahausrath@gmail.com>>
208-345-9631

-----Original Message-----

From: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE [mailto:sheri.robertson@us.af.mil]
Sent: Monday, March 12, 2018 12:12 PM
To: ahausrath@gmail.com
Cc: [REDACTED] <Peer@hdrinc.com>; SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: RE: [Non-DoD Source] urban CAS scoping hearing?

Ma'am,

The Mountain Home AFB Urban CAS Public Scoping Meetings for Boise, Meridian, and Eagle have been postponed until further notice. However, the one scheduled in the City of Mountain Home tomorrow evening (5:00 - 7:00 pm at the American Legion VFW Hall 515 E 2nd S Street, Mountain Home) will continue as scheduled. You are encouraged to attend.

Please feel free to contact with any questions or concerns. You can also contact the MHAFB Public Affairs Office at 208-828-6800.

Respectfully,

Sheri Robertson
Chief, Environmental
366 CES/CEIE
1030 Liberator Street

-----Original Message-----

From: katie fite [mailto:katie@wildlandsdefense.org]
Sent: Monday, March 12, 2018 11:51 AM
To: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>; SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Re: UPDATE: Proposed URBAN CAS Training Environmental Assessment Public Scoping Meetings_Boise, Meridian, Eagle postponed

Hello,

Why is the Boise Public Meeting cancelled on the day of the meeting?

How will this affect the comment period deadline?

Why is Mountain Home's meeting still happening?

Concerned Boise members of the public had reached out to neighbors and concerned citizens to attend. Concerned organizations had put out Notices of the meeting to their members.

I had recently posted a Message on Next-door about the meeting that reached several thousands of homes.

How much public notice will the public receive before any public meeting in Boise takes place? There needs to be at least three weeks notice. EVERY household under the Air Space needs to be reconsidered a "Stakeholder", and mailed a notification of the proposal and of any meeting to be held in a timely manner.

What the Air Force really needs to do, if it continues to pursue this unprecedented air and land Warfare Range on top of a civilian population is to prepare an EIS, and abandon this current effort to ram this dangerous proposal through with an EA.

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701



March 14, 2018

RE: USAF Urban War Range CAS DOPAA, Singapore DEA, Convoy EA

Dear Ms. Shaver and Ms. Robertson,

I have transferred concerns from an e-mail I sent to you into a Word Document, after realizing images in my e-mail may not properly display on non-MAC computers.

Here are serious concerns and comments from WildLands Defense following my recent reading of the MHAFB Dec. 2017 Draft Singapore Beddown EA and the Draft and Final Convoy Training EAs (referenced as Environmental Assessment for Operational Changes and Range Improvements in the Mountain Home Range Complex), including as these concerns relate to the Urban War Range CAS DOPAA.

Singapore 2017 Draft EA and Nine Cities CAS DOPAA Urban War Game Proposal

In searching for a document referenced in the Nine Cities Urban War Game DOPAA, I discovered that the Air Force had prepared a Draft EA for the Beddown of more Singapore F-15s at Mountain Home Air Force Base.

http://www.mountainhome.af.mil/Portals/102/Documents/environmental/20171220_MHAFB%20RSAF%20Beddown%20Public%20Draft%20EA.pdf?ver=2017-12-21-100103-127

I also noticed that the percentage increase of MHAFB remote Owyhee Range use found in the Draft Singapore beddown EA is 14%. This is close to the total amount MHAFB of Urban CAS training that would be shifted on top of a million Idaho civilians. The War Game DOPAA states 9.5% of current MHAFB use would be shifted onto the cities and people.

Draft EA for RSAF F-15SG Beddown, Mountain Home AFB
DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

1 Table 2-3. Current and Proposed Annual Airfield Sorties and Operations

Aircraft	Departures ^a	Arrivals ^b	Closed Patterns	Total
F-15E (389 FS/391 FS)	6,577	6,577	22,688	35,842
F-15SG (RSAF 428 FS)	2,782	2,782	15,459	21,023
Transient	1,847	1,847	0	3,694
Total Baseline Operations ^a	11,206	11,206	38,147	60,559
Proposed Action Increase F-15SG (RSAF 428 FS)	1,520	1,520	6,625	9,665
Total Baseline and Proposed Action	12,726	12,726	44,772	70,224
Percent Change	12%	12%	15%	14%

^a Source: USAF 2017
^b The number of sorties is equal to the number of arrivals or the number of departures.

2 2.1.3.2 TRAINING FLIGHT OPERATIONS

3 Aircraft from Mountain Home AFB currently conduct training operations in MOAs and overlying

4 Air Traffic Control Assigned Airspaces, restricted areas, and Military Training Routes (MTRs).

5 No aspect of the Proposed Action would alter the structure or overall nature or use of the local

6 or remote airspace units. Rather, changes to the aircraft inventory at Mountain Home AFB

7 would only result in minor modifications to the amount of activity in the airspace.

8 Mountain Home AFB uses five MOAs within the region: Jarbridge, Owyhee, Paradise East,

9 Paradise West, and Saddle (see Figure 2-1). While F-15Es and F-15SGs have dual air-to-air

10 and air-to-ground roles as reflected in their flight profiles, the air-to-ground function is primary.

11 Primary air-to-ground training occurs in the Jarbridge MOA, whereas use of the other MOAs

Singapore Draft EA shows Beddown resulting in 14% increase in MHAFB remote range use.

Final DOPAA for Urban CAS Air and Ground Training Spaces, Mountain Home AFB
PURPOSE OF AND NEED FOR THE PROPOSED ACTION

conducted within a 24-hour period. A training operation involves the roundtrip (i.e., departure and return) flights of multiple F-15E aircraft from the installation to meet a defined training objective. The roundtrip flight of each aircraft involved is one sortie. Each sortie is comprised of two flight operations: the departure flight of an aircraft from the installation to the training area, and the return flight of that aircraft to the installation from the training area.

The baseline total for flight operations at Mountain Home AFB is approximated at 70,704 operations per year and includes all Mountain Home AFB and transient aircraft operations (AFCEC 2017). Approximately 260 training events involving approximately 6,760 flight operations are conducted annually for Urban CAS training. Thus, the annual total of Urban CAS operations represents approximately 9.5 percent of the installation's annual baseline for flight operations.

The existing proficiency training in Urban CAS on the installation involves the flying of unarmed F-15E aircraft within an altitude of 10,000 to 18,000 feet (ft) above ground level within a 30-nautical mile (NM) operating area and support from JTACs from the ground area directly underlying the operational airspace. Ground support personnel are dressed and behave in a manner that is consistent with the civilian community to avoid drawing attention to the operations. To facilitate aircrew tracking of identified targets, lead JTACs may be positioned in or on buildings in areas that provide broad lines of sight. Remaining ground support personnel may be positioned anywhere on the installation such as in vehicles driving along streets or parked along the side of a road, walking along sidewalks, or walking into or out of buildings.

2018 DOPAA shows 9.5% of MHAFB Urban CAS Use will be shifted to Civilian

populations.

I am very concerned that the new Singapore beddown is connected to the unprecedented SHIFT of military war games onto a new Urban War Range that the Nine Cities CAS DOPAA proposal would carve out. The War Range proposal would take place on top of this major civilian population. Is the shift to a civilian population making room for increased Singapore training?

WHO was mailed a copy of this Singapore beddown proposal? Please provide the mailing list.

This Air Force appears to be illegally segmenting NEPA processes.

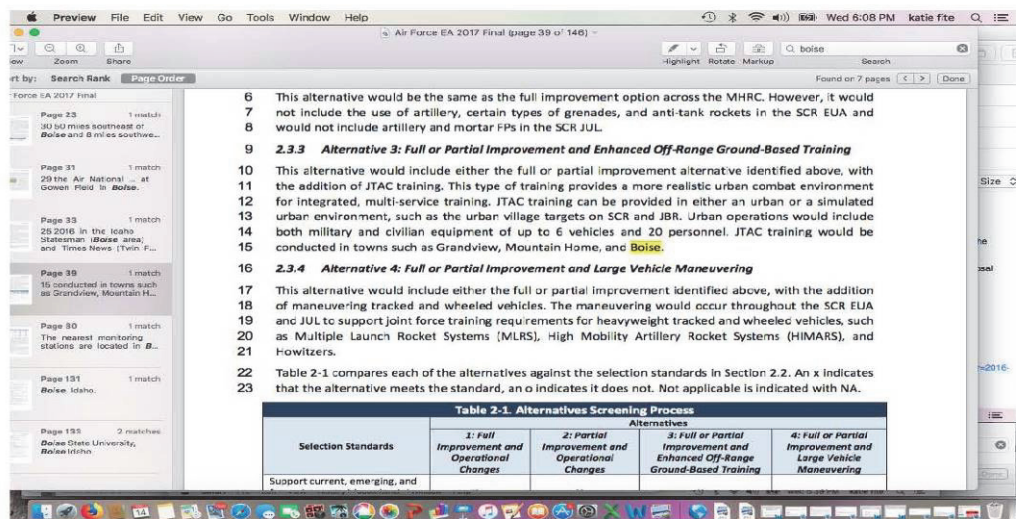
PLEASE consider this e-mail to be a comment on the Singapore Draft EA. WHO is the contact person and project lead in charge of it? There is no info on public comment in the Singapore DEA that I could find.

AF 2016-2017 Convoy Training EA and State Highway Militarization Reference to Boise Training

I have also discovered that the Air Force makes a single vague reference to Boise city training in its DRAFT 2016 Convoy Training EA, in an Alternative that was not considered or chosen in the Final EA. It also was not analyzed, as there was no analysis of Boise Urban war training. See:

<http://www.mountainhome.af.mil/Portals/102/Documents/MHRC%20Draft%20EA.pdf?ver=2016-05-31-170819-700> Draft EA

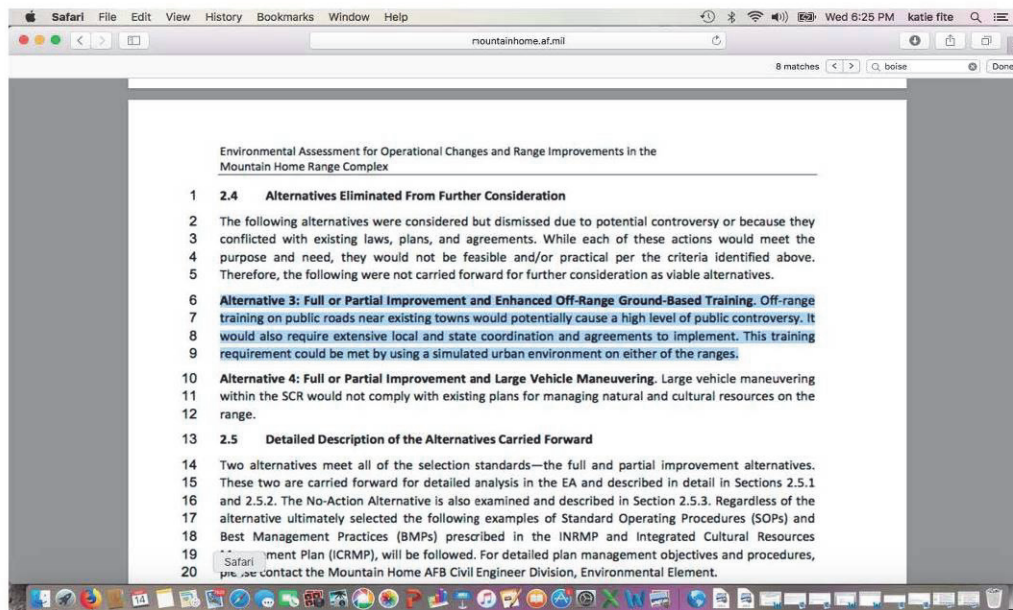
http://www.mountainhome.af.mil/Portals/102/Documents/Final%20Draft%20Operational%20EA_Optimized.pdf?ver=2016-11-07-180326-163 Final EA



Alternative 3.

THEN the Final Convoy EA REJECTS this Boise use, and admits it would cause a HIGH DEGREE OF CONTROVERSY! It states:

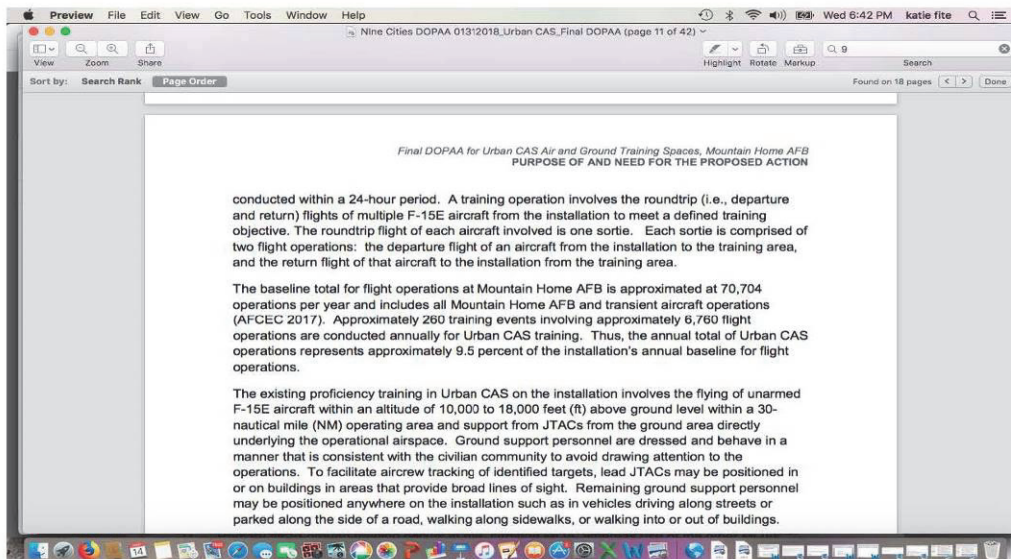
Alternative 3: Full or Partial Improvement and Enhanced Off-Range Ground-Based Training. Off-range training on public roads near existing towns would potentially *cause a high level of public controversy*. It would also require extensive local and state coordination and agreements to implement. This training requirement could be met by using a simulated urban environment on either of the ranges.



This shows the Final Convoy EA Rejection of imposing War Games on Urban populations. It states such use is highly CONTROVERSIAL. This demonstrates the need for an EIS to be conducted for War Game training over a civilian population.

This passing mention of a rejected alternative action and the extremely limited document analysis in all matters related to such training is not a valid assessment of the Urban War DOPAA proposals' massive intrusion into a civilian population AF activity impacts - let alone imposition of a massive War Game battlefield over top the civilian population.

In no way, shape or form did the Convoy EA analyze the direct, indirect and cumulative adverse impacts of Urban War Game training over civilian populations, and other elements of the DOPAA proposal. Yet the Urban War Game DOPAA claims that it does! That is FALSE. WHY is the Air Force preparing documents with false statements for the American people? SEE last paragraph below.



The last paragraph here from the 2018 DOPAA claims pretty much all the impacts of the activity have already been analyzed! This is FALSE.

This single reference to Boise in a rejected alternative reveals the Air Force in 2016 had fore-knowledge/plans of some kind for the unprecedented Urban CAS War Game DOPAA actions. This demonstrates MORE unlawful NEPA segmentation by the Air Force.

The Air Force in the Urban War Game DOPAA is trying to unlawfully ram through in a piecemeal and highly segmented manner a series of connected actions. These actions would impose a major new War Range with an unprecedented civilian footprint, impose a further beddown of foreign military war planes, and who knows what else that we have not yet unearthed.

The Air Force must lay out its full plans (as well as those of the Idaho Air and Ground-based National Guard) for the militarization of southern Idaho and surrounding lands and airspace. These plans must be openly presented to the public.

Are there OTHER Air Force (or potentially Guard) EAs or CXs currently open for public comment? If so, what are they? What else has been released to a tiny hand full of people over the years?

Please let me know you have received this e-mail, and placed these comments and concerns in the project record for the both the Singapore EA and the CAS Urban War game EA.

Please place these comments in the project record for any other MHAFFB and USAF related EAs, CXS or NEPA processes that relate to these projects in any way.

Sincerely,
/kf

A handwritten signature in cursive script that reads "Katie Fite".

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise ID 83701
208-871-5738



WILDLANDS DEFENSE

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March 15, 2018

Ms. Noelle Shaver
366 Liberator St.
Mountain Home AFB
83648

Dear US Air Force, Ms. Noelle Shaver and Ms. Sheri Robertson,

Here are comments of WildLands Defense on the Air Force's Scoping letter and DOPAA for: *Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, Responsible Agencies: U.S. Air Force (USAF); Air Combat Command; 366th Fighter Wing. Affected Location: Urban centers located near Mountain Home Air Force Base, Idaho.*

This proposal is a shocking and unprecedented effort to impose hazardous and disturbing military War Game activity over top and in the midst of a civilian population of nearly a million Idaho residents.

The Air Force intends to shift current Urban War training currently taking place at Military Withdrawn lands and in military Airspace at Saylor Creek and Juniper Butte Bombing Ranges and associated remote Range areas onto a huge civilian population.

The Air Force seeks a permanent, immense new Urban Warfare Range over Idaho's densest population. As the DOPAA states:

"Once these air and ground spaces are identified and use is coordinated", the USAF will shift the existing Urban CAS training operations from Military Withdrawn lands to the nine urban centers.

It appears that the existing Urban CAS training has been taking place just fine in and over the existing Military sites. See MHAFFB 2016 Convoy Training EA Excerpts (Attached to these comments) describing Urban CAS training and fake towns at Saylor Creek and Juniper Butte and many brand new Urban CAS facilities. Is this proposal, which assaults the health, well-being and property of a million Idaho civilians, an effort to clear out use at Saylor Creek and elsewhere, to make room for more Singapore or other foreign military training? Or to potentially make room for the F-35 War Planes the Idaho National Guard seeks to bed down at Gowen and the Boise Airport, and their foreseeable use of the remote Owyhee ranges like Saylor Creek or JBR? It certainly appears that expanded and full bore Urban CAS training will continue at Saylor Creek – as the 2016 Convoy EA approved building 6 new Urban CAS sites, and altering another – likely costing the public millions of dollars. The Air Force must reveal whether Urban CAS War training will continue to take place at the military withdrawn lands and remote Range sites. It would make no sense to build all those new Urban War facilities and then

wildlandsdefense.org

WildLands Defense is a 501(c)3 nonprofit corporation dedicated to protecting and improving the ecological and aesthetic qualities of wildlands and wildlife communities in the Western United States

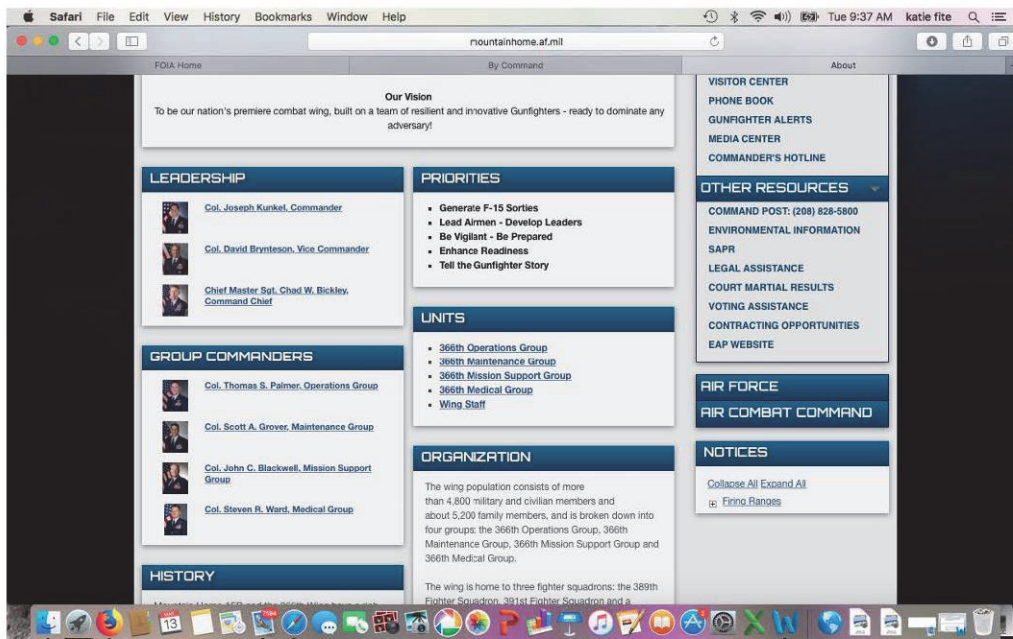
abandon them. This raises public concern that the Nine Cities War Game proposal is related to carving out air and ground space for the Guard or others to use in the future – including F-35s.

Material displayed at the Boise F-35 scoping meeting that just took place shows that the military plans to replace F-15s with F-35s. So once the AF carves out its new Urban War Range, it is extremely likely F-35s will “train” in it - if the Guard gets the F-35 War Planes it seeks. NOTE: The Guard and politician efforts to acquire F-35s are highly controversial – with Boise residents alarmed at the loss of their homes, plummeting home values, gutting of neighborhoods, health effects, and loss of quality of life associated with noisily loud military War Planes, and representing a further invasion of military activity into their lives.

Now occurring at the same time as the F-35 EIS Scoping process, MHAFB has released this very significant and highly controversial CAS Urban War Game scoping DOPAA. The DOPAA actions show that potentially hazardous Military Training, accidents, and incessant noise and other disturbance will be shifted from the existing MHAFB Military Training Ranges to what is in effect a new Training Range representing a radical expansion of the military footprint in Idaho and the region. This new Range would span a huge civilian population including Idaho’s largest city, and other public lands and various protected public land areas.

Where did the DOPAA proposal originate from? What large plan or plans is it linked to? Did it come from MHAFB, the Air Force Secretary, or Department of Defense? We note that Sec of Defense James Mattis visited Mountain Home in January, and this proposal was then mailed out to a few “Stakeholders” in February. Please also see Attached WLD letter documenting the USAF contemplating and rejecting without any analysis Boise (and Grandview and Mountain Home) Urban CAS training in an earlier Convoy Training EA that militarized state Highway 51.

We are dismayed that citizens and the public lands and wildlife underlying and within this radical range expansion may be subjected to Urban War Games in order to “generate” more MHAFB F-15 sorties. See MHAFB image below. Military bases are always competing with one another to get more facilities or activities – in order to get more federal dollars.



MAHAFB web page showing “Priority” to generate more sorties.

Air Force Intends to Replace F-15 with F-35 – So F-15 Planes and Activity Are Likely to Morph/Change if Air Force Gets New Urban War Range

The materials at the IDANG F-35 Scoping meeting in Boise showed that the Air Force intends to scrap F-15s and replace them with F-35s. The display states “**the F-35 is proposed to replace the aging F-15, F-16 and A-10**”. This has also been reported in Aviation Week and other news articles. It has also been reported that pilots are to be replaced by automation.

Thus, it is very likely and highly foreseeable that once the Air Force carves out an airspace and ground space for its new Urban War Range, the F-15s will be replaced by F-35s, and likely other military planes and devices as well. It is also highly likely the on the ground disguised military personnel activity and devices they use will change.

It is also very likely that Singapore and other foreign military aircraft (and potentially ground personnel???) will use the Urban War Range (with future NEPA tweaking by the Air Force – raising the spectre of foreign militaries using the bulk of Idaho’s population for “training” or using devices that may stream video, provide extremely detailed mapping, or otherwise collect data on Idaho citizens.

This current NEPA analysis must take a full candid hard look at all these highly foreseeable and linked activities and changes. This also illustrates why it is essential for the Air Force to prepare an EIS.

Recent reporting highlights the military incrementally putting in place much larger or different activities than the public was informed of in an initial proposal. See <http://www.truth-out.org/news/item/43596-the-pentagon-is-using-an-environmental-law-meant-to-protect-us-against-us>

"Using the NEPA process, the US military is required to evaluate the environmental and related social and economic effects of their proposed actions. The military is also required by NEPA to provide opportunities for public review and comment on those evaluations.

But critics say the military has stacked the deck in its own favor in order to get what it wants, oftentimes even doing so illegally.

Karen Sullivan, a retired endangered species biologist, cofounded the West Coast Action Alliance, which acts as a watchdog of naval activities in the Pacific Northwest.

Sullivan has compiled a document that she believes to be akin to a DOD "NEPA Playbook," which she shared with Truthout.

The pattern Sullivan sees the DOD use to insure its operations or trainings are never held up or denied by NEPA begins with the military always finding, in its environmental assessments, that its activities will have "no significant impact" on the environment or civilians".

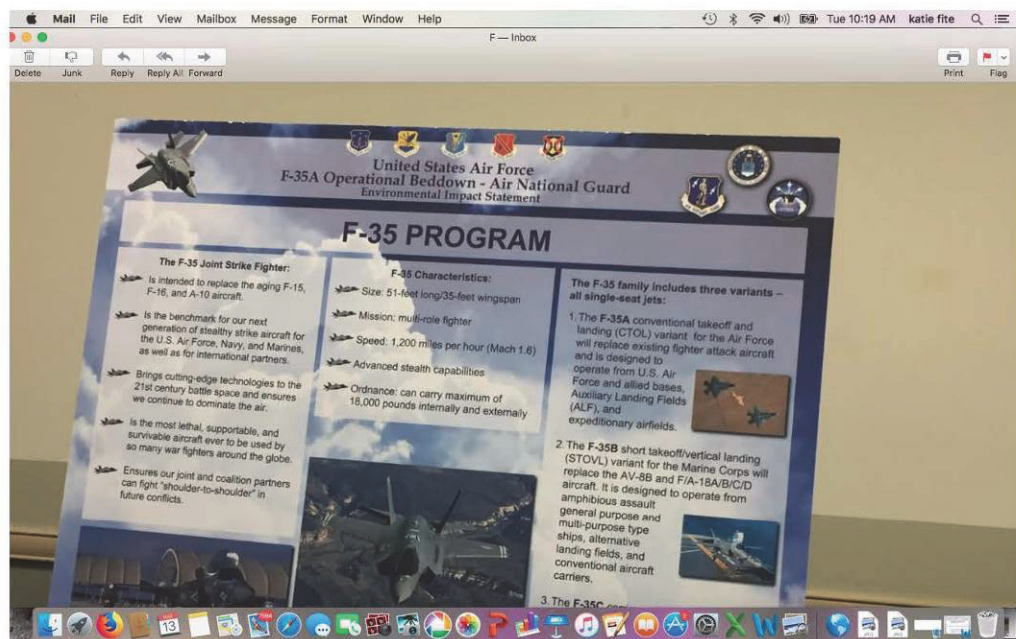
AND: "Sullivan pointed out that if impacts from the military's activities are likely to be significant for a particular project, the military segments that project into multiple pieces, so that several EAs (rather than one comprehensive EIS) can be prepared. This strategy allows it to portray the impacts described in each EA as below the threshold of significance. This is illegal. It is called "impermissible segmentation" under NEPA (40 CFR 1500-1508), which prohibits the breaking up of a larger project into smaller components that separately might have negligible impacts, but would, if considered together, likely be significant. It's illegal for an agency to do this".

As we describe below, and in our Attached letter regarding the MHAFB Convoy Training EA and references made in the DOPAA - such segmentation and piece-mealing of a larger Urban War Plan has been taking place, spawning the proposed DOPAA actions in MHAFB's latest segmented and piece-meal Urban Range and activity expansion move. Recently, the Air Force prepared one of its many segmented incremental EAs that include militarizing a State Highway and a also major access road across public lands. That EA authorized Highway 51 and Bruneau Desert road closures for "convoy training", scrambling GPS frequencies - along with building more buildings on its range, more use of white phosphorus, landing pads for other types of aircraft, increased use of unspecified

and unknown “illumination devices”, etc. There was no media coverage, and no public outreach or meetings of which we are aware. That EA expanded military activity both within military withdrawn lands, across public land rights of way, and onto a significant State Highway.

The DOPAA must also be seen and assessed as part of the cumulative effects of an ever-expanding military footprint across Idaho and the region associated with MHAFB. Its hoped for creation of a new War Range must be considered in light of a foreseeable F-35 beddown using the Boise airport, and/or MHAFB F-15s being replaced with F-35s.

Plus, the full battery of current and proposed MHAFB activities have not been assessed in an integrated hard look NEPA analysis. The Air Force must use this radical Urban War Range proposal process to take that hard, integrated look in an EIS with wide-ranging public notification and involvement.



Poster displayed at 2018 IDANG F-35 Scoping Meeting in Boise stating F-15s are to be replaced by F-35s.

Aborted Public Meetings

Many Boise citizens were planning on attending the Air Force CAS Urban War Range scoping meeting that was to be held on March 12th. The meeting was canceled on the morning of March 12th. The Air Force now claimed it needed a panel of experts to explain the War Game proposal. The AF also said there was little attendance at the initial

meetings – well that is because the AF did no media releases, and only sent out an e-mail notice of the meeting to a very limited “stakeholder” e-mail list it had. The first meeting was scheduled just 6 days after the scoping meetings were announced. We are very concerned that the AF will try to claim little public interest – when in fact citizen organizations and individuals had worked to inform large numbers of the Boise community of the upcoming meeting. WLD members were planning on attending, along with many other people. Also, we have never encountered an agency scheduling scoping meetings with so little advanced notice or without media releases.

https://boiseguardian.com/2018/03/12/air-force-aborts-scoping-meetings/?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+boiseguardian+%28Boise+Guardian%29

Note in the editors Comments with the above *Guardian* article: Members of the public, unaware it had been canceled, showed up for the meeting. It is also unclear when the Scoping period ends, as new public meetings have not been scheduled. The whole process has been highly irregular.

Immense Civilian Population and Public Lands and Resources Impacted

What is the current human population underneath the 30 nautical mile diameter circles around the Nine Urban areas, and the flight paths the planes will take between them and commuting to MHAFB? Please provide much clearer and detailed mapping of flight paths. It appears this activity will take place outside existing MTRs? What are the current areas and heights and other controls on military overflights across the project Footprint? This is necessary to understand the complete impact to populations and public lands resources. It appears the population affected is around a million people.

What is the population of the affected area projected to be in 2028? In 2038? This proposal will impact the lives, health, and well-being of half or more of Idaho citizens.

Idaho is the fastest growing state in the Nation, and much of that growth is taking place right within the area targeted for this massive new military Range.

<http://abcnews.go.com/US/idaho-fastest-growing-state-population-us-census-bureau/story?id=51903202>

Re: Treasure Valley.

<http://www.idahostatesman.com/news/local/article190738949.html>

“The news may come as no surprise to those of us in the Treasure Valley. Earlier this year, Meridian was named the nation’s 13th fastest-growing city, and Ada and Canyon counties accounted for 50 percent of the state’s population growth in 2016.

Idaho officials estimate that our state could swell to 2 million residents by 2025.”.

Many thousands of new homes are platted in the area - including in areas south, east and west of the Boise Airport that would be overflowed under the DOPAA (and potentially subjected to hellish F-35 noise as well).

Much of the still rural areas underlying the War Game zone and surroundings are expected to become even more densely populated in the near future. Thus, even more residents and their children and animals will become adversely impacted by this immense and unprecedented Military War training airspace and land activity grab.

DOPAA’s Military Takeover Has Public Lands, Recreation and Wildlife Impact

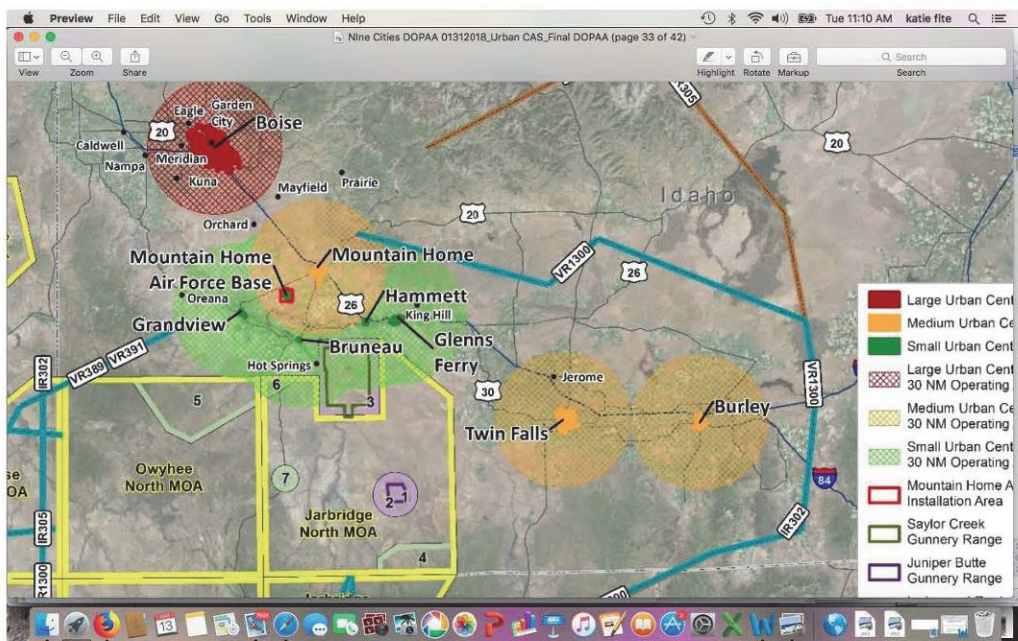
The DOPAA states: *“Aircraft would be flown at an altitude of 10,000 to 18,000 feet above ground level within a 30-nautical mile operating area for each urban center. Ground teams would support flight tracking within the ground area directly underlying the operational airspace using radio communication equipment. Realistic Urban CAS training requires that all members of each ground support team behave in a manner typical of any community member to avoid drawing attention to themselves or the operations. Thus, ground support personnel would be unarmed and dressed in plain clothes. Members of each ground support team would be inside civilian vehicles driving along paved streets and paved roadways during training operations”.*

While the ground people may be on paved roadways (for now), the airplanes will be noisiously growling overhead at high noise levels. As far as paved roads, this on the ground activity has the potential to impact many areas of public lands and recreational use areas in town and close to towns. For example the road to Bogus Basin is paved, approx. 12 or so miles of the lower Mud Flat road is paved, various roads near the Snake River Canyon are paved, Highway 51 is paved, Highway 789 is paved, Simco road is paved, etc.

There are paved roads all around and running through the Snake River Birds of Prey Area, for example. The SRBOPA area already suffers a great military burden from IDANG OTA training. The Guard has been the cause of many fires that destroyed significant habitat in that area over the years.

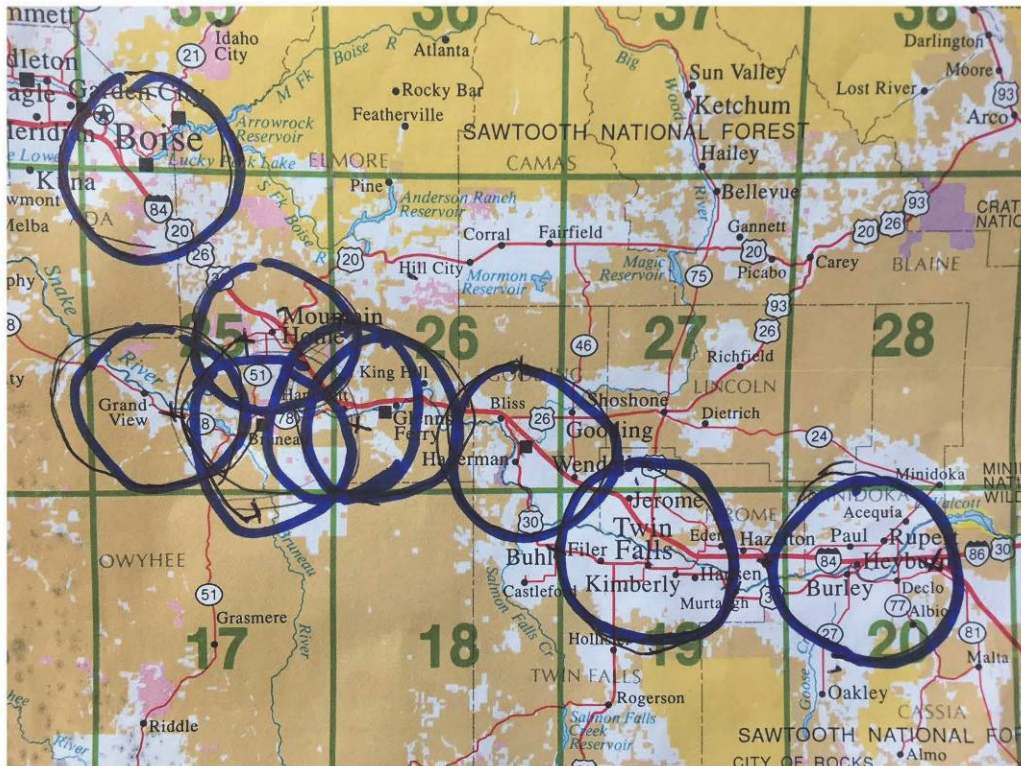
Residents of Urban populations like Boise frequently recreate in public recreational areas close to and within town –ranging from the Foothills to city Parks. The overflying military aircraft noise and potential for training accidents including inadvertent mis-use of technology will be imposed on people not only in and surrounding their homes, but also while they are outside recreating. How many parks are under the overflight areas (15 NM CAS circles and throughout the circle as well as flight paths)? Residents of Idaho urban areas will be unable to escape the incessant noise of these War Games, not in their homes, not at work, and not while trying to relax or recreate.

Public lands in Owyhee County have already been turned into a noise Hell Zone in many places due to incessant military plane noise. Now this proposal seeks to extend the military noise and other disturbance footprint even further onto public lands (in Ada County, Twin Falls County, Cassia County not yet militarized portions of Owyhee County, etc.). The Air Force seeks to carve out the equivalent of a new military Range in one of the only areas that does not have MHAFB USAF airspace over it. As the MAP of the DOPAA (when compared with a BLM land status maps and USFS maps) shows -- The military activity would extend onto Boise National Forest lands, and southern Sawtooth Forest sage-grouse habitat lands - those near Albion - plus 15 NM extends onto the Minidoka Ranger District lands south of Twin Falls.



Note immense land area under this proposed new Range. How large is the land area, and what is the land ownership/status?

Once the Air Force gets either Air or Ground space, it proceeds to expand activities. Example: Convoy training EA.



This is a very rough overlay on a map showing public lands. Tan is BLM, and yellow is USFS managed public lands. This also depicts how some smaller cities may face incessant, multiple and overlapping disturbance from being under multiple City CAS 15 NM zones.

This also shows how disingenuous the DOPAA is in focusing on only the Nine Cities claimed to be impacted by the proposal. The 15 NM mile radius overlays Burley, Rupert, Paul, Declo, Heyburn, Albion, Hansen, Kimberly, Twin Falls, Filer, Eden, Wendell, Gooding, Hagerman, Bliss, Mountain Home, maybe Buhl, King Hill, Garden City, Eagle, Kuna, and part of Meridian – plus recreational lands in and surrounding these sites.

Is There a Link to National Guard OTA and Surroundings Activities, or Potential State of Idaho Land Actions?

There have been recent efforts to expand the Idaho Guard's ground-based activities in Idaho. A few months ago, the BLM scoped a proposal to grant Rights of Way to the state for access to state land it would lease to the Guard for expanded activity. That was inexplicably withdrawn, but may not have gone away. Feeble reasons were given as to need – with the Guard oddly claiming ground squirrel shooters in the SRBOPA were crimping their training.

There are now rumors of a potential state land trade of some kind in the SRBOPA.

Do any Guard activities at Orchard Creek or elsewhere interface with USAF or IDANG training activities in any way? If so, where and how? Are there foreseeable changes – as large portions of the SRBOPA and OTA underlie the proposed Urban War range?

What foreseeable state land actions may take place or may the military be contemplating in the project area and its surroundings? For example, there is the long pending proposed state-BLM land exchange at Big Hill, just on edge of the project area – where the state inexplicably seeks a rugged dry high point that is very poor grazing lands. There have been concerns that the state seeks the land to use it for various military purposes.

FAA Role, Civilian Flight Concerns

What is the FAA role in overseeing, regulating, or granting permission to the Air Force to carve out new range airspace at 10,000 to 18,000 feet, or other elevations flights involved with this range may take place?

Has the FAA been allowing military activity in the 10,000 to 18,000 ft. zone already? If so, what NEPA or other analysis has been conducted? Is this found on aviation maps?

Won't incessant military use of this space - including use of technology like lasers or other military devices - potentially interfere with civilian aircraft? Will civilian pilots or passengers in planes in this airspace, or above or below it, be exposed to various military devices?

How is this airspace currently used and designated at present? Has there been a public process or NEPA process regarding it? If so, when and what did that entail?

Fore-Ordained Outcome NEPA Process

The Air Force states:

*Purpose. The purpose of the Proposed Action is to ensure F-15E aircrews from the 366 FW can conduct Urban CAS proficiency training within the full range of urban ground and airspace environments with ground support from JTACs. **Only this combination of training conditions would adequately simulate the current mission realities of urban combat.** ??? Really? Isn't this whole process a fore-ordained conclusion, then?*

This sets the stage for an entirely biased NEPA process, and will not result in a full and fair NEPA Process. The DOPAA Purpose and Need for the upcoming EA arrives at a fore-ordained conclusion – only this single Nine Cities alternative action will do. In Internet searches, we can find no place where any other branch of the Service has ever proposed such an unprecedented ground and air War range over top and within an urban population in the U. S – let alone impacting a million people. This alone demonstrates the

need for an EIS to be prepared.

The statement that only the proposed action will do - is shown to be false by the broad array of proficient CAS training that has been taking place at other bases across the country, and where MHAFB can also practice – rather than harming half the civilian population of Idaho. MHAFB could also place more facilities at Saylor Creek. Regrettably, the AF has already burned up nearly all native vegetation in a long series of “range” fires, within Saylor Creek that spread to surrounding lands. See Attached excerpts of the Urban CAS training taking place and facilities expanded from the MHAFB Convoy EA.

The AF DOPAA states: *“if significant impacts were predicted, then USAF would decide whether to provide mitigation to reduce impacts below the level of significance, undertake the preparation of an EIS, or abandon the Proposed Action”.*

The impacts ARE highly significant. This action can’t be mitigated. It is highly controversial as it intrudes in many significant ways on Idaho citizens lives and property, and exposes citizens to lasers, noxious noise, increased air pollution, and other adverse environmental effects that may also impact health. It represents a danger to civilians – what if a training F-15 crashes into the 10 story buildings in downtown Boise, for example?

It is impossible to effectively mitigate these activities, which are likely to mushroom over time. Please provide detailed information and analysis of what any mitigation measures would be.

The Air Force already admitted that the impacts are very controversial (and thus highly significant). See Convoy EA, and Comments Attachments showing EA excerpts.

The project must be abandoned. However, if the AF persists in this effort, it must prepare an EIS and inform the huge human population impacted by mailing information about the proposal to each household.

Public Lands Impacts, “Protected” Species Concerns

The DOPAA loosely references “protected species”. What does the DOPAA mean by “protected” species? There are many BLM sensitive and Forest Service sensitive species/species of concern inhabiting the public lands that may be impacted or disturbed by incessant plane noise, or exposed to lasers or other harmful military activity, suffer disturbance that disrupts use of habitats, endure intrusive noise that disrupts communication, reproductive behavior, etc., as well as other adverse impacts. These species are considered sensitive because of the rarity or declining populations due to habitat loss and human disturbance.

Please provide full baseline current site-specific data and analysis on these sensitive

species occurrence, their habitats (and the quality and quantity of habitat), the status of their local and regional populations, and the threats these species currently face. How will this proposal add to the threats faced by these species? How much plane noise or other activity disturbance will they be exposed to? What will the impacts of day military activity be on these ? Of night activity? Of laser use or other technological devices that may be used? How much will plane noise increase over sage-grouse populations south of Twin Falls and Burley, fore example? Will overflights or other military activity displace water fowl using the Snake River, WMAs, or other areas?

The DOPAA states: “USAF is required to manage impacts on protected species and their habitats, floodplains, and wetlands in accordance with AFI 32-7064, Integrated Natural Resources Management, which *includes the USAF guidance for compliance with the Endangered Species Act, Executive Order (EO) 11988, Floodplain Management, and EO 11990, Protection of Wetlands.*

Although intermittent populations of federal- and state-listed species, floodplains, and wetlands are within several of the urban centers where Urban CAS training could occur, the proposed training activities would not impact these resources. No impacts would be expected because operations would not involve ground disturbance and would avoid areas where protected species and their habitats exist”.

How does noise affect wetland and aquatic species? What happens if a military plane (F-15, foreseeably F-35 or other) crashes or has to drop low or otherwise malfunctions over, into or near wetlands and the many species that inhabit them? There are state wildlife areas, the Snake River Birds of Prey Area and the Snake River, and other high value wetlands in the project Footprint. These are also areas highly used by the public for recreation, and military noise and overflights may interfere with enjoyment of that use, or impact animal behavior – affecting birders, sportspeople, etc.

Has Urban CAS Training Been Taking Place Outside the Owyhee Ranges?

The DOPAA states: “Currently, Mountain Home AFB is home to three fighter squadrons (two F-15E squadrons and the Royal Singapore Air Force squadron of F-15SGs) under operational control of the 366 FW. Aircraft based at Mountain Home AFB conduct more than 90 percent of their flight training in the Mountain Home Range Complex (MHRC). The MHRC consists of the Saylor Creek and Juniper Butte Gunnery Ranges as well as airspace that consists of six military operations areas (MOAs) and an associated Air Traffic Control Assigned Airspace (ATCAA), allowing aircraft to train at altitudes up to 50,000 feet mean sea level (MSL). The MOAs within MHRC airspace are Paradise North, Paradise South, Owyhee North, Owyhee South, Jarbidge North, and Jarbidge South. Additionally, other aircraft from Air Combat Command, Air National Guard, sister services, and foreign allies regularly train in the MHRC. Although F-15Es are flown through all nearby airspaces, military training routes, MOAs, Federal Aviation Administration and ATCAA - controlled airspaces, all authorized Urban CAS training is

currently restricted to Mountain Home AFB and its ranges”.

THIS shows the Air Force already has an immense area – millions of acres – to conduct its Urban CAS “training” in, including simulations and existing fake building sites. It also shows it is highly foreseeable that Singapore planes, transients and other foreign military planes will eventually be using the Urban War Range. Also, as we discuss – the F-15 is slated to be replaced by F-35s. Elsewhere, the DOPAA describes that the IDANG uses all its Range space. So if F-35s beddown at Gowen/Boise airport, it is highly likely they will use the Urban War Range.

Has there been unauthorized or other Urban CAS activity taking place over Idaho citizen populations? Please specifically respond to this? ^{[[1]]}~~SEP~~ If so, when, where, how many sorties, and what on the ground activities? Has there been other CAS training – in a gray area between authorized or unauthorized? If so, how was it authorized? Please see our later questions about use of state facilities, guard-related activities, etc.

No one has provided a satisfactory explanation for intrusive military aircraft at times circling, and circling, and circling for prolonged periods of time over and around Boise annoying Boise residents in their homes and workplaces. The military plane activity already taking place here interferes with citizens’ work, quality of life, recreation and other activities. The adverse health impacts of exposure to noise are cumulative.

Baseline of All Military Plane Activity Across Project Area Must Be Provided

Please provide detailed baseline information on ALL military plane or other activity (including IDANG, transients, planes from other bases, foreign military, etc.) that currently takes place within the project area and MHAFB Ranges. Be sure to include any “training” that has taken place within the Nine Cities area from 2008 to the present including any Urban CAS activities.

What is the SEL noise level for all of these training activities at all elevations they are being flown? What will it be with the DOPAA proposal? How far will noise travel, and at what levels, under various terrain and weather conditions – as this proposal would impose the activity during all types of weather conditions?

The MHAFB Complex already includes a vast array of facilities. The Air Force is always incrementally adding more, and expanding its activities and footprint. It has also expanded the adverse military footprint within the ranges and across Idaho and other public lands.

Examples:

AF 2008-2009 large MHAFB airspace expansion including over portions of the Jarbidge Wilderness.

AF Singapore F-15 Beddown EA.

AF NEPA for use of white phosphorus on Saylor Creek.

AF NEPA for Convoy Training closing State Highway 51, and many changes in existing Range use, and aircraft (such as V-22s, new construction on Range, etc.).

There have been many more incremental changes and NEPA documents in between those listed above. From the “Enhanced training in Idaho” (ETI) Juniper Butte Bombing Range days forward, please provide a summary of all the changes and expansion of airspace, activities, facilities, etc., and the environmental effects of these activities- including on the public, recreational uses, wildlife, etc.

Further, IDANG has a large land area (OTA) of > 150,000 acres. There have been recent efforts to expand this that have been pulled back (ROWS on BLM land to new OTA Range south of Freeway by Mountain Home), but the proposal may come back in a different form. A major stat-BLM land exchange has also been floated (by MHAFB). It is also necessary to provide detailed analysis of the cumulative and foreseeable footprint of military activities in the project footprint and surrounding lands across the AF Ranges and Military airspace/MOAs. There are likely other efforts we are unaware of, and that have not been made public.

Immense Battery of Flights

The civilian population of southern Idaho will be subjected to an immense never-ending battery of military flights. The EA states: “*Urban CAS operations are discussed in terms of training events, training operations, sorties, and flight operations. A training event involves a collection of training operations [sic] conducted within a 24-hour period. A training operation involves the roundtrip (i.e., departure and return) flights of multiple F-15E aircraft from the installation to meet a defined training objective. The roundtrip flight of each aircraft involved is one sortie ...*

The baseline total for flight operations at Mountain Home AFB is approximated at 70,704 operations per year and includes all Mountain Home AFB and transient aircraft operations (AFCEC 2017). Approximately 260 training events involving approximately 6,760 flight operations are conducted annually for Urban CAS training. Thus, the annual total of Urban CAS operations represents approximately 9.5 percent of the installation’s annual baseline for flight operations”.

Also, the DOPAA states: “*The existing proficiency training in Urban CAS on the installation involves the flying of unarmed F-15E aircraft within an altitude of 10,000 to 18,000 feet (ft) above ground level within a 30- nautical mile (NM) operating area and support from JTACs from the ground area directly underlying the operational airspace. Ground support personnel are dressed and behave in a manner that is consistent with the civilian community to avoid drawing attention to the operations. To facilitate aircrew*

tracking of identified targets, lead JTACs may be positioned in or on buildings in areas that provide broad lines of sight. Remaining ground support personnel may be positioned anywhere on the installation such as in vehicles driving along streets or parked along the side of a road, walking along sidewalks, or walking into or out of buildings”.

This military on the ground activity and military operatives on and in buildings where unknowing civilians are present is really creepy and sinister. So is the lurking around parking lots sidewalks, neighborhoods and walking into or out of buildings. Citizens may come in the line of sight (or “fire”) of lasers and other military devices. Lasers are increasingly used for video streaming. Military personnel may use civilians for “cover”. This is a military infringement on the public’s right to peaceably use public spaces as well as private spaces and their own residences/buildings/property. Domestic animals and wild animals may come in the line of sight of lasers.

Moreover, Idaho is passing or contemplating ever-more dangerous gun laws (“stand your ground”), and very restrictive and murky trespass laws. There is potential for citizens to over-react, and harm military ground personnel. See:

<http://www.idahostatesman.com/news/politics-government/state-politics/article204633849.html>

“Ominous words from the Idaho Attorney General’s Office on two pending pieces of legislation:

“The overlap between the proposed (bills) would likely increase the risk of serious injury or death to otherwise innocent trespassers.”

The disguised military ground personnel in and on buildings and on roads, parking lots, etc. run the risk of sparking dangerous encounters with civilians who take them for trespassers, or otherwise become concerned and “stand their ground”.

Also: “The “stand your ground” legislation has moved fairly seamlessly through the legislative process. However, the bill rewriting Idaho’s trespass laws got off to a rocky start, with groups representing law enforcement, attorneys, hunters, fishermen and public access deeply opposed. Its first draft may have been unconstitutional, and sportsmen fear it contains too many incentives for landowners to sue ...

A last-ditch effort to save the trespassing measure appears to have solved its constitutional problems, and it passed the House by a vote of 45-22 Monday. But the controversial bill could still have unintended consequences”.

Will civilians be able to sue the ground personnel?

The AF did an extremely inadequate job of communicating with Stakeholders, including local elected officials, and all the citizens living with this massive military Range

expansion proposal.

This is a huge Range Expansion, and must be called that. It involves both ground and air activities. The activities currently conducted on a military range are being shifted to noxiously intrude a huge civilian population.

Questions abound: What is all the “electronic communications” equipment that will be used? Please be very specific and detail all the equipment and what it does and explain specifically how it will be used. Are threat emitters considered communications equipment? What type of radar will be used? What are potential hazards of health effects of this radar?

Air Force DOPAA Ignores Broad Range of Reasonable Alternatives

The Air Force structured the Purpose and Need statement so that only a single alternative can be chosen. This is part of a pattern of how the Air Force structures nearly all their EAs. The Air Force ignored a range of reasonable alternatives to be assessed under NEPA. Here are reasonable alternatives that must be considered, in whole or in combination:

- Periodically fly and train intensively at other Military sites and their perfectly adequate state of the art Urban CAS ranges on military land – like Nellis. MHAFB goes to other ranges all the time for Red Flag/Green Flag/War Games anyway. Many fewer civilians exposed to harm. <http://www.airforcesmonthly.com/2016/08/21/new-usaf-f-16-cas-training-squadron-planned-for-nellis/>
- -Build more fake buildings at Saylor Creek. The DOPAA asserts planes can't fly to the other sites because of time, fuel cost, whatever. Fine, save TIME and FUEL by building more fake buildings at Saylor Creek - rather than using fuel flying 100 miles each way to Burley. The Air Force uses fuel and time as an excuse: “we couldn’t possibly train somewhere else” to constantly expand its footprint. This has the pattern for decades. Fuel savings, civilians not exposed to harm. This greatly reduces civilian exposure to harm.
- Use video games/simulations. Fuel and time savings, civilians not exposed to harm.
- Construct fake buildings/CAS facilities on MHAFB. Fuel and time savings will be considerable. Many fewer civilians exposed to harm.

Use a combination of the above. Periodically go to Nellis, Yodaville, etc. Also use simulations to train. Also build more fake buildings at MHAFB or other sites. Make more efficient use of time and fuel.

Just today there is news of a military plane crash, killing two pilots. It was over water.

What if it was over top Boise?

<http://www.flkeysnews.com/news/local/article205190754.html>

Proposed Action Is an Unprecedented Intrusion Into U. S. Civilian Lives and Property

The DOPAA states: *USAF proposes to: 1) **establish air and ground training spaces in urban centers located proximally to the installation and within Idaho that would adequately simulate the large, medium, and small urban centers encountered during combat, and 2) **establish an Urban CAS aircrew proficiency training regime in the selected urban centers.** This action would not increase flight operations for the installation. Rather, it would distribute existing flight operations among the installation's ranges and airspaces and the air and ground spaces at the urban centers that are identified as also able to accommodate the proposed training.***

So there are three parts to this military Range intrusion into the lives and property of Idaho civilians: The Airspace, Ground Space, and constant imposition of a 'Training Regime'.

Further: *The Proposed Action includes six components: 1) aircraft, 2) personnel, 3) airspace, 4) ground operating areas, 5) air and accompanying ground operations, and 6) simulated munitions.*

What are the simulated munitions that will be used? What happens if someone makes a mistake and there are real munitions? What devices will be used? Will threat emitters be used? What equipment that emits electromagnetic radiation will be used? What radars will be used? Please provide detailed information. Hasn't the military has developed new radar that can be harmful to humans and animals? What devices specifically will be used on the ground and in the air? How will these potentially impact humans, domestic animals, and wildlife?

What technology and devices will be on the planes involved? Will flares, chaff, threat emitter devices, a range of lasers? What about on the ground? What exactly do all urban warfare training devices entail? Please describe laser technologies and devices that would be used by on the ground crews or planes Please describe in detail. On-line sources show lasers include IR lasers, UV lasers (many animals see UV), and lasers potentially transmitting video including images of unknowing Idaho citizens or their property across the project area.

Will apartment dwellers or office occupants in Boise's "Urban Canyons" become unwitting "targets" of war game technology such as this? Will they unknowingly look into lasers? Will lasers or other activity disturb or displace wildlife? Will pilots of small planes? What is the real risk of collateral damage? Will civilians unknowingly or

accidentally become Targeted by close proximity to the military ground personnel playing War Games?

Further, on-line sources show that “another military use of lasers is as a laser target designator. This is a low-power laser pointer used to indicate a target for a precision-guided munition, typically launched from an aircraft. The guided munition adjusts its flight-path to home in to the laser light reflected by the target, enabling a great precision in aiming. The beam of the laser target designator is set to a pulse rate that matches that set on the guided munition to ensure munitions strike their designated targets and do not follow other laser beams which may be in use in the area. The laser designator can be shone onto the target by an aircraft or nearby infantry. Lasers used for this purpose are usually infrared lasers, so the enemy cannot easily detect the guiding laser light”. Will people walk into or drive into the path of this laser or other device use? Or look out their apartment windows in the Urban Canyons of downtown Boise, and be exposed to it? Will they be in video streams/images taken or used by the military during this activity – whether intentionally or unintentionally?

What are the exact specifications of what is an eye safe laser? Of what is not an eye safe laser? Do lasers switch back and forth between modes of intensity? Will any of this interfere with increasing citizen use of or reliance on electronic devices – from garage door openers to timers to high tech equipment?

The AF states: *Aircrews would consist of two pilots and at least one weapons system operator per aircraft. Ground personnel involved in the training operations would form two operating teams: FFOR and OPFOR. Up to 15 personnel would simulate FFOR and would include JTACs. Up to 20 personnel would simulate OPFOR.*

This is lot of people lurking around certain buildings, neighborhoods, public spaces – using lasers or other devices on a year round basis.

This is also concerning, because the ground crews could be a foot in the door for IDANG use of this new range. Will IDANG or other Guard personnel be used? IDANG is seeking beddown of the noisiously loud F-35s. The DOPAA states: “*The Proposed Action would use existing aircrew personnel operating at Mountain Home AFB*”. Does this include pilots? How is an aircrew defined? This includes, Singapore, too. Will Singapore pilots train in F-15Es? Will Idaho’s civilian population and our health and safety be sacrificed for training by military personnel from other bases and other countries. Will all pilots involved in this be based at MHAFB?

Military bases often jostle for “ratings” with one another – so as to ensure maximum federal dollars flowing to them. That was certainly the case with MHAFB and the Base Realignment Commission in past years. Is this proposal partially related to that?

Many private businesses may not want their parking lots used for military purposes.

Paved roads may access private residences. Many Idaho citizens do not want this militarization of their cities and neighborhoods. The DOPAA states: *Generally, ground teams would be driving along paved public roads. Vehicles may, momentarily, parked along the side of a paved road, sidewalk, or in parking lots, to allow individuals to exit the vehicles to establish or re-establish communications with aircrews. Uses of routes and surface parking lots would be coordinated, as required by DODI 1322.28, with the appropriate government authorities.*

Review and Questions about DODI 1322.28

The DOPAA references the proposed actions using protocols of DODI 1322.28, “Realistic Military Training (RMT) Off Federal Real Property”

DODI 1322.28 appears riddled with exceptions and uncertainty, with many loopholes and “deviations” described below. It appears to allow huge loopholes in notification of local authorities, and notification of citizens, of what is taking place. This elevates concerns about accidents, hostile encounters or reports to police of by citizens concerned about lurking ground personnel, laser use, or other activities civilians may perceive as threatening. The DOPAA states:

Further, all activities would be conducted in accordance with local laws and ordinances and with the goal of leaving no trace of their activities on cultural or natural resources. Any deviations from these restrictions would be coordinated and approved in accordance with DODI 1322.28, Realistic Military Training off of Federal Property.

What are all local laws and ordinance referred to here?

Does any of this War Game military invasion of public space, property and privacy violate the Idaho Constitution or the U. S. Constitution?

The military DODI policy referred to in the DOPAA is found here.

<http://www.esd.whs.mil/Directives/issuances/dodi/>

www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/132228p.pdf

The DODI Applicability section states that it applies to: “ ... DoD forces (including general purpose forces (GPF) and special operations forces (SOF)) training off federal property in the United States or its territories ... ”. So does that mean if the War Games are taking place in the parking lot of the Federal Building, the BLM office, a USDA research lab, etc. – various DODI notification and other policies do not apply?

There appear to be many exceptions where the DODI “coordination”, “notification” with authorities and other provisions appear to be not required. This list of exceptions is at

DODI p. 2 and 3, which states: *b. Does **not** apply to*".

It appears that state lands or properties and private facilities (potentially spaces in buildings in the downtown Urban Canyons of Boise and in urban areas in general) where it appears this directive would not apply include:

DODI (1) Training at private, commercial, State, or local facilities that have been specifically developed, established, or operated for the purpose of training such as that which will occur during the proposed training event.

Since nearly all buildings in Urban Canyons are privately owned, this activity could take place with unwitting customers, neighbors, residents, passersby and civilians in general being exposed to, feeling threatened, being captured on video, and otherwise impacted by the AF. We are also very concerned about state and city facilities – as the same could apply there. The state of Idaho has not shown it listens to, or cares about, civilian exposure to potentially harmful military activity. In fact, the State has gone to extreme lengths to lobby for and try to attract noxiously loud F-35 war planes to Boise. These planes will harm residents health, rive people from their homes, cause plummeting home values, make it so children can not play outside at home or school, expose Boise airport users from around the world to harmful noise, etc.

See <https://boiseguardian.com/2017/01/22/otter-joins-bieter-using-citizen-money-to-lobby-for-f-35-at-gowen/>

"With unlimited resources in the form of citizen's tax dollars at their disposal, the establishment politicians have nothing to fear from those who oppose noisy fighters over Boise.

Betsy Russell wrote last week in her SPOKESMAN REVIEW blog that Otter asked for \$100,000 in citizen money to lobby for the F-35 which is roundly opposed by residents of the Boise Bench, especially near the airport.

Russell wrote, "Otter added a \$100,000 supplemental appropriation request for the state Department of Commerce to promote and lobby for the recruitment of an F-35 mission and other future missions at Gowen Field, as the current A-10 mission winds down." The money will come out of the Dept. of Commerce budget ...".

The state of Idaho subsequently got the funds, and used it for pro-F-35 lobbyism and boosterism. This bodes ill for the State being concerned about civilians being exposed to, or caught up in the midst of, the War Game proposal. Similarly, the Boise mayor has gone to great lengths to promote F-35s ignoring health, safety and property concerns of Boise residents.

DODI (2) Individual education or training activities at non-DoD academic institutions, including field activities within their curriculum.

Does this mean a BSU ROTC group could form the basis for an exception? Please explain.

DODI (3) National Guard training activities while training pursuant to Title 32, United States Code (U.S.C.) (Reference (e)).

Does this mean the proposed War Game activity could be snuck in/shoe-horned in, under cover of a National Guard exercise or other activity? Could the military use something taking place at the OTA or Gowen Field as an excuse to conduct this? Has Urban CAS Training already been taking place in the proposed project War Game area using this or other loopholes?

DODI (4) Unmanned aircraft system (UAS) operations in accordance with Reference (d) with the pilot or controller of the UAS off federal property but independent of other ground maneuver or targeting activities.

Does the Air Force foresee or plan to use drones in association with any of the Urban CAS training/War Games of this proposal in any way? If so, where and how? If so, how will this use impact people (annoying drone noise close to the ground, overflights over private property, etc.), startling animals (including wild animals which often have a strong negative reaction to drones). Example: Eagles and other birds of prey attack drones. There are nesting peregrine falcons in Boise's "Urban Canyons". Bighorn sheep and antelope are spooked and startled by them. What potential dangers are there? We just read of a drone crashing in Arizonan and starting a wild land fire. Note that War Planes will soon not have pilots, as Technology replaces humans. This increases risks.

DODI (5) Aviation forces (not in conjunction with ground participants located off federal property) operating in accordance with Reference (d) ... WHAT does this mean? This must be explained.

DODI (8) Transit operations between federal property and training sites conducted in accordance with prevailing local, State, and federal law where no unusual maneuvering, tactics, techniques, or procedures are evident to the public.

What is by "unusual" maneuvering? Or by Tactics? Techniques? Procedures? Please provide a detailed description, and solid info on the sideboards of all of these terms and what they mean in a real world situation. Many Boise residents find it highly "unusual" for the military to be seeking to impose any War Games in and overtop of the city, for example.

There are many significant risks that we are identifying and raising in these comments, and we believe these are not able to be effectively mitigated: *“b. By its nature, training off federal property, particularly in private or commercial urban settings, raises unique legal, policy, public affairs (PA), media, safety, and coordination issues that must be considered as part of the planning, approval, and notification process. Comprehensive and effective risk identification and mitigation is instrumental to safe conduct of RMT and limiting the associated administrative burden”*.

ALSO: *c. To accommodate military training needs and the unique interests and concerns of civilians and the media in the area of training activities off federal property, it is necessary to establish uniform planning, risk assessment, and approval guidelines for the conduct of such training.*

The document further states:

It is DoD policy to:

a. Use training environments off federal property when required once they have been properly coordinated with local (e.g., civil, tribal, and private) authorities and when the requirements of this instruction have been met.

BUT didn't the DODI just state under applicability that if the training involves state sites, areas specifically for the purpose, private property, that such coordination with local authorities did not apply???

Under the DODI, the AF is also to *“minimize disruption to civilians”*. Imposing an unprecedented War Game Range in the air and on the ground affecting a million people is not *“minimizing disturbance”*.

The DODI states under General Procedures and Risk Assessment: *“c. Risk assessment factors that must be included in the assessment are:*

(1)Exposure and interaction with civilian population (e.g., physical presence and activity, noise levels, radio frequency interference).

ALL of this noise etc. and much more - such as high power radar use and other devices - must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses, and for all lands and civilian populations impacted by the War Game footprint in any way. For example, will THIS type of radar and imaging be used -spying inside people's pickups, house windows, etc. as the “War Games” are played?

The AN/APY-7 radar can operate in wide area surveillance, ground moving target indicator (GMTI), fixed target indicator (FTI) target classification, and synthetic aperture radar (SAR) modes.

To pick up moving targets, the Doppler radar looks at the Doppler frequency shift of the returned signal. It can look from a long range, which the military refers to as a high standoff capability. The antenna can be tilted to either side of the aircraft for a 120-degree field of view covering nearly 50,000 km² (19,305 mile²) and can simultaneously track 600 targets at more than 250 km (152 miles). The GMTI modes cannot pick up objects that are too small, insufficiently dense, or stationary. Data processing allows the APY-7 to differentiate between armored vehicles (tracked tanks) and trucks, allowing targeting personnel to better select the appropriate ordnance for various targets.

The system's SAR modes can produce images of stationary objects. Objects with many angles (for example, the interior of a pick-up bed) will give a much better radar signature, or specular return. In addition to being able to detect, locate and track large numbers of ground vehicles, the radar has a limited capability to detect helicopters, rotating antennas and low, slow-moving fixed-wing aircraft.

See: https://en.wikipedia.org/wiki/Northrop_Grumman_E-8_Joint_STARS

(2) Nature of operations (e.g., live fire, aviation, close quarter battle training [are CAS ground people included in this?], day or night operations, tactics, techniques, and procedures).

ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife area and business, and for all lands and civilian populations impacted by the War Game footprint in any way

(3) Sensitivity of the terrain and included facilities (e.g., environmental, schools, hospitals, nuclear installations).

ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way. There are schools, nursing homes, hospitals, assisted living and other facilities including myriad work places, and zoos and vet clinics. There are also many agricultural facilities in the area to be overflown and it is very unclear how wide-ranging ground personnel operations will be. There are businesses that use harmful and dangerous substances where explosions, gas releases, or other things that may take place in the event of a plane crash pose a serious hazard. There are wildlife habitat areas, too. ALL of these sites must be identified

(4) Terms of use of the objective facility (e.g., liability, clean up, and repair)

ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.

(5) Nature of DoD presence (e.g., weaponry, vehicles, uniforms, movements).

ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife area, business and for all lands and civilian populations impacted by the War Game footprint in any way.

(6) Presence, nature, and impact of fixed and rotary wing aircraft operations including unmanned aerial systems.

ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.

(7) Presence, interaction, and applied capabilities of non-DoD agencies (e.g., law enforcement, Department of Energy, Department of Justice).

ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.

What does the Department of Justice have to do with this? Does the AF plan to use buildings where federal workers are housed? If so, will the workers be informed?

(8) Degree of local, State, and federal political and public interest.

There is an ever-growing high degree of public concern and interest in this proposal, now that Idaho citizens have gotten the word out about it.

This is an unprecedented Range expansion adversely impacting almost a million people. The AF's Convoy Training EA admitted urban CAS over civilians was very controversial. See Attached letter.

(9) Nature of PA activities (active or passive) and presence.

What does this mean? Define "PA" in detail. ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.

(10) Availability and response time for DoD and non-DoD emergency services.

ALL of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.

What happens to a city block or neighborhood if an F-15 crashes? Will the area be evacuated? What toxic substances will people potentially be exposed to? What happens to someone if the wrong laser or laser setting or other harmful device injures a person in any way?

The DODI also states:

Appropriate real property agreements for each training site will be executed with private property owners or government property managers.

(1) Agreements will address liability and conditions of usage of property. Property owners will be informed of the nature of the training, including written notification of activities involving training pyrotechnics, live or simulated ammunition, frequency band use, aircraft or UAS, when (day or night) training operations will be conducted, and whether any population nuisance factors (e.g., noise, smells, radio frequency interference) are anticipated.

Noise, radio frequency, radar and potential harmful effects, lasers and other devices and potential harmful effects, vehicles and vehicle accidents of disguised ground forces, lurking disguised ground forces startling/scaring civilians, air pollution from planes and vehicles – all are nuisances to the civilian population. All must be analyzed in great detail. Further, PLEASE do not average sound over long periods of time in any noise analysis– what is the SEL and other real noise levels that will be encountered by citizens?

(2) Prior to document approval and signature, real property agreements must be reviewed by the command legal office for legal sufficiency.

(3) Copies of the signed agreements must be provided, if requested, to the senior local civilian officials responsible for the affected civilian environment, and if requested, to State and federal authorities. For copies of an agreement with private landowners requested by civil authorities, information considered private may be redacted by the component legal representative at the request of the land owner.

Will all these agreements be posted on-line and be public knowledge so civilians can avoid use or patronage of the affected private properties so as not to expose themselves to ground War Games? Will **WARNING Military Training and Devices! War Games in Progress** signs be posted on buildings sites/facilities/locales to be used for the War Game

training –or those areas covered by the “MOAs” referenced below? We request that this be required. Notices should also be posted in papers, and the Air Force should maintain a list of all agreements and sites used for War Games at the MHAFB Website.

RMT events that are recurring under the same general concept of operations (CONOPS) at the same location may be based on a documented CONOPS and a memorandum of agreement (MOA) with the appropriate authorizing civilian officials or a land use agreement with the property owner(s). The terms of the MOA will comply with the requirements of this instruction and include planned dates of execution

This also references media. Will there be daily and nightly alerts so that visitors to Idaho urban areas are not unwillingly exposed to /caught up in these exercises? Will there be training warning signs posted at the Boise airport? At Freeway exits? Or by buildings where this activity/War Games are taking place? We request this be mandatory.

The DODI defines a category III event:

“Category III, major risk. RMT events, including extremely high and high mitigated risk factors, conducted in urban environments including significant interaction with civilian population and events assessed to have a high probability of the occurrence of a significant incident that would result in personal injury to the public or disruption to civilian activity. Media attention would be rapid with national visibility.

The MHAFB CAS Urban War Game proposal is a **Category III major risk proposal**.

We have also found THIS link to an attachment to a Marine description of DODI 1322.28. It gives the military extensive discretion, through use of non-binding, weak and uncertain terms like “when appropriate”. This is fraught with loopholes.

<http://www.marines.mil/News/Messages/Messages-Display/Article/896431/realistic-military-training-off-federal-real-property/>

“REF (B) CONTAINS A NUMBER OF ADDITIONAL REQUIREMENTS FOR COORDINATION WITH CIVILIAN AND MILITARY OFFICIALS WHEN PLANNING RMT OFF FEDERAL REAL PROPERTY. IN ADDITION TO THE REQUIREMENTS CONTAINED IN REF (A), COMMANDERS WILL ALSO TAKE INTO ACCOUNT THESE ADDITIONAL REQUIREMENTS WHEN PLANNING RMT OFF FEDERAL REAL PROPERTY. THE ADDITIONAL REQUIREMENTS ARE:

2.A. WHEN APPROPRIATE, COMMANDERS SHALL COORDINATE WITH APPROPRIATE CIVILIAN LAW ENFORCEMENT AGENCIES (LEA) TO RECEIVE AN ORIENTATION BRIEFING ON THE AREA IN WHICH THE TRAINING WILL BE CONDUCTED.

2.B. WHEN APPROPRIATE, PLANNING SHALL INCLUDE A MEDICAL EVACUATION PLAN FOR PARTICIPATING PERSONNEL AS WELL AS A COMMUNICATIONS PLAN FOR MILITARY ELEMENTS CONDUCTING THE TRAINING.

2.C. IN ADDITION TO CONSULTING WITH CIVILIAN LEA, WHEN DEEMED

APPROPRIATE, COMMANDERS WILL SEEK INPUT FROM MILITARY POLICE LOCATED IN THE VICINITY OF THE PROPOSED TRAINING”.

Does the AF have something similar?

What existing agreements are in place with local officials.

Detailed Air Pollution, Noise, Safety/Risk and other Analysis Is Required – More Concerns

The DOPAA states: *During a training operation, 2 (or a maximum of 4) aircraft would depart the installation, enter the CAS wheel outside of an urban area, enter the urban center airspace to conduct training (for a duration of 60 to 90 minutes), then returning to the installation. Thus, a training operation would involve 2 (or a maximum of 4) sorties.*

This is confusing as later the DOPAA says that 4 planes would only be present for changing shifts.

Some areas would get potentially overflown many, many times (Glenns Ferry for example).

The AF has not revealed the travel paths that will be used it will take to all of the Nine Cities and the 15 Nm area surrounding them, or how many repeated overflights many areas will suffer each day.

A training event may involve day or a combination of day-night training operations. Day training would occur between the hours of 7 a.m. and 10 p.m. Night training would occur between the hours of 10 p.m. and 7 a.m.

This is outrageous – the AF intends to disrupt people’s peace, quiet and sleep at night, and defines “night” as starting at 10 pm. Tell that to parents of small children. Disrupted sleep leads to many serious health issues.

The AF states:

Annually, a maximum of 260 Urban CAS proficiency training events (involving 650 training operations) would be expected to be conducted across all identified urban centers.

This means that 260 days a year, weekends, holidays included, Boise and other cities’ residents and much of the civilian population of southern Idaho will be subjected to this incessant noise additional air pollution sky in non-attainment or close to non-attainment airsheds including during times when conditions are really bad. This activity will also be marring the skies - as contrails that result in cloudy conditions result on what otherwise would be a bright sunny day, etc.

A current detailed baseline of the existing air pollution from military and non-military sources across all affected lands, areas and airsheds must be provided. Then, the pollution caused by the War Game activity and transit must be assessed.

Detailed analysis of the pollution from the thousands of overflights in and around the CAS wheel and in transit to MHAFB must be provided. How will the impacts vary/pollution stagnate --- under varying weather conditions?

How might these levels change under various foreseeable different war plane type scenarios (such as the F-35). Please carefully consider the information in this article, as it is likely F-15s will be replaced by F-35s, and/or the IDANG may acquire F-35s adding to the air pollution in the Boise airshed, as will F-15E War Games including cumulatively:

<https://boiseguardian.com/2017/03/15/not-just-noise-f-35-health-is-in-the-air/>

Not Just Noise, F-35 Health Is In The Air

March 15, 2017 · Post a comment

By Denise Seigart
PhD, MS, RN, Wharton Fellow
Resident of East Boise

I believe the current debate regarding the placement of F35s here in Boise is focused on the wrong issue. The noise created by these jets will indeed be intolerable and damaging to physical and mental health, but I believe this is the least of the effects we in the Boise Valley will suffer. The air pollution created by F35s will be far more damaging to the health of our citizens than the noise. According to the 2012 environmental report produced for the Boise area, F-35s can annually release these additional pollutants into the Ada County air:

F-35 emissions

- 1.63 tons of Volatile Organic Compounds
- 161.82 tons of Carbon Monoxide
- 129.50 tons of Nitrous Oxide
- 13.26 tons of Sulfur Dioxide
- 3.26 tons of large particulates
- 3.16 tons of small particulates
- 48,725 tons of carbon dioxide

This will vary of course by the number of planes actually placed in Boise and the numbers of flights, but it is likely the pollution caused will be well above what we experience now based on existing plane traffic. While the environmental impacts are often measured on a regional scale, I think we need to ask what the local effects of these pollutants pouring into the Boise Valley will be.

Given the inversions and wildfire smoke we suffer each year, and given that Idaho in general is ranked one of the States with the poorest air quality in the nation (United Health Foundation; 2015), I find it remarkable that we are being considered at all. Atlantic County, NJ was being considered for placement of F35s, but their poor air quality was partially responsible for their rejection. I believe we can make the

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WHAT will these levels be for F-15s? The Guardian article also describes:

Given the inversions and wildfire smoke we suffer each year, and given that Idaho in general is ranked one of the States with the poorest air quality in the nation (United Health Foundation; 2015).

AND the Guardian continues: "Air pollution complex mixture exposures... of children and teens in natural settings are characterized by early dysregulated systemic, brain, and intrathecal inflammation; production of potent vasoconstrictors and autoantibodies to

key neural proteins; and perturbations in the integrity of the neurovascular unit and the nasal, olfactory, gastrointestinal, and alveolar-capillary barriers. In highly exposed children, the accumulation of misfolded hyperphosphorylated τ , α -synuclein, and β -amyloid coincides with the anatomical distribution observed in the early stages of both Alzheimer and Parkinson diseases. (Calderon-Garciduenas, Torres-Jardon, 2015)

How much fuel (gallons) will be burned annually with F-15s? With F-35s or other foreseeable planes using the range? Will there be in-air refueling and chance of spills?

Please also establish a baseline of contrail pollution of skies across the project area. Contrails coalesce to turn blue sky days gray. How much will War Game activity contrail marring of skies and their pollution increase with the War Games intensive activity? What is the current baseline –under all weather conditions? How much less sun and blue sky will each area and the total area receive? How will that impact people's health and state of mind?

See: <http://www.pbs.org/wgbh/nova/space/contrail-effect.html>

Whether contrails cause a net cooling or a net warming, even whether their effect is something to worry about within the greater general concern about climate change, remains unclear. But with air traffic expected to double or even triple by 2050, leading contrail researchers say the influence of these artificial clouds cannot be ignored.

OUT OF THE BLUE

A contrail will form behind a jet if, as exhaust gases cool and mix with surrounding air, the humidity is high enough and the temperature low enough for liquid water to condense

...

A LINGERING CONCERN

If conditions are right, newly formed contrails will begin feeding off surrounding water vapor. Like vaporous cancers, they start growing and spreading. In time, they can expand horizontally to such an extent that they become indistinguishable from cirrus clouds, those thin, diaphanous sheets often seen way up high. These artificial cirrus clouds can last for many hours, and the amount of sky they end up covering can be astonishing. One study showed that contrails from just six aircraft expanded to shroud some 7,700 square miles.

See also: <https://phys.org/news/2011-03-airplane-contrails-worse-co2-emissions.html>

In a recent study published in Nature Climate Change, Dr. Ulrike Burkhardt and Dr. Bernd Karcher from the Institute for Atmospheric Physics at the German Aerospace Centre show that the contrails created by airplanes are contributing more to global warming than all the CO₂ that has been caused by the entire 108 years of airplane flight. AND: they have discovered that aviation contrails play a huge role in the impact on the

climate and an even greater impact than that created by the CO₂ emissions produced. While the CO₂ emissions from airplanes account for around three percent of the annual CO₂ emissions from all fossil fuels and change the radiation by 28 milliwatts per square meter, the aviation contrails are responsible for a change of around 31 milliwatts per square meter.

The only difference is that CO₂ has a longer life than that of the contrails, and can still continue to cause warming even hundreds of years down the road.

The researchers believe that while continuing to reduce CO₂ emissions in aviation, more work needs to be done to reduce contrails as well.

How much closer will this push Boise and the Treasure Valley to Air Quality non-attainment? How will this pollute the air of surrounding public wild lands, where the pollution may ultimately end up, as well? How will this affect quality of life, or the climate? Blah, gray skies affect people's mood and sense of well being.

What is the current military air pollution level from all planes (including transients that make up a significant portion of the Boise airport military planes)?

Won't some areas be overflowed time after time in transit – and so they will suffer larger pollution loads? Won't the Large and Medium cities suffer higher loads since there are fewer of them, too? (And thus they will suffer more training).

How many contrails on the average day or night are in the skies over these nine cities 15 NM circles now? How many are military sources? How larger are military contrails?

Where are all MTRs, or other routes used by the planes - and what are flight levels? What are other military sources of contrails and pollution? How about civilian aircraft in the area? The Boise airport recently announced that use had increased. HOW much more pollution can the airshed withstand and not be pushed into non-attainment – including as the population increases? The military should be looking to DECREASE its pollution in this airshed, and its climate change footprint (which also must be assessed in detail here) rather than increase it?

To what degree will overflights – for example, going back and forth to Boise or Burley from MHAFFB – occur over other cities/towns - thus significantly increasing disturbance to the poor citizens who inhabit these areas? This will take place over many poorer communities in Idaho- so aspects of the War Game proposal are a matter of economic justice. Just look at the nightmare of circles near Glens Ferry, for example. Further, will Urban area training disproportionately impact low income areas of cities?

Note that F-15 pilots have recently had oxygen deprivation issues – increasing the likelihood of a crash or mishap. <http://www.businessinsider.com/air-force-picks-general-investigate-oxygen-loss-hypoxia-incidents-2018-1>

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A physiological event happens when pilots experience symptoms that can be caused by a number of factors, like hypoxia, that can cause dizziness, confusion, and impair a pilot's ability to fly.

These incidents have not been limited to those aircraft. Pilots of F-22 Raptors, F-16 Fighting Falcons, and F-15 Eagles have reported hypoxia-like incidents in recent years. An F-22 pilot was killed in a 2010 incident in which his oxygen system cut off; the cause for the malfunction has not been found.

Nor is the problem limited to the Air Force — Navy pilots in the T-45 Goshawk training aircraft, F/A-18 Hornets, Super Hornets, and EA-18G Growlers have also experienced hypoxia-like incidents at an increased rate over the past several years. Hypoxia-like symptoms have been linked to the deaths of four Navy F/A-18 pilots.

What toxic, dangerous or hazardous materials are there in F-15s, and other military planes that may potentially or foreseeably use this War Game Range in the future — including F-35s? Are the stealth coating or other aircraft materials carcinogenic?

The DOPAA states: At least 75 percent (or 195) of the anticipated annual training events would involve day training operations. During day training, aircrews and ground support teams would conduct two training operations (including one between 7 a.m. and 12 p.m., and the other between 2 p.m. and 10 p.m.) per 24-hour period. On these days, an estimated maximum of 3 hours of dedicated flight activities over an urban center would be expected. At least 70 percent of the anticipated total number of day training operations would involve 2 aircraft flying in the CAS wheel and operating over an urban center. At least 30 percent of the total number of day training operations would involve 4 aircraft to incorporate proficiency training in operational hand-offs. Thus, a total of 390 day training operations, comprised of 1,014 sorties (4,056 flight operations) could be expected per year. [11] [SEP]

Why does the Air Force consider 9:59 pm to be “daytime”? Many people with young children put them to sleep very early. Plus people work all kinds of shifts, and must sleep in the day — this is especially true of lower wage jobs, hospital workers and others. Day time use will also interrupt sleep, cause health problems and make people less alert in their work.

At least 10 percent (or 26) up to a maximum of 25 percent (or 65) of the anticipated annual training events would involve two day training and two night training operations within the 24-hour period. Each training operation would be followed by a 2- to 3-hour period of no flight activity during which ground teams would organize for the next training operation ... Assuming the maximum percentage (i.e., 25 percent), a total of 260 combined day-night training operations involving 676 sorties (2,704 flight operations) would be expected per year. [11] [SEP]

This is an outrageous military intrusion into the lives, health, safety and private property

of Idaho citizens.

What will be the SEL noise citizens will be exposed to at 10,000 ft.? What might cause planes to fly lower than 10,000 ft. Will any of these planes be landing or originating from the Boise Airport, for example if experiencing difficulties?

The DOPAA states: *Operations would be conducted in some combination of large, medium, and small urban centers.*

This means Boise would be inflicted with this War Game activity almost every time! This maximizes the disruption of the largest number of citizens. DOPAA Table 2-1 shows “large” cities - i.e. Boise - up to 260 maximum “training events”.

DOPAA Table 2-2 shows how extreme this activity will be Total Day Ops Max 390, Total Day Sorties Max 1,014, Total Day Training Flight Ops Max of 4,056!

Table 2-2: Annual Envelope of Day and Day-Night Flight Operations for each Urban Center Size Category

Day Training Operations ^{1, 2}						
Urban Center	Total Day Training Operations		Total Day Training Sorties		Total Day Training Flight Operations	
	Minimum	Maximum	Minimum	Maximum	Minimum	Maximum
Large	150	390	390	1,014	2,280	4,056
Medium	120	390	312	1,014	1,824	4,056
Small	120	390	312	1,014	1,824	4,056

Day-Night Training Operations ^{1, 3}						
Urban Center	Total Day-Night Training Operations		Total Day-Night Training Sorties		Total Day-Night Training Flight Operations	
	Minimum	Maximum	Minimum	Maximum	Minimum	Maximum
Large	100	260	260	676	1,520	2,704
Medium	80	260	208	676	1,216	2,704
Small	80	260	208	676	1,216	2,704

Table Notes:
1 – At least 75 percent of day training would involve 2 training operations per 24-hour period; 25 percent of day-night training would involve 4 training operations per 24-hour period. One sortie involves two flight operations (i.e., one departure flight from the installation and one return flight to the installation) of one aircraft.
2 – At least 70 percent of day training sorties would involve 2 aircraft; 30% would involve 4 aircraft proficiency training in operations hand-off.

Total Day-Night Training Ops Max 260, Total Day-Night Training Sorties 676, **Total Day-Night Flight Ops 2704**. This latter figure is the same for all Medium and Large Cities.

Concurrent training operations at more than one urban center would be expected for 20 to 30 percent of the proposed maximum number of training days (i.e., 260) annually across all urban centers. The ability to operate at more than one urban center would allow the 366 FW the flexibility to surge proficiency training operations without concentrating the impacts of increased operations over any one urban center. Concurrent operations would be conducted at an anticipated maximum of two of the identified urban centers per training day and could involve day or day-night training operations. [SEP]

Does concurrent mean occurring at the exact same time or occurring at some point within the 24 hour period?

The DOPAA states: *In such instances, vehicles would be momentarily parked along the roadside, sidewalk, or in a surface parking lot. Operations would not require the use of any buildings, and would not be conducted near schools, hospitals, churches, or cemeteries.* [SEP] THIS is contradicted by descriptions elsewhere in the DOPAA of use of buildings and other disguised ground personnel activities. Just because use of buildings is not “required” does not mean it will not take place!

Define “near” – what specific distance is “near”? Won’t vehicles drive by these sites, and isn’t part of the War Game targeting people in vehicles, too? Won’t planes fly over these sites, too?

Again, many Idaho citizens do not want strangers lurking around parking lots and neighborhoods. They do not want radar or videos imaging their vehicles or person or homes. It may frighten people. And it may be dangerous for both the disguised personnel and residents.

The DOPAA states:

FFOR would consist of up to five civilian type vehicles with up to three passengers per operating vehicle. FFORs would direct aircraft using a variety of tactical communication devices (e.g., frequency modulation radio, very high frequency radio, ultra high frequency, and satellite communication radios). Additionally, FFOR may use data link systems to receive or transmit analog or digital information to the aircrew. Each of these devices would be operated on pre- approved, dedicated military frequencies. OPFOR would use up to five civilian type vehicles in various convoy scenarios with up to four passengers per vehicle. [SEP]

Just what information will be transmitted? Will it include video of people’s homes, cars, property, the people themselves, their animals, etc.? What will happen to any video and any data that may have personal information of a sort, or images of citizens or their property?

We are concerned because in the past Air Force overflights in Owyhee County have essentially been used to inform authorities of civilian activities taking place. We can envision false alarms, intrusions into people's private lives, etc.

The DOPAA states: *Prior to mission training operations, F-15E aircrews would maintain flight in a circular path, known as a CAS wheel, in the airspace that overlies the farther outskirts of town or the outermost edge of the 15-NM radius from the urban center point. Two, or a maximum of four, aircraft would fly in the CAS wheel at any one time.*

This will seriously impact public lands and wildlife inhabiting them as well as many rural residents and their pets and animals. In some cases – the 15 NM will put the planes right over one of the Nine Cities – or other cities which the AF does not clearly reveal will be impacted.

It's as if someone thought they were developing a video game with this War Game proposal - that in no way reflects the real world impacts, and the noise, disturbance threats to humans and animals, disturbance to public lands and wildlife that this proposal will cause.

*The aircraft would separate from the CAS wheel, fly toward the urban center point, and be guided with instrumentation and communication to identify, track, and simulate neutralization of the OPFOR. **The two aircraft would fly throughout the airspace overlying the city** in a wedge formation where the lead aircraft would be positioned at a lower altitude and ahead of the second aircraft. The second aircraft serves to cover the lead aircraft from a higher altitude and reasonable distance behind, where visibility surrounding the first aircraft can be maintained. Flight tracking of OPFOR would continue until the point of simulated weapons fire. Upon mission completion, the aircraft would return to the installation.*

Does this mean that the center of urban Areas, i.e. the places with the highest population densities and most civilians to be exposed, annoyed and harmed - would most suffer this disturbance the most?

The DOPAA also mentions fake Bombing. What does the fake Bombing entail? What devices are used?

The DOPAA states:

All interactions between air and ground teams would be achieved through use of electronic equipment including tactical communication radios (e.g., frequency modulation, very high frequency, ultra high frequency, and satellite communication), navigational GPS for maintaining awareness of target locations, low-power, eye-safe infrared training lasers for marking targets, and computer simulation systems on board

the aircraft.

Please provide detailed information and the exact specification of all the devices and activities here. What are the specific frequency ranges that the devices in the air and on the ground will be using? How might these high frequencies, and lasers, or other devices that may be used impact people, domestic animals, and wildlife? Aren't lasers used as wildlife deterrents? Aren't some animals' eyes more sensitive than humans, and retinas likely to be damaged? Won't lasers used at night disturb wildlife?

Is the Air Force Giving Itself an “Out” to Ignore Analysis of Many Aspects of the War Range – by Claiming they Were Previously Analyzed?

The DOPAA attempts to avoid substantive analysis of critical aspects of the three part War Range scheme. The DOPAA states: *For this EA, the analysis of impacts on the human environment and natural resources assumes that the anticipated annual maximum number of Urban CAS proficiency training operations required by the 366 FW would be distributed to any one of the nine urban centers that meet the ... standards. Because Urban CAS training operations already occur on the installation at the maximum proposed operational tempo, and the negligible to minor impacts resulting from these operations have already been analyzed and addressed in accordance with NEPA, this EA will not address impacts on the installation or in the MHRC (Mountain Home AFB 2017).*

The reference is: Mountain Home AFB. 2017. Final Environmental Assessment for Operational Changes and Range Improvements in the Mountain Home Range Complex. May 2017. [Note that the Final EA here was dated 2016].

Singapore Beddown – Is Use Being Shifted onto Urban Population to Make Room for Foreign Military Use at MHAFB Remote Ranges?

Our on-line searches for documents related to the Urban War proposal unearthed a brand new late 2017 Draft EA to beddown even MORE War Planes at MHAFB. Who was this document provided to? In searching for this document, we found the following:

http://www.mountainhome.af.mil/Portals/102/Documents/environmental/20171220_MHAFB%20RSAF%20Beddown%20Public%20Draft%20EA.pdf?ver=2017-12-21-100103-127

This proposes to beddown additional foreign (Singapore) planes at MHAFB. Is this massive shift of CAS War Game training onto a civilian population to potentially make room for MORE foreign military training by Singapore at Saylor Creek/Owyhee Ranges? Or are they the new pilots that will need more training - that are referenced in the DOPAA? How foreseeable is it that various Singapore planes will be using the CAS airspace in the future? Or that Singapore pilots will be flying F-15Es for Urban War training over a million civilians?

From the Singapore DEA p. 2-3:

*The beddown of six additional F-15SGs at Mountain Home AFB would include an increase in total airfield operations and sorties. As shown in Table 2-3, annual sorties at the airfield would increase by approximately 12 percent **and annual operations would increase by approximately 14 percent.** It is assumed that approximately 10 percent of total airfield operations and sorties would be conducted during the environmental night, from 10 p.m. until 7 a.m.*

This is quite similar to the Percent of MHAFB training that constitutes Urban CAS taking place at the Saylor Creek/Owyhee Ranges, and which would be transferred to Boise et al. [SEP]DOPAA Page 1-5: *"The baseline total for flight operations at Mountain Home AFB is approximated at 70,704 operations per year and includes all Mountain Home AFB and transient aircraft operations (AFCEC 2017). Approximately 260 training events involving approximately 6,760 flight operations are conducted annually for Urban CAS training. Thus, the annual total of Urban CAS operations represents approximately **9.5 percent of the installation's annual baseline for flight operations** [SEP]*

[SEP]It appears the Idaho public may be suffering big plans unfolding – without ever being told the full story by the military. This appears to be segmented and piece-mealing of NEPA. What are all the components of the military plan that is unfolding? Segmenting and piece-mealing connected actions is a violation of NEPA.

The Saylor Creek Range Complex is within the 15 NM zone of impact of Urban areas - how will this impact activity?

There is a reference in the DOPAA entitled: AFCEC: U.S. Air Force Civil Engineering Center (AFCEC). 2017. AFCEC Noise Program, Noise Model Operational Data Documentation (NMODD) Deliverable for the Mountain Home Air Force Base 2018 Air Installation Compatible Use Zone (AICUZ) Study. Prepared for Mountain Home AFB by Leidos. July 2017.

We requested this reference from Ms. Shaver, and were told it was not complete yet. So how can the Air Force cite it as a basis for the DOPAA?

The DOPAA states: *The MHRC does not have the required population, vertical development, or artificial lighting to adequately simulate a medium or large urban environment. In fact, the MHRC does not have any capability to simulate the dynamic environment of an urban community. Urban areas provide real-time considerations, much like deployed operations, to ensure the mission would be executed without involving noncombatants and minimizing collateral damage. Further, although the installation and MHRC do have limited vertical development, they do not adequately simulate the challenges presented by the urban canyons of medium and large urban centers that are created by buildings of varying shapes and sizes. This unique problem presents multiple challenges associated with finding and tracking points of interest. Lastly, different levels and types of lighting are difficult to simulate on the MHRC. To*

provide artificial lighting that would adequately simulate the medium or large urban environment on the MHRC would require development of building with lighting infrastructure on the existing gunnery ranges.

THIS entire DOPAA claim is shown to be false by the 2016 Convoy Training EA, for the MHRC. SEE Attached excerpts, and Convoy EA.

Then how has the Air Force managed to proficiently train all these years? Plus the convoy Training EA talked about “illumination” on the existing ranges and other matters the AF complains about here. The Air Force uses all kinds of lighting right now – including hazardous fire causing White Phosphorus (used in War Crimes) at Saylor Creek. See Attached Convoy EA Excerpts showing lighting capability at SCR, and the Convoy EA discusses all kinds of “illumination” and its expansion.

Infrasound Concerns

Please provide detailed analysis of the Infrasound levels and impacts from the War Planes flying over Urban areas for prolonged periods of time.

Infrasound travels FURTHER than higher frequency sounds. What will the infrasound levels be

At the other end of the spectrum are very low-frequency sounds (below 20 Hz), known as **infrasound**. Elephants use infrasound for communication, making sounds too low for humans to hear. Because low frequency sounds travel farther than high frequency ones, infrasound is ideal for communicating over long distances.

<https://www.nps.gov/subjects/sound/understandingsound.htm>

<https://www.popsoci.com/technology/article/2012-11/acoustic-weapons-book-excerpt>

“Because infrasound can affect people's whole bodies, it has been under serious investigation by military and research organizations since the 1950s, largely the Navy and NASA, to figure out the effects of low-frequency vibration on people stuck on large, noisy ships with huge throbbing motors or on top of rockets launching into space”.

AND: “The commonality of infrasonic vibration, especially in the realm of heavy equipment operation, has led federal and international health and safety organizations to create guidelines to limit people's exposure to this type of infrasonic stimulus”.

https://ntp.niehs.nih.gov/ntp/htdocs/chem_background/exsumpdf/infrasound_508.pdf

Laser and other Device Changes and Complexity

We are very concerned about the type of lasers and their use and potential for accidents. Lasers used may also change over time. The potential adverse effects and risks to the public (residents in buildings, on the streets, in their yards, in cars, in planes, etc. must be fully examined.

The effects of lasers in disrupting wildlife activity must also be examined.

NPS on Lasers:

The National Park Service Website cautions visitors to parks to LEAVE LASERS AT HOME. It states:

Spotlights/laser pointers – Spotlights and laser pointers can be disruptive to animals and are prohibited items in some parks.

<https://www.nps.gov/subjects/watchingwildlife/gear.htm>

Wikipedia on Free Space/Lasers

https://en.wikipedia.org/wiki/Free-space_optical_communication

Useful distances[[edit](#)]

The reliability of FSO units has always been a problem for commercial telecommunications. Consistently, studies find too many dropped packets and signal errors over small ranges (400 to 500 meters). This is from both independent studies, such as in the Czech republic,^[10] as well as formal internal nationwide studies, such as one conducted by MRV FSO staff.^[11] Military based studies consistently produce longer estimates for reliability, projecting the maximum range for terrestrial links is of the order of 2 to 3 km (1.2 to 1.9 mi).^[12] All studies agree the stability and quality of the link is highly dependent on atmospheric factors such as rain, fog, dust and heat.

The DOPAA refers to considerable Urban War Game activity in inclement weather. How will this impact lasers and other devices (of all kinds) being used?

What kind of laser transmits video?

<https://science.howstuffworks.com/laser-communication.htm>

Once the military gets the use of lasers in a Training Range – anything can happen with incremental changes over time, or accidental use of devices.

An on-line source describes lasers streaming video, and raises many other issues about laser use on the ground and in the air and radar.

https://www.researchgate.net/profile/Hemani_Kaushal/publication/319993452_Applications_of_Lasers_for_Tactical_Military_Operations/links/59c9291745851556e97a55cb/Applications-of-Lasers-for-Tactical-Military-Operations.pdf

Is any such use planned or foreseeable in any activity described below and in this article associated with the MHAFFB proposed Urban War Range?

The laser technology offers several benefits over conventional RF or microwave systems for tactical operations. Although traditional RF and microwave frequencies are excelling on many fronts, they become vulnerable or non-effective under certain scenarios such as real-time threats, tapping, jamming, low bit rate, high latency, large size, weight and power (SWaP). Since the bandwidth provided by the optical system (due to high carrier frequency) is much higher than the radio or microwave systems', lasers are capable of disseminating large volumes of data or video information in the battlefield, often in real time".

This refers to UV light, and a "high energy" beam:

Various parameters used to classify lasers for diverse range of applications are: output power, operating wavelength, beam cross-sectional area at the point of interest, accessible emission limit and exposure duration. For example, lasers used for tactical military communication with very low probability of interception/detection requires high-energy collimated laser beam and adjustable beam divergence in order to avoid spillage of the signal beyond the target receiver. Further, the choice of wavelength depends upon transmission window for atmospheric or underwater links ... Further, in order to facilitate challenging battlefield environments that may include diverse terrain (desert, urban, mountain, water body) or signal congestion/ denial, ultraviolet spectrum is the viable option to establish non-line-of-sight (NLOS) laser link. NLOS or beyond-LOS (BLOS) links are generally used as command and control links that require low data rates as compared to LOS links that require high data rates for ISR.

... Laser designators give the precise marking of ground-based or airborne targets especially for small-sized and well-defended targets. The principle of designation requires the target to be illuminated by the laser beam, either by ground forces or by a gunner on the fighter plane. The reflected light from the target is captured by the host platform or weapon system that allows the automatic tracking of the signal to provide

accurate target information to the aircraft, navigation or weapon aiming system. Fig. 2 demonstrates the concept of LTDs in combination with a laser-seeking missile that looks for the reflected laser beam from the target and destroys it. Unless the enemy has abundance of laser warning detectors, it would be difficult to tell who is being targeted.

From <http://ieeexplore.ieee.org/document/8048469/>

What if civilians accidentally get “illuminated” by a laser (or become a “target of opportunity” as happens out on areas of the MHA FB at times)— and don’t want to be? What TYPES of radar will planes be using, and what are their effects and potential risks??

Laser designators give the precise marking of ground-based or airborne targets especially for small-sized and well-defended targets. The principle of designation requires the target to be illuminated by the laser beam, either by ground forces or by a gunner on the fighter plane. The reflected light from the target is captured by the host platform or weapon system that allows the automatic tracking of the signal to provide accurate target information to the aircraft, navigation or weapon aiming system ... As compared to traditional RF radar, laser radar provides enhanced accuracy in range measurement, velocity and angular displacement. In addition, the material composition of the target can also be determined by measuring certain properties of the reflected light, such as Doppler shift. LIDAR is generally used for soft targets like chemical or gas detection whereas LADAR is used for hard targets.

Note the difference between conventional and other radar and eye safety described below:

These laser remote sensing devices are used for various applications, such as 3D terrain mapping, battle damage identification (BDI)/battle damage assessment (BDA) in real time, improved mission planning from 3D mapping, detecting and sensing chemical agents, airborne laser mine detection system (ALMDS) for counter-mine warfare, unmanned vehicles navigation and guidance, et c... The distance that can be sensed by these devices depends upon the peak power, beam divergence, atmospheric losses, target reflectivity and detector sensitivity. It has to be mentioned here that active EO systems may not always be advantageous over conventional radar systems. The conventional radars are operational in all weather conditions (except for very heavy rains), have lower life-cycle cost, requires no eye safety regulations and are stealthier than the active EO sensing devices.

C. Laser Communication Systems

With the upcoming trend of electronic warfare, military operations demand broadband capacity with the highest level of security. Nowadays, tactical operations are enabled

with large volumes of ISR imagery and video data that are being transferred from sensing locations to battlefield grounds. Also, timely access to critical information delivered to soldiers in the battlefield can change the war game. For this reason, laser communication, also known as free space optics (FSO), is a good choice owing to its high carrier frequency, ultra-low latency and immunity towards EM radiation. Besides LOS communication, NLOS EO laser communication utilizing UV radiation is also studied for military applications ... Despite the many benefits of laser communications, this technology has considerable limitations, that prevent it from being a direct replacement for conventional RF communication. The performance of laser links is very susceptible to varying weather conditions and it deteriorates during heavy fog, smog or high temperature circumstances. For this reason, military bodies around the world are looking at the laser communication as a technology to augment the existing RF-based system or keep it handy to provide assistance in case of jamming. Laser communication systems are generally designed for short-range point-to-point or multi-point configurations, where other communication networks are practically impossible to be installed.

Figure 5 here shows a surveillance camera - will these be used in the War Games?

The DOPAA describes activity in poor weather conditions.

Will there be UAVs?

We also note this:

Another dimension where lasers can improve the military capability in future battlefield operations is its use as weather modifier. Since weather plays a dominant role in military operations, therefore, any ability to control it can bring a significant change in the war scenario. Lasers can be used as weather modifiers by using directed energy sources; they then provide enough energy to the localized region of the atmosphere to change its weather. High Frequency Active Auroral Research Program (HAARP) conducts various experiments, using electromagnetic frequencies to analyze the behavior of ionosphere, in order to enhance military communications and surveillance capabilities for defense purposes [106] ...

The bottom line is that all of the activities of this Urban War proposal over a million people, and the devices and their risks and potential for harm must be fully examined in an EIS if the Air Force pursues this unprecedented militarization of civilian space.

Please keep us fully informed of all matters related to this.

Please also consider this letter as comments on the proposed Singapore Beddown described in the AF's 2017 Singapore Draft EA.

We will also be submitting these comments and concerns for the IDANG F-35 Scoping,

as there are significant adverse indirect and cumulative effects from the Urban War proposal, and it is highly foreseeable that IDANG planes would be involved in these War Games at some point in the not so distant future.

Sincerely,

A handwritten signature in cursive script, appearing to read "Katie Fite".

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738
katie@wildlandsdefense.org

Attachments: Letter and Excerpt Documents related to the Convoy EA and Urban CAS Activity

-----Original Message-----

From: Jean [REDACTED]
Sent: Monday, March 19, 2018 8:15 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban CAS EA

This email is to request that the Boise/Mountain Home area NOT be used for Air Force training and work. This is an urban area and the noise alone will affect too many people. J. Jeffries

-----Original Message-----

From: Gene McGill [REDACTED]
Sent: Tuesday, March 20, 2018 10:35 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] RE: URBAN CAS EA

TO: Ms. Noelle Shaver, NEPA and Cultural Resources Program Manager
Serving Mountain Home Air Force Base
Air Force Institute of Technology
3155 Research Blvd. Suite 105
Dayton, Ohio

FROM: Gene McGill, CPA & CGMA
2430 W. Cherry Lane
Boise, ID 83705
SUBJECT: Comment on URBAN CAS EA
DATE: March 20, 2018

BACKGROUND

I am a registered Republican (the party of my father, an IL farmer and WWII veteran). I live less than 1.5 miles north of the Gowen Field runway near the intersection of Vista and Cherry. I was in Boise when the F-15 Eagle jets from the Mountain Home Air Force Base were temporarily training from Gowen Field. The noise from the F-15 was significantly louder than the A-10 Thunderbolt jets stationed at Gowen Field. I am concerned about elevated noise and air pollution of the F-35 jets compared to the current A-10 jets.

SITUATION

There is a proposal to establish several Urban Close Air Support training spaces over urban areas between Mountain Home and Boise as well as between Mountain Home and Burley.

IMPLICATION

The noise and air pollution from the proposed Urban Close Air Support training spaces will have a serious negative impact to the Vista Neighborhood adult residents and school children. The noise and air pollution from the proposed Urban Close Air Support training spaces will have a negative impact to the whole Treasure Valley metropolitan area.

OPPOSITION

I oppose the proposed Urban Close Air Support training spaces over urban areas in south west Idaho.

Gene McGill, CPA & CGMA
[REDACTED]

-----Original Message-----

From: Barbara Priest [REDACTED]
Sent: Thursday, March 22, 2018 11:38 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] urban warfare over Boise

Dear Ms. Shaver,

Are you stupid or crazy? The chance of disaster is too great. The noise and air pollution that it will add to our lives is huge. Have the air force build you a town out in the desert.

Thank You
Barbara Priest

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Friday, March 23, 2018 10:08 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>; ROBERTSON, SHERI L CIV
USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>

Cc: katie fite <[REDACTED]>

Subject: [Non-DoD Source] Fate of Comment Period for Urban CAS War Proposal for Nine Cities

Hello,

I have repeatedly requested an answer to my inquiry about whether the cancellation of the Boise, Eagle, Meridian, Mtn Home Scoping meetings for the Urban CAS proposal means the comment period on the DOPAA is extended, or on hold, or if th project will be re-scoped.

PLEASE answer this.

Thank you,

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701

-----Original Message-----

From: Phillip Roemer [REDACTED]

Sent: Monday, March 26, 2018 5:55 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>; ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>

Subject: [Non-DoD Source] Urban CAS War Range proposal

I would like to express my opposition to the Urban CAS War Range proposal that is being considered.

If you intend to move forward with this proposal I do have some requests for information.

I would like to see the results of an Environmental Impact Statement.

I would like to know what kind of budget you have allocated to reimburse damages from negative externalities such as: impacts on the air quality due to the increased pollution, repairing walls that may be broken by the vibrations the aircraft cause, and costs stemming from economic disruptions due to events such as closed highways or causing people who are employed during night hours to miss work due to safety concerns from being fatigued from the disturbance caused by the aircraft.

Furthermore, the Department of Defense Instruction 3025.21, along with a myriad of other laws and field manuals, gives the military the power to use force -including lethal force- against US citizens on US soil. While legal, this has been historically viewed as an inappropriate use for the military when it has happened in the past. Given that this activity is not supported by the general public, I would like to know what assurances you are offering that this urban training taking place in our cities will not be converted into training for the military to kill US citizens in the future.

I request your response to these issues.

Thank you,

Phillip Roemer

-----Original Message-----

From: John Bertram [REDACTED]
Sent: Monday, March 26, 2018 5:22 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] RE: URBAN CAS EA

March 25, 2018

Ms. Noelle Shaver
366 SES/CEE
1030 Liberator Street
Mountain Home AFB
ID 83648

Opposed to F-15 Urban Close Air Support Over Boise and South Idaho

Dear Ms. Noelle Shaver

I am strongly opposed to selecting Boise and the Region for an air and ground training space to support Urban Close Air Support (CAS). Boise is a growing capitol city with healthy neighborhoods providing a quality of life that must not be degraded by excessive F-15 noise. Boisean's outdoor enjoyment of their yards, parks, Boise River Greenbelt paths, and Ridge to River trails make our recreation quiet and relaxing.

Such F-15 training over Boise and the Region would be deafening.

Studies have found that aircraft noise significantly impairs health.

Excessive noise (above 55dB) can cause hearing impairment, hypertension, and ischemic heart disease and sleep disturbance.

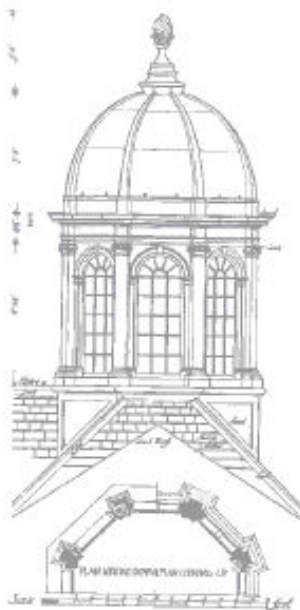
There is also a good chance for accidents over urban areas that would lead to loss of life and damage. Likewise, Boise already suffers from diminishing air quality and this training would only aggravate poor air quality. What is the amount of F-15 exhaust pollution?

Selecting Boise as a CAS would be extremely divisive to Boise's residential quality and healthy lifestyle. Such training would be an adverse condition. There are better options available such as creating a mock city at the 110,000-acre Saylor Creek Bombing and Training Range.

Also very concerned that USAF cancelled the recent public information meeting at the Boise Public Library. How can we share our concerns if there are no efforts to inform the public of the impacts of Urban Close Air Support?

Thank you for the opportunity to comment.

John Bertram
[REDACTED]



Planmakers
Planning and Urban Design

417 South 13th Street
Boise, Idaho 83702
208.336.1438

www.planmakers.net

March 25, 2018

Ms. Noelle Shaver
366 SES/CEE
1030 Liberator Street
Mountain Home AFB
ID 83648

Opposed to F-15 Urban Close Air Support Over Boise and South Idaho

Dear Ms. Noelle Shaver,

I am strongly opposed to selecting Boise and the Region for an air and ground training space to support Urban Close Air Support (CAS). Boise is a growing capitol city with healthy neighborhoods providing a quality of life that must not be degraded by excessive F-15 noise. Boisean's outdoor enjoyment of their yards, parks, Boise River Greenbelt paths, and Ridge to River trails make our recreation quiet and relaxing.

Such F-15 training over Boise and the Region would be deafening. Studies have found that aircraft noise significantly impairs health. Excessive noise (above 55dB) can cause hearing impairment, hypertension, and ischemic heart disease and sleep disturbance.

There is also a good chance for accidents over urban areas that would lead to loss of life and damage. Likewise, Boise already suffers from diminishing air quality and this training would only aggravate poor air quality. What is the F-15 exhaust pollution?

Selecting Boise as a CAS would be extremely divisive to Boise's residential quality and healthy lifestyle. Such training would be an adverse condition. There are better options available such as creating a mock city at the 110,000-acre Saylor Creek Bombing and Training Range.

Also very concerned that USAF cancelled the recent pubic information meeting at the Boise Public Library. How can we share our concerns if there are no efforts to inform the public of the impacts of Urban Close Air Support?

Thank you for the opportunity to comment.


John Bertram





United States Department of the Interior
U.S. Fish and Wildlife Service

Idaho Fish and Wildlife Office - Boise

1387 South Vinnell Way, Suite 368

Boise, Idaho 83709

Telephone (208) 378-5243

www.fws.gov/idaho



MAR 26 2018

Ms. Noelle Shaver
RE: Urban CAS EA
366 CES/CEIE
1030 Liberator Street
Mountain Home AFB, Idaho 83648

Subject: Establishment of Urban Close Air Support Air and Ground Training Spaces Near
Mountain Home Air Force Base—Ada, Canyon, Cassia, Elmore, Owyhee, and
Twin Falls Counties, Idaho—NEPA Comments
In Reply Refer To: 01EIFW00-2018-CPA-0011

Dear Ms. Shaver:

This letter transmits the U.S. Fish and Wildlife Service's (Service) comments on the Mountain Home Air Force Base's (MHAFB) description of the proposed action and alternatives for an environmental assessment (EA) for the proposed establishment of urban close air support (CAS) air and ground training spaces near MHAFB, Idaho in accordance with the National Environmental Policy Act (NEPA). The proposed action includes urban military training in nine urban centers of various sizes in southern Idaho. The Service currently has no comments regarding the proposed action.

Thank you for the opportunity to review the description of the proposed action and alternatives for the MHAFB's draft urban CAS training EA. Please contact Barbara Schmidt at (208) 378-5259 if you require additional information.

Sincerely,


for Gregory M. Hughes
State Supervisor

cc: MHAFB, Mountain Home (Robertson, Pena, Scott)
IDFG, Nampa (Compton, Bosworth)



WILDLANDS
DEFENSE

Katie Fite
PO Box 125
Boise, ID 83701
208.871.5738
katie@wildlandsdefense.org

March 28, 2018

Ms. Noelle Shaver
366 Liberator St.
Mountain Home AFB
83648

Dear U.S. Air Force, Ms. Noelle Shaver and Ms. Sheri Robertson,

Here are additional comments of WildLands Defense on the Air Force's Scoping letter and DOPAA for: *Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, Responsible Agencies: U.S. Air Force (USAF); Air Combat Command; 366th Fighter Wing. Affected Location: Urban centers located near Mountain Home Air Force Base, Idaho.*

**RE: Urban War Game CAS and Pollution, Contrails, Murky Skies Concerns –
Need for Baseline and Analysis of Proposed Action Effects**

Dear Ms. Shaver,

Here are additional comments from WildLands Defense on the DOPAA for *Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, Responsible Agencies: U.S. Air Force (USAF); Air Combat Command; 366th Fighter Wing. Affected Location: Urban centers located near Mountain Home Air Force Base, Idaho.*

Over the past year, there has been a greatly increased presence of airplane contrails over Boise. Certainly they are largely military contrails in the skies over Boise. Look at the pattern of them. Often crisscrossing, some are very broad, etc.

It has now gotten so that this activity and the pollution and contrails are nearly ubiquitous every day.

The Urban CAS NEPA (and again an EIS must be prepared) must provide a sound and honest baseline of:

- * Existing military overflights over each of the nine Urban Areas and surrounding communities and numbers, type of plane/aircraft, where aircraft is based, elevation of these flights occurring over the Urban Area;

- * Existing civilian overflights over each of the nine Urban Areas and surrounding communities and numbers, type of plane/aircraft, and where aircraft is based., elevation of these flights occurring over the Urban areas;

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* Amount of pollutants of all types each aircraft overflying the Nine Urban areas emits - including over and around the Urban Areas;

* Predictions of where pollutants in such will end up (which airsheds);

* Current baseline of military overflight activity (including any contractors aircraft) causing increase in white/gray skies and haze from pollutants and contrails above that which is already occurring from the heavy overflight burden in southern Idaho and over each of the Nine Cities.

*Urban CAS military overflight activity (including any contractors aircraft) causing increase from baseline in white/gray skies and haze from pollutants and contrails in southern Idaho and over each of the Nine Cities.

* Predictions of the Urban CAS military overflight activity (including any contractors aircraft) caused increase from baseline in white/gray skies and haze from pollutants and contrails above that which is already occurring from the heavy overflight burden in southern Idaho and over each of the Nine Cities.

*Direct, indirect and cumulative effects of all of the above flight activity on air quality, potential non-attainment, human health, causing murky skies, etc.

* The amount of increase in pollution from the Urban CAS War Game proposal, and all foreseeable airplanes and mission types conducted over the life of the proposal and Range.

* Potential health effects of murky, clouded skies and/or aircraft pollution particularly during periods of inversions, and any synergistic effects of aircraft pollution contributing to inversion conditions.

* Potential effects of pollution and contrails on climate change - both baseline analysis and Urban CAS increase analysis must be conducted. Please conduct this at the local and regional level, including candid analysis of the current military flight pollution and contrail impacts across the MHAFB remote ranges in Owyhee County.

HERE are some examples of what we are observing pollute the skies and make them murky over Boise. This is COMMON and occurs on an almost daily basis now. Please also provide any explanations for any increased military overflight activity in this area in the past 3 years.



March 28, 2018 Photo from vicinity of open space land by Sherman St. and 5th St.
Boise, ID.





March 28, 2018. Sherman area.



March 28, 2018. Sherman area.

The Following photos are from last week:



March 19, 2018. Open area near Skylark Drive, Boise, ID.





March 19, 2018. Skylark. Plane, after plane, after plane.

We look forward to a full and complete analysis of these important matters in the Urban War Game CAS NEPA process.

Sincerely,

Katie Fite

Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738
katie@wildlandsdefense.org

From: katie fite
To: [SHAWER, NOELLE C GS-12 USAF ACC 366 CES/CEIE; ROBERTSON, SHERILL CIV USAF ACC 366 CES/CEIE](#)
Subject: [Non-DoD Source] COMMENTS for inclusion in MHAFB Urban CAS Project Fwd: IDANG Simco-East Maneuver training Area and ROW EA
Date: Saturday, March 31, 2018 10:13:54 AM
Attachments: OTA 2018 IDARNG PS Letter SimcoE 3-1-18 Final.pdf
PastedGraphic-2.tiff
Nine Cities CAS Urban War Game Pollution, Contrails to AF 3-28-18.docx
military Incrementalism Dahr Jamail The Pentagon Is Using an Environmental Law Meant to Protect Us, Against Us.pdf

Hello,

Please include all information and concerns we are forwarding to you below in the MHAFB NEPA analysis of Urban CAS War Games over Nine Idaho Cities.

This project was proposed last year, then it was withdrawn. Now it has re-emerged. Note that portions of the affected lands lie under the Urban CAS 15 NM circles. This represents further militarization and disturbance to public lands and people in southern Idaho. Please take a hard look at all indirect and cumulative effects of this OTA expansion disturbance, foreseeable land trades that testate has been known to try to pursue in this area, and other related actions.

Note that another alternative (besides the ones we already submitted to you regarding there Urban CAS War Game proposal) is to build or expand existing fake building sites at the OTA.

Note also that the whole reason the Guard claims to "need" more space is that it is profiting from out of state military units of all kinds training at Orchard - so the OTA lands are getting very torn up and "crowded". The out of state Units pay the Guard for use of the range.

We are very concerned that, similarly, the Urban CAS project will morph over time into a "training" area for military units from all over and foreign countries.

I note that the very heavy military footprint and immense noise disturbance to public wild lands from MHAFB is due in part to flights/activities of military planes/forces from other bases and even other countries.

Plus the Beddown of the initial Singapore planes, and now the proposal for more, has a significant component of bringing in additional funds to MHAFB.

Please provide detailed information on any ends received by MHAFB for foreign or transient training activity, and how much of this activity is currently taking place.

<https://go.usa.gov/xnhYw> .

<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=89114&dctmId=0b0003e880f9dfd6>

The OTA expansion proposal is at the above addresses. Have also Attached it. We are very concerned about the multiple overlapping effects on a broad range of native raptors, public recreation and enjoyment of public lands and wildlife, and the risks of all of these military projects underway.

Please let me know you have received this e-mail.

Thank you,

Katie Fite
Public Lands Director
WildLands Defense

PO Box 125
Boise, ID 83701

Begin forwarded message:

From: katie fite <katie@wildlandsdefense.org <<mailto:katie@wildlandsdefense.org>> >

Subject: Fwd: IDANG Simco-East Maneuver training Area and ROW EA

Date: March 30, 2018 at 8:11:06 PM MDT

To: Lara Douglas <ledouglas@blm.gov <<mailto:ledouglas@blm.gov>> >, Amanda Hoffman
<alhoffman@blm.gov <<mailto:alhoffman@blm.gov>> >, ng.id.idang.list.ngid-emo@mail.mil
<<mailto:ng.id.idang.list.ngid-emo@mail.mil>>

Dear BLM and IDANG,

Please apply ALL concerns WildLands Defense raised in 2017 about the proposal to issue rights-of-way on BLM lands in the SRBOPA to the Idaho Guard too the 2018 identical proposal. RE: Guard letters of March 9 and 13th re:IDANG Simon East Maneuver Training Area and ROW NEPA. This proposal represents another radical expansion of military disturbance in the region.

A significant part of what is taking place is that the Idaho Guard makes money from other Guard or military branches that use the OTA. So this underlying notice appears to be making money. This is NO reason for BLM to issue these very harmful ROWs and enable the expansion of very significant human disturbance activity (noise, that will significantly impact the SRBOPA (which already suffers a great burden from military and other humans disturbances).

This is also highly controversial in the context of all the proposed militarization of southern Idaho taking place right now. This includes potential bedding of noisily loud F-35s, and the MHAFB CAS Urban Warfare Range. Portions of the proposed OTA expansion are located within the Urban CAS area Urban War game 15 NM CAS circle for Mountain Home. All direct indirect and cumulative impacts of all these military proposals on underway (or there that may be contemplated) must be assessed in an EIS. We are greatly concerned that the Guard making money from: other Guard Units, other Military Units like marines or others, or foreign militaries (like Canada), are part of all this that is taking place.

The BLM must require that the Guard reveal how much money it gets for letting others use the OTA. I note that last year, the ID Air Guard had what was akin to an advertisement (it was taken down after we pointed it out online) on its Website urging plane/transients from other bases (or countries) to fuel up in Boise, and train at Idaho's Remote Ranges. It seems Idaho is being sacrificed by the military to fulfill the expansionist goals of some in the Guard. Also, the NEPA analysis must reveal if the Guard will pay to lease state land - and if so, how much.

We are also concerned that a Land Trade proposal may be in the offing. Has the BLM received any inquiries from the Guard/IDL to trade state lands for BLM Lands adjacent or near Mountain Home? Or elsewhere in the surrounding area or southern Idaho? if so, when, what was the proposal? What is the status of the proposal?

One of many Alternatives that must be considered is to examine the adequacy of the existing range if just ID and neighboring states Units trained at Orchard. Another is to incorporate Simulation training with on the ground training. Another is to make more efficient use of the existing range. Another is ALL of the above, or some combination.

We are very concerned about the dust and pollution (including toxics) hazards to people and wildlife, and the

potential for depleted uranium or other carcinogenic and toxic substances from military equipment or activities to be tracked all over the place with this scheme. Also note the close proximity of some of the state lands to the Freeway. Dust clouds may endanger drivers, and will certainly pollute the air of Mountain Home residents.

This proposal will radically expand noise. It will radically expand bright lights/flashes at night with night training - including potential use of White Phosphorus Used in War Crimes and highly flammable and dangerous). The AF's EA that expanded use of white phosphorus to Saylor Creek in Owyhee County stated that this dangerous material was already being used at the OTA. It may involve use of lasers. I

Moreover, once the military gets the ROWS, the vehicles/materials moving across the road and the spectrum of training activities impacting adjacent public lands and wildlife habitats and populations and people - are HIGHLY likely to change. See Attached article by Dahr Jamail on military incrementalism. That sure seems to be what we are seeing take place with this sudden rash of dangerous and very harmful military expansion proposals in ID.

Just in the past 2 years Military Expansion proposals in southern Idaho include:

- The 2016 MHAFFB Convoy EA that allows portions of state Highway 51 and the Bruneau Desert main access road to public lands to be periodically closed for "Convoy Training" and which also made several other changes - including building 6 new Urban CAS sites on JBR as well as one at as No Drop site. The Convoy EA also rejected as controversial an Urban CAS alternative for Boise, Glenns Ferry, and Mountain Home - and never analyzed it. The current MHAFFB DOPAA falsely claims it did. The military is not telling the truth in its the Urban CAS DOPAA.

- The December 2017 proposal to beddown MORE Singapore War Planes at MHAFFB. Interestingly, the Urban CAS DOPAA stated that Urban CAS training at the Owyhee Ranges is 9.5% of the total MHAFFB Training, and the Singapore 2017b Beddown proposal states this will increase remote range use by 14%.

- The 2018 ID Air Guard led F-35 EIS. Despite large-scale ID citizen opposition, and ID being rejected in 2012 for F-35 being and also was NOT chosen for basing of F-35s by the AF Review folks, the ID Air Guard still seeks to impose noisily loud F-35 War Planes on the Boise airport— driving people out of their homes, devaluing property, imposing unhealthy and hearing impairing noise over many area schools, and then the planes will be flying out to the Remote ranges inflicting extreme levels of noise and overflights on top of sage-grouse, bighorn sheep and other wildlife. ALL of the military activity we are discussing here will have serious deleterious impacts on many populations of wildlife in southern ID, as well as public lands recreation.

- The 2018 Urban CAS War Games proposal over 9 Idaho cities. ATTACHED are WLD's initial comments on that proposal - which we ask that you fully incorporate into comments and concerns and ALL issues raised in the comments that are applicable to this current proposal. This involves an unprecedented radical expansion of a military War Game air, ground and training Range over a vast area of southern Idaho, and impact and endanger a million or more people. And again, this State land proposal underlies the Mtn Home Urban CAS flight activity zone.

- There are likely other proposals we don't know about - as we did not receive the additional Singapore beddown info from the military - and instead stumbled across it on-line.

The full direct indirect and cumulative effects of all of these activities - plus the EXISTING Ranges and training taking place on wildlife, people, air quality, quality of life, health, risk of fires, weed spread (including flammable weeds) and all elements of the environment must be fully assessed in an EIS.

I also note that the SRBOPA will be afflicted with the development of an additional high voltage transmission line - Gateway West which will further reduce and fragment habitats, increase fire risk, etc.

Residents of Mountain Home already complain about noise and light flashes from the existing OTA training. This state proposal will be right on their doorstep.

Full baseline studies of ALL environmental conditions- including status of wildlife and other native biota habitats and populations, conditions of roads (width, material, etc.) must be fully examined.

We have many other concerns and will send additional comments.

Thank you,

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738

Begin forwarded message:

From: Katie Fite <katie@wildlandsdefense.org <<mailto:katie@wildlandsdefense.org>> >

Subject: Fwd: IDANG Simco-East Maneuver training Area and ROW EA

Date: September 12, 2017 at 3:01:09 PM MDT

To: alhoffman@blm.gov <<mailto:alhoffman@blm.gov>>

Dear BLM,

Here are comments on the IDANG SRBOPA ROW proposal.

We also sent others yesterday that I will send to you as well.

Katie Fite
WildLands Defense
208-871-5738

Begin forwarded message:

From: Katie Fite <katie@wildlandsdefense.org <<mailto:katie@wildlandsdefense.org>> >

Subject: IDANG Simco-East Maneuver training Area and ROW EA

Date: September 12, 2017 at 1:22:21 PM MDT

To: ng.id.idang.list.ngid-emo@mail.mil <<mailto:ng.id.idang.list.ngid-emo@mail.mil>>

Cc: katie fite <katiemesa@gmail.com <<mailto:katiemesa@gmail.com>> >

Dear IDANG and BLM,

Here are additional concerns related to the Scoping letter. for the Simco-East Maneuver Training Area.

The type of equipment being proposed to tear up the state land has no business being anywhere NEAR a town. The block of state land is VERY close to Mountain Home.

Wikipedia describes the Bradley Fighting Units to be new Mtn Home neighbors ...

The Bradley is equipped with the M242 [M242](https://en.wikipedia.org/wiki/M242) 25 mm [25 mm caliber](https://en.wikipedia.org/wiki/25_mm_caliber) chain gun [as its main weapon](https://en.wikipedia.org/wiki/Chain_gun). The M242 has a single barrel with an integrated dual-feed mechanism and remote feed selection.[1] [The gun has 300 rounds of ammunition in two ready boxes \(one of 70 rounds, the other of 230 rounds\), with an extra 600 rounds in storage \(in the M2 Infantry Fighting Vehicle variant\) or 1200 stowed rounds \(in the M3 Cavalry Fighting Vehicle variant\). The two ready boxes allow a selectable mix of rounds, such as the M791 APDS-T \(Armor-Piercing Discarding Sabot \(with\) Tracer\) and M792 HEI-T \(High Explosive Incendiary \(with\) Tracer\) rounds. The tungsten APDS-T rounds proved highly effective in Desert Storm](https://en.wikipedia.org/wiki/Bradley_Fighting_Vehicle#cite_note-Army_Tech-1) [, being capable of knocking out many Iraqi vehicles, including several kills on T-55](https://en.wikipedia.org/wiki/Desert_Storm) [tanks](https://en.wikipedia.org/wiki/T-55). Even kills against Iraqi T-72 [tanks at close range have been reported](https://en.wikipedia.org/wiki/T-72). [4] [Subsequent ammunition developments resulted in the M919 APFSDS-T \(Armor-Piercing Fin Stabilized Discarding Sabot with Tracer\) round, which contains a finned depleted uranium penetrator similar in concept to armor-piercing munitions used in modern tanks. The M919 was used in combat during the 2003 invasion phase of Operation Iraqi Freedom.](https://en.wikipedia.org/wiki/Bradley_Fighting_Vehicle#cite_note-4)

Secondary[edit https://en.wikipedia.org/w/index.php?title=Bradley_Fighting_Vehicle&action=edit&ion=4]]

It is also armed with an M240C [M240C machine gun](https://en.wikipedia.org/wiki/M240_machine_gun) mounted coaxially [to the M242, with 2,200 rounds of 7.62 mm ammunition](https://en.wikipedia.org/wiki/Coaxial_weapon). For engaging heavier targets (such as when acting in an antitank [fashion](https://en.wikipedia.org/wiki/Antitank)), the Bradley has a TOW missile system [on board, which was changed to fire TOW II missile from the M2A1 model onwards](https://en.wikipedia.org/wiki/BGM-71_TOW). M2 infantry Bradleys also have firing ports for a number of M231 Firing Port Weapons [\(FPWs\)](https://en.wikipedia.org/wiki/M231_Firing_Port_Weapon), providing a means for the occupants to fire from within the vehicle and replacing the top-side gunners on the M113-based Armored Cavalry Assault Vehicles, though the M231 is rarely employed. Initial variants had six ports, but the side ones were plated over with the new armor configuration on the A2 and A3 variants, leaving only the two rear-facing mounts in the loading ramp. No versions of the M3 CFV carry firing port weapons, though early versions had all six firing port mounts fitted and plated over, while newer versions retain the two-ramp mounted firing ports, though again plated over.

Countermeasures[edit https://en.wikipedia.org/w/index.php?title=Bradley_Fighting_Vehicle&action=edit&ion=5]]

The use of aluminum armor and the storage of large quantities of ammunition in the vehicle initially raised questions about its combat survivability. Spaced laminate belts and high-hardness steel skirts have been added to improve the side protection of later versions, although this increases overall weight to 33 tons. In friendly fire incidents in Desert Storm [, many crew members survived hits that resulted in total losses for lighter U.S. Marine Corps](https://en.wikipedia.org/wiki/Gulf_War#Ground_campaign) [LAV-25](https://en.wikipedia.org/wiki/United_States_Marine_Corps) [vehicles](https://en.wikipedia.org/wiki/LAV-25). [citation needed https://en.wikipedia.org/wiki/Wikipedia:Citation_needed]]

All versions are also equipped with two four-barreled smoke grenade [launchers](https://en.wikipedia.org/wiki/Smoke_grenade) [on the front of the turret for creating defensive smoke screens](https://en.wikipedia.org/wiki/Grenade_launcher) [, and can also be loaded with chaff](https://en.wikipedia.org/wiki/Smoke_screen) [and flares](https://en.wikipedia.org/wiki/Chaff_(countermeasure)) [.](https://en.wikipedia.org/wiki/Flare#Military_use)

The article also mentions use of LASERS, which can damage human and animal eyesight. https://en.wikipedia.org/wiki/Bradley_Fighting_Vehicle

PROPOSAL WILL ISOLATE AREA OF SRBOPA

We have looked at BLM mapping of the NCA. LOOK at how the proposal will isolate the land to the north and west of the state land. Pale green appears to be state land. Note very close proximity of Mountain Home, as well. We are very concerned that this will lead to ultimate loss of these lands from the NCA.

OTHER CONCERNS

BLM authorization of the ROW that enables further military sprawl and tearing up new areas of the desert with Bradley fighting vehicles, tanks, and their ilk will NOT fulfill the mission of the NCA "to provide for conservation, protection, and enhancement of raptor populations and habitats and natural and environmental resources and values associated therewith and of the scientific, cultural and educational resources and values of the public lands ...".

We are VERY concerned about claims in the Scoping letter that the public is encroaching on the Guard. The Guard already has a huge area to play War Games in. The Guard has been responsible in the past for fires that burned up large areas of vital habitat in the NCA far outside the boundaries of its huge training range. There Guard uses very hazard substances - including white phosphorus, and blinding devices such as lasers. Military Vehicles may be contaminated with Depleted Uranium or other toxic and/hazardous materials that will pollute the air, land or water. ALL of this should be nowhere near the public, and nowhere near a town.

There is a very reasonable solution to any perceived shooting hazards - as BLM could readily institute a shooting closure within 2 miles of the OTA. we note that IF shooting is claimed to be so dangerous for Guard personnel, then it seems even MORE dangerous for the public traveling Simco Road. with all the military surveillance gadgets now available, it is impossible to understand how the Guard could not control interlopers/shooters.

We are also alarmed at the added disturbance from Apache attack helicopters now regularly flying over a broader area and disturbing and displacing wildlife, and generating noise pollution for yuma residents and property owners. Is this area currently military airspace? Please provide detailed mapping and analysis of all current military airspace and use areas.

We again urge the Guard and BLM to consider a broad range of alternatives, as described in previous comments - REDUCING the OTA area by 14,000 as mitigation for any new area; REDUCING the OTA to better protect the NCA values, conducting the Bradley and tank training elsewhere - as Guard Units and others travel all over anyway, limiting shooting in proximity to the existing OTA, etc.

We also note that the scoping letter refers to the NCA comprising more than 400,000 acres - a big portion of this is the OTA and being torn up by the Guard already.

We urge you to abandon this scheme.

Please keep us fully informed of all that takes place with this.

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701

BLM should not grant the Rights-of-way to the National Guard in the Snake River Birds of Prey National Conservation Area. Native raptors, other wildlife, and rare endemic plants like the ESA-listed Threatened slickspot peppergrass are already under serious stress from habitat damage and loss — and the combined effects of grazing, weeds, fire, military and other disturbance in the SRBOPA.

The Guard proposal will increase Wildlife habitat damage and fragmentation, noise, vehicle deaths and disruption of behavior. This will cause further declines in habitat conditions and animal populations.

The Guard proposal will increase wildfire fire risk and weed expansion in the Birds of Prey landscape.

BLM must conduct current baseline studies of the condition of Wildlife habitats and status of Wildlife populations across the Birds of Prey Area. BLM must then determine how much more, if any, additional disturbance Wildlife can tolerate.

The proposal will also intrude on public lands recreation. It will introduce a new safety hazard on SIMCO Road, where the Guard seeks a Tank Crossing. (Note that Low level Nuclear Waste is hauled on Simco road through the Birds of Prey Area to a disposal site in Owyhee County near the Snake River). There are also many dangerous materials the Guard may be using in training. The impacts of all these materials and also potential contaminants or hazardous material carried on military vehicles must be fully assessed.

An EIS is essential to take a hard and complete look at all direct, indirect and cumulative effects of the Guard proposal on the Birds of Prey Area, wildlife populations, recreation and public health and safety. This must include analysis of adverse effects of other military expansion proposals in Idaho.

BLM must require that the Guard reveal the full amount of non-idaho Unit Guard/Military training that takes place at Orchard, and the amount of any fees the Guard receives for this use. The full impact that of non-idaho use at OTA is having must be fully detailed and assessed.

A full range of Alternatives to the proposal must be considered. These include: Reduce out of state Military use of the OTA. Make more efficient use of the existing 130,000 acre OTA. Do better dust abatement on the lands already torn up. Use more simulations in training. Work with BLM to reduce public “intrusion” on the military. It is absurd that the Guard notes high recreational use of the SRBOPA, blames the public for most of its problems, and now seeks to further worsen public conflicts by its expansion proposal. This is the military, for goodness sake. It can control public intrusion if it wanted to. Any combination of the above alternatives.

The Guard Scoping letter blaming the public for many problems to justify a need for the expansion. The reasons for the expansion are given as :

Safety hazards associated with public shooting; Maneuver training conflicts with the increased about of public use lands; increased destruction of OTA equipment (??? - has someone shot up a sign or something?); and changes in Guard and military mission requirements.

The full terms of a State lease must be provided. Who will be responsible for Clean-up, as most Military Ranges have hazardous contaminants.

Any foreseeable changes to activities must be fully revealed and assessed. For example, will any activity here be related to the Urban CAS War Game Range proposal?

The State lands the Guard seeks to access are right next to the town of Mountain Home, and very close to the Freeway. They are much too close to human habitation and high use areas for Bradley fighting vehicle and other military activity to take place. Some residents of Mountain Home already complain about OTA noise, night light flashes (the Guard uses white phosphorus on the OTA), etc.

BLM must also consider the direct, indirect and cumulative effects of the OTA expansion on wildlife, recreation, public health and safety. This analysis must include assessment of the barrage of Military expansion proposals targeting southern Idaho at present - and their potential impact on local and regional populations of wildlife, public lands recreation, and public health and safety.

BLM must present and analyze the Guard and military mission requirements that are referred to in the OTA Scoping document. Secretary of Defense Mattis was in Mountain Home in January and complained about public intrusion on Military Ranges. Was he referring in part to this? The month following Mattis' visit, the Air Force's Urban CAS War Games Proposal Range over a million Idaho residents was proposed. The State lands are well within the Urban War Games 15 Nautical Mole circle around the town of Mountain Home. Are both these proposals related to the Mattis visit. Is there an immense Military Expansion Plan that all of the current proposals are part of? If so, all foreseeable actions and effects must be analyzed the in the OTA NEPA process.

Much clearer maps that show the Birds of Prey Area, and just what is being proposed, must be provided.

Any other comments you might want to add.

SOUTHERN IDAHO IS THE TARGET OF A HUGE MILITARY TRAINING GRAB

This Army Guard OTA expansion proposal is part of a barrage of militarization schemes proposed across southern Idaho right now. It appears Idaho politicians (Congressional delegation, Otter and Boise Mayor Bieter's lust for basing F-35 War Planes in Boise have opened the floodgates for the military thinking Idaho residents, public lands and wildlife are expendable.

Just in the past 2 years the Military Expansion proposals in southern Idaho include:

- The 2016 MHAFFB Convoy EA that allows portions of state Highway 51 and the Bruneau Desert main access road to public lands to be periodically closed for “Convoy Training”. This also made several other changes - including building 6 new Urban CAS sites on Juniper Butte as well as one at a No Drop site. The Convoy EA also rejected as Controversial an Urban CAS alternative for Boise, Glens Ferry, and Mountain Home - and never analyzed it. The current MHAFFB DOPAA falsely claims it did. The military is not telling the truth in its Urban CAS DOPAA.

- The 2018 ID Air Guard led F-35 EIS. Despite large-scale and growing ID citizen opposition, ID being rejected in 2012 for F-35 basing, and Idaho NOT being chosen for basing of F-35s by the AF Review folks in 20-17, the ID Air Guard still seeks to impose noxiously loud F-35 War Planes on the Boise airport— driving people out of their homes, de-valuing property, imposing unhealthy and hearing impairing noise over many area schools, etc. The F-35s planes will also be flying out to the Remote Owyhee Ranges inflicting extreme levels of noise and overflights on top of sage-grouse, bighorn sheep and other wildlife.

- The 2018 Urban CAS War Game Range proposal over 9 Idaho cities, and a million people. This involves an unprecedented radical expansion of a military War Game air, ground and training Range over a vast area of southern Idaho from Meridian to Burley. It will impact and endanger a million or more people. The OTA State land proposal underlies the Mtn Home Urban CAS flight activity zone.

- The December 2017 proposal to beddown MORE Singapore War Planes at MHAFFB. Interestingly, the Urban CAS DOPAA started that Urban CAS training at the Owyhee Ranges is 9.5% of the total MHAFFB Training, and the Singapore 2017 Beddown proposal states this will increase remote range use by 14%. Is Urban CAS being shifted over Idaho cities to make way for foreign training at existing Ranges?

There are likely other proposals we don't know about - as we did not receive the additional Singapore beddown info - and instead stumbled across it on-line. WHAT ELSE IS IN STORE?

I will be sending additional comments following last night's crowded public meeting in Boise.

The presenters were asked why the Air Force couldn't train at the existing fake building sites - like at Saylor Creek.

The response was the AF needed the chaos of an Urban Environment.

When asked -Why couldn't that be created at Saylor Creek? - the response was that there weren't enough vehicles, and I believe (not recalling the exact words) - cost was alluded to.

Please fully assess the following alternative in the NEPA process you are conducting. Use (and build taller if necessary) fake buildings at the existing Saylor Creek site. Buy vehicles to drive around, and use statistics to create "chaos", randomizing vehicle movement. This can also be combined with some simulation. Please fully compare the fuel and other costs including time efficiency for this action vs. the full and other costs for the Urban War Games you are seeking to impose over the densest population in Idaho.

Moreover, if the AF continues to insist a location is needed - then do this Urban War Gaming at the MHAFB Airspace and immediate surroundings - where people have signed up to be at risk from military activity. Build some tall fake buildings there.

Also, I was dismayed to hear the extent to which the Air Force underplayed very serious public safety concerns - in touting the safety of F-15s. It doesn't matter what type of military plane might be involved in Urban CAS training - there is a very real risk of a crash catastrophe resulting in substantial loss of human life, contamination of waters and public wild lands, and other serious adverse environmental effects.

I am attaching a recent news article on a 2017 A-10 crash 50 miles from Nellis - where two planes collided. They were conducting CAS training. The crash was the result of pilot error.

The Nine Cities Urban CAS War Game training over a population of a million people is also TRAINING - where pilot Urban CAS neophytes will be trained.

Please calculate the likelihood of a civilian fatality from a CAS plane crash over downtown Boise vs. likelihood of a civilian casualty from conducting the same type of training at Saylor Creek. And again, please assess and describe in full detail all of the potential hazardous materials and devices that could harm civilians and contaminate the environment in the event of a Boise Urban War Game CAS crash.

I attended the information meeting about the proposed MHAFB Urban Training last Friday evening in Boise. I am a private citizen, and I am deeply concerned about the AF conducting this type of activity in our communities.

Please add my name to your list of contacts. I would like to stay informed about this and other proposed AF activities that affect our quality of life in the Treasure Valley.

I submit the following questions to be considered in the EA.

1. What is the time period being considered for the urban combat training to be conducted in the Idaho urban centers? When is this project sunset?
2. Will the F-15s produce contrails over Boise and other urban centers? If so, how often, and how many (what is the volume and degree of visual marking)?
3. If civilians walk by or ride by on bikes during training operations, will they see a laser pointing towards them? Will they be recorded in any way (e.g., videotaped)?
4. How will the ground crew react if civilians approach them and ask what they are doing, why they are parked there, etc.?
5. In determining possible noise impacts, will current impacts from airplanes, interstate traffic, etc., be considered as a base impact already?
6. Will the possibility of the F-35s being based at Gowen Field be considered as part of the potential noise and air pollutants?
7. When considering air pollution, will jet fuel exhaust be considered as an impact for residents of Boise?
8. While Boise's particular characteristics of geography and atmospheric conditions be considered on its own as far as impacts go, or will it be swept up in a generalized study of all the urban centers?

I am concerned that my chosen city of residence will be considered a war preparation center. Even more, I object to war preparation activities being conducted in Boise that depend on the premise that enemy combatants are present and a threat to the US.

I would like to receive a copy of the EA once it is released.

I attended the information meeting about the proposed MHAFB Urban Training last Friday evening in Boise. I am a private citizen, and I am deeply concerned about the AF conducting this type of activity in our communities.

Please add my name to your list of contacts. I would like to stay informed about this and other proposed AF activities that affect our quality of life in the Treasure Valley.

I wish to add my questions and concerns to the record regarding the proposed urban warfare training over Boise.

This training is inappropriate for our city. I am concerned about the ground teams driving and parking and moving about in traffic while planes buzz overhead. The busy air traffic during these game would be distracting and alarming. I am concerned about increased air pollution as well.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

Question - So living @ 10,000 feet, what do
I tell buildings here to do w/ it
No No No - First F35 - Now F15 what Next
Military planes are already noisy !!!
Boise City is not a Military base

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

Should like data on maximum # of "sorties"
likely over base

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

I appreciate the scoping meeting
today and ask for another one when
data is collected. At this point I
feel that Boise and surrounding cities
do not need this impact on our
community.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

WINDLANDS DEFENSE
STRONGLY OPPOSES THE
PROPOSAL
IT ENDANGERS TO AND
CITIZENS & IS HAZARDOUS TO
US ALL.
ANEIS MUST BE PREPARED
AND CHANGE OF ALTERNATIVES
MUST BE CONSIDERED. US
SAYLOR CREEK - CREATING
"HADO" WITH VEHICLES
THINGS

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment.

Date: 4/13/18

Name:

Mailing Address:

(Street)

(City, State, Zip)

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

(Agency)

☐ I represent:

(Organization)

Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☐ I would like to make a written comment.

Date: 04/12/18

Name:

Mailing Address:

(City, State, Zip)

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

(Agency)

☐ I represent:

(Organization)

Title:

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COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment.

Date: 4.13.18

Name:

Mailing Address:

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

(Agency)

☐ I represent:

(Organization)

Title:

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COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☐ I would like to make a written comment.

Date: 4.13/18

Name:

Mailing Address:

☐ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

☐ I represent:

(Organization)

Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

Proposed Actions & Alternatives: # 2.4 -
No Active Alternative - ONLY viable alter-
native for the Treasure Valley area. Treasure Valley =
all of Ada County and Western Idaho. CAS operations
are not acceptable in the most populated
area in all of Idaho.
ONLY 2.4 Alternative is acceptable.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

I am concerned about air quality from pollutants -
there is no data available from pollutants from
military flights by F-16s that would be a threat to
the surrounding area for most training.
We do not like our military targeting civilian population
areas. Wait for enemy to leave what would be a tight
combat outside urban areas.
More meetings in different areas of Boise, generally
in the evening 7-9 pm.
We will be number of low many maximum minutes of flight.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

IF THIS URBAN TRAINING AREA IS
ADDED THE PROSPECT OF OTHER
THE FORCE SQUADRON & OTHER SERVICE
BRANCHES WANTING TO COME
HERE CONCERNS ME. THAT IS, I DON'T WANT
BOISE TO BECOME THE DEFacto URBAN
TRAINING AREA FOR THE COUNTRY. AS A
COMBAT VETERAN I UNDERSTAND & SUPPORT
THE NEED TO TRAIN PRIOR TO DEPLOYING

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment.

Date: 4/13/18

Name: Robert Happle

Mailing Address:

☒ I am a private citizen.

(City, State, Zip)

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

(Agency)

☐ I represent:

(Organization)

Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☐ I would like to make a written comment.

Date: 4/13/18

Name: Diann Stone

Mailing Address:

☒ I am a private citizen.

(City, State, Zip)

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

(Agency)

☐ I represent:

(Organization)

Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment.

Date: 4/13/18

Name: Paul Cunningham

Mailing Address:

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

(Agency)

☐ I represent:

(Organization)

Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment.

Date: 4/13/18

Name: Anne Hausgrath

Mailing Address:

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

(Agency)

☐ I represent:

(Organization)

Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

Please hold another well advertised
scoping hearing & include STMC expert

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

PUBLIC INFO/INVOLVEMENT PROCESS IS
WAITING. VERY INADEQUATE NOTICE
OF THESE SCOPING MEETINGS. INCLUD-
ING NOTICE OF CANCELLATION OF PRIOR
SCHEDULED MEETING. 4-6pm on FRIDAY
IS NOT THE TIME TO SEEK PUBLIC
INPUT.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

I do not believe the Air Force has demonstrated
a need for this urban disruption of our fine city.
Many other training options are available and have
been used with success before.
I believe we don't need nor should be
practicing this in cities or really anywhere to promote
urban warfare. Boise is a welcoming city with a
significant refugee population. This proposal must be
very frightening for these people. We also need no more
noise & air pollution in this valley.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

GAUNTA DAS IS MAJOR
ISSUE
ALL TROOPS SHOULD HAVE UNIFORM
AND WRITTEN ORDERS ON THEM
ONLY OFFICIAL USAF VEHICLES
SHOULD BE USED
CIVILIANS ARE ARMED!

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS:

Thank you for holding the public scoping meeting.
I do not support the Urban CAS project
or the Air Force. It does not fit with the livability
goals of Boise. We should not add the
stress of military operation simulation to a
population already stressed by shooter alerts and
other modern day stresses. This truly seems
like just another shiny object the Air Force thinks
it needs, just like the computer wing idea over
20 years ago.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment.

Date: 04/13/18

Name: GARY E. RICHARDSON

Mailing Address:

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

☐ I represent:

Title:

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newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment.

Date: 4/13/18

Name: Tim Yoder

Mailing Address:

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

☐ I represent:

Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules,
newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☐ I would like to make a written comment.

Date: 4/13/18

Name: DAVID R. FRAZIER

Mailing Address:

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

☒ I represent: BOISE GUARDIAN

Title: EDITOR

Public documents associated with this DOPPA, including the draft and final EA, schedules,
newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment.

Date: 4/13/18

Name: Craig Gehlke

Mailing Address:

☒ I am a private citizen.

☐ I am an elected official.

☐ I represent a federal, state, or local agency.

☐ I represent:

Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules,
newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS: I am generally against urban warfare training in Boise. I do not see that the supposed "benefits" in any way even approach the costs to this community.
= Totally against!

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS: I oppose Urban Combat training in the air and on the ground in Boise or the surrounding cities. pay attention to Boise - creates danger for target air city. - The fact there is no end date on this combat training. - Militarization drawing world wide attention to Boise - creates danger for target air city. - Noise pollution - The fact it is not being done anywhere else.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment. Date: 1/1/18
Name: Helen Novik
Mailing Address: [REDACTED]
☒ I am a private citizen.
☐ I am an elected official.
☐ I represent a federal, state, or local agency. (Agency)
☐ I represent: (Organization)
Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment. Date: 4/13/18
Name: Carolyn Fabis
Mailing Address: [REDACTED]
☒ I am a private citizen.
☐ I am an elected official.
☐ I represent a federal, state, or local agency. (Agency)
☐ I represent: (Organization)
Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS: Emergency Response Plan? Will last enhancement be able to use 2nd floor high speed chutes, stairs than lower floor? VRTA case for VI Virtual Reality Train/Helicopter Level 2 Train Room Basic - Advanced. End and VRTA Response. Unmarked/odd kitchen with bars might get people overly paranoid.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment. Date: 4/13/18
Name: Mike Adams
Mailing Address: [REDACTED]
☒ I am a private citizen.
☐ I am an elected official.
☐ I represent a federal, state, or local agency. (Agency)
☐ I represent: (Organization)
Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

SEE ACCOMPANYING DISCLOSURE STATEMENT
DATA REQUIRED BY THE PRIVACY ACT OF 1974
(5 U.S.C. 552A)

COMMENTS: Please stop wasting taxpayer \$ and stop the noise how stupid it is to do this over Boise. We do not want the Air Force here.

COMMENT CARD
Proposed Urban Close Air Support (CAS) Project
Mountain Home AFB
Public Scoping Meeting

☒ I would like to make a written comment. Date: 4/13/18
Name: Roger Rosenthal
Mailing Address: [REDACTED]
☒ I am a private citizen.
☐ I am an elected official.
☐ I represent a federal, state, or local agency. (Agency)
☐ I represent: (Organization)
Title:

Public documents associated with this DOPPA, including the draft and final EA, schedules, newsletters, etc., will be available for review at <http://www.mountainhome.af.mil/Home/Environmental-News/>.

Please put me on the Stakeholder list

Questions submitted at the U.S. AIR FORCE SCOPING MEETING
(4-13-18)

Submitted by: Gwynne McElhinney, M.S., CCC-SLP, Licensed Speech-Language Pathologist

Concerning Training Flights:

- 1) What is the public process for determining if this training should happen or not?
- 2) Why can't virtual reality activities suffice, as they do for so much related training?
- 3) If approved, when would this training for close air support in urban settings begin/end?
- 4) What is the window of time that the Air Force intends to conduct these exercises? (for 6 months in 2018? into 2019? 3-5 years out? for the foreseeable future?)
- 5) How many over-flights per day, per week, per year are planned in each community?
- 6) Will jets fly M-F and/or over weekends? Daytime only or at night, too?
- 7) How will sites be selected/scheduled and will each town have the same # of flights?
- 8) What if Boise proves to be the best site for simulation (due to its size)? Does that mean we will have a disproportionate amount of training exercises conducted here?
- 9) What other states* (where F-15 aircraft are based) have had urban settings used for close air support training such as that proposed for southern Idaho---describe those situations in detail (begun how recently? at what intensity & duration?)
- 10) What problems arose for the civilian populations* affected and how were these issues solved?
- 11) Were residents satisfied with the mitigation efforts?
- 12) Given the known risks to the health and welfare of 500,000 Idahoans living in the proposed mock *combat zone*, what justifies doing this type of training at all? In other words, why (to date) has the Air Force has always flown over unpopulated, wild land training ranges? To avoid harm to humans---that's why!
- 13) Because F-15 air crews have already, safely & successfully conducted military operations in deployed urban situations (using unpopulated ranges for training purposes), then the proposed setting change (to domestic homeland communities) is both unnecessary and dangerous to American citizens.

-----Original Message-----

From: Suzanne Troje [REDACTED]
Sent: Friday, April 13, 2018 2:41 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban CAS EA

Re: Urban CAS

Dear Ms. Noelle Shaver,

I am writing to express my strong opposition to the Mountain Home Air Force base proposal for a permanent F-15 Urban Warfare Close Air Support Training Range across nine Idaho cities including Boise.

From the materials provided, it is not clear what deficiencies have been identified or other evidence provided that current training methods are inadequate. It is also unclear whether simulating the flight itself has been evaluated as an alternative to performing combat operations over densely populated and environmentally sensitive (e.g., birds of prey, sage grouse) areas. What is clear is that the increased number of flights and unidentified military personnel operating on the ground will have serious impacts on our quality of life: we (and our pets and wildlife) will hear war planes day and night; we will be subjected to increased air pollution; we will become suspicious of unidentified military actors driving through our neighborhoods and parking alongside our roads.

The process for vetting this proposal has been less than transparent. For example, it was originally sent only to certain identified stakeholders rather than the public at large; meetings were hastily scheduled, then cancelled, then re-scheduled at times not normally conducive to broad public participation (e.g., 4:00 on a Friday when many people are working).

Let's be clear – Idahoans are not your enemy and should not be treated as such. Please put an end to this proposal now.

Thank you for your consideration.

Sincerely,

Suzanne Troje
[REDACTED]

-----Original Message-----

From: Heather Steele [REDACTED]
Sent: Friday, April 13, 2018 11:25 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] MHAFB URBAN CAS EA

Dear Ms. Shaver,

I am strongly opposed to the proposal to conduct urban military training in the sky above and on the streets of Boise. I object to the hazards of increased air and noise pollution and increased potential for crashes in precisely the areas of the state with the highest density populations. The day and night trainings would significantly impact our quality of life and the peacefulness of our city. The idea of military trainees playing war games in our midst while disguised as civilians is frankly creepy.

I further object to the insufficient public notice given for informational meetings and the ridiculously short window allowed for collection of public comments. These things lead me to believe that the Air Force hopes to quietly approve the trainings without alerting citizens to the plan so that by the time they learn of it, it will be too late. We deserve better.

Sincerely,

Heather Steele
Boise

From: Inna S. [REDACTED]
Sent: Friday, April 13, 2018 10:25 AM
To: ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>
Cc: Katie Fite <katie@wildlandsdefense.org>
Subject: [Non-DoD Source] RE: URBAN CAS over Boise and Idaho

Dear Sheri,

Please log my protest in your public comments against URBAN CAS "initiative" in Idaho.

I am categorically against USAF and MHAFB and any other branch of the military to use OUR CITIES TO PRETEND WE ARE THE BAD GUYS, and YOUR TRAINEES ARE THE GOOD GUYS. WHILE BEING PAID OUT OF OUR TAX MONEY.
This is HIGHLY UNETHICAL.

The chance of an accident while training is rather high, just read about all the recent military airplane crashes in the last year.
With best regards, and hope you take your "initiative" back.

Inna Patrick,
Boise, Idaho.

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Saturday, April 14, 2018 9:17 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>; ROBERTSON, SHERI L CIV USAF ACC 366 CES/CEIE <sheri.robertson@us.af.mil>

Cc: katie fite [REDACTED]

Subject: [Non-DoD Source] MHAFB Urban CAS Nine Cities War Game Proposal

Hello,

I will be sending additional comments following last night's crowded public meeting in Boise.

The presenters were asked why the Air Force couldn't train at the existing fake building sites - like at Saylor Creek.

The response was the AF needed the chaos of an Urban Environment.

When asked -Why couldn't that be created at Saylor Creek? - the response was that there weren't enough vehicles, and I believe (not recalling the exact words) - cost was alluded to.

Please fully assess the following alternative in the NEPA process you are conducting. Use (and build taller if necessary) fake buildings at the existing Saylor Creek site. Buy vehicles to drive around, and use statistics to create "chaos", randomizing vehicle movement. This can also be combined with some simulation. Please fully compare the fuel and other costs including time efficiency for this action vs. the full and other costs for the Urban War Games you are seeking to impose over the densest population in Idaho.

Moreover, if the AF continues to insist a location is needed - then do this Urban War Gaming at the MHAFB Airspace and immediate surroundings - where people have signed up to be at risk from military activity. Build some tall fake buildings there.

Also, I was dismayed to hear the extent to which the Air Force underplayed very serious public safety concerns - in touting the safety of F-15s. It doesn't matter what type of military plane might be involved in Urban CAS training - there is a very real risk of a crash catastrophe resulting in substantial loss of human life, contamination of waters and public wild lands, and other serious adverse environmental effects.

I am attaching a recent news article on a 2017 A-10 crash 50 miles from Nellis - where two planes collided. They were conducting CAS training. The crash was the result of pilot error.

The Nine Cities Urban CAS War Game training over a population of a million people is also TRAINING - where pilot Urban CAS neophytes will be trained.

Please calculate the likelihood of a civilian fatality from a CAS plane crash over downtown Boise vs. likelihood of a civilian casualty from conducting the same type of training at Saylor Creek. And again, please assess and describe in full detail all of the potential hazardous materials and devices that could harm civilians and contaminate the environment in the event of a Boise Urban War Game CAS crash.

Thank you,

Katie Fite
Public Lands Director
Wild Lands Defense
PO Box 125
Boise, ID 83701

-----Original Message-----

From: Kerry Cooke [REDACTED]
Sent: Saturday, April 14, 2018 9:01 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] MHAFB URBAN CAS EA

April 14, 2018

Ms. Noelle Shaver

Re: Urban CAS EA

Ms. Shaver:

I submit the following questions to be considered in the EA.

1. What is the time period being considered for the urban combat training to be conducted in the Idaho urban centers? When is this project sunset?
2. Will the F-15s produce contrails over Boise and other urban centers? If so, how often, and how many (what is the volume and degree of visual marking)?
3. If civilians walk by or ride by on bikes during training operations, will they see a laser pointing towards them? Will they be recorded in any way (e.g., videotaped)?
4. How will the ground crew react if civilians approach them and ask what they are doing, why they are parked there, etc.?
5. In determining possible noise impacts, will current impacts from airplanes, interstate traffic, etc., be considered as a base impact already?
6. Will the possibility of the F-35s being based at Gowen Field be considered as part of the potential noise and air pollutants?
7. When considering air pollution, will jet fuel exhaust be considered as an impact for residents of Boise?
8. While Boise's particular characteristics of geography and atmospheric conditions be considered on its own as far as impacts go, or will it be swept up in a generalized study of all the urban centers?

I am concerned that my chosen city of residence will be considered a war preparation center. Even more, I object to war preparation activities being conducted in Boise that depend on the premise that enemy combatants are present and a threat to the US.

I would like to receive a copy of the EA once it is released.

Thank you.

Kerry Cooke



-----Original Message-----

From: Matthew Kohn [REDACTED]
Sent: Sunday, April 15, 2018 12:05 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [EEMSG-SPAM: Suspect] [Non-DoD Source] MHAFB URBAN CAS EA

Dear Ms Shaver,

I am writing as a private citizen to strongly oppose any efforts to conduct urban military training both overhead and on the streets of Boise. Frankly, I'm shocked anyone would even propose this. Your proposal to have military personnel disguised as civilians really means you're using me (a Boisean) to train spies. I object to being used in this way. And carrying out these games in the densest population in the state dramatically increases noise and danger of accidents.

Last, there was pitifully inadequate notice given for comments. The Air Force is coming across like it's trying to pull a fast one on us. Even if you get your way, you will seriously damage your support here.

Please reconsider,

Matt Kohn
[REDACTED]

-----Original Message-----

From: Ann M Debolt [REDACTED]
Sent: Monday, April 16, 2018 9:44 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] MHAFB URBAN CAS EA

Dear Ms. Shaver:

I attended the information meeting about the proposed MHAFB Urban Training last Friday evening in Boise. I am a private citizen, and I am deeply concerned about the AF conducting this type of activity in our communities.

Please add my name to your list of contacts. I would like to stay informed about this and other proposed AF activities that affect our quality of life in the Treasure Valley.

Sincerely, Ann DeBolt

-----Original Message-----

From: Brent Mathieu [REDACTED]

Sent: Monday, April 16, 2018 3:36 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] Brent of Boise MHAFB URBAN CAS EA Comment

Greetings to all concerned,

Thank you for the Air Force's presentation about F15s, and urban combat training, at the Boise Main Library on April 13. The charts with graphics were a good visual aid. I appreciate all the information presented to our community. I commend the presenters for their engaging presence and knowledge.

It is apparent that Mountain Home Air Force Base is ideal for urban training via F15s. Boise is the nearest major city.

As explained in the presentation, there is definite need for F15 operators to train prior to actual missions.

I do not well understand the need for these missions, and training. Why can not operators/pilots train via simulators to avoid risks inherent over urban air space?

Why would F15s be used in tactical urban combat, where and when there are high population density of civilians? For example, the presentation cited the need to train for pursuit, and assumed attack, on a motor vehicle driving in an urban 'canyon' of tall buildings in traffic.

What scenario justifies engagement when the risk of collateral damage is so high?

I imagine when intelligence has identified a weapon of mass destruction, or an extremely high value human target of a known terrorist or enemy.

The movie, 'Eye in the Sky' portrayed a similar situation.

That said, some concerns, regarding MHAFB and Boise are:

- 1) Potential collisions with civilian aircraft above our city. The risk of crash landings in our city. Depending on F15 speed, and maneuvers, above Boise near the airport and flight paths, there would be increased risk of collision, and extensive civilian casualties and property damage from a crash. Please study how to protect our people and property.
- 2) Please prepare contingency plans and policy to compensate for any loss of human lives and property. I request that these plans be transparent, and publicly presented. Please assure our public that in the event of calamity there would be heart full efforts for compensation, and amends.
- 3) Please fully explore alternate training via simulators.
- 4) Please, advocate at the level of the federal administration's Cabinet, Departments of Defense, State and Office of the President to create a Department of Peace. We, the people, of these United States, and our planet need to make peace our priority over war. Military action needs to be the last resort. This is particularly true in a highly populated urban center. I have seen the photos of the heart breaking destruction of cities such as Aleppo, Syria. The best way to prevent terrorism, and enemy consciousness which foster conflict and war, is to sow seeds of peace. "Blessed are the peace makers".
- 5) An idea to mitigate impact from these training's, if truly necessary, would be to balance by giving MHAFB expanded mission to foster homeland security in Idaho, via collaboration and investment in peace building permaculture science, technology, research and development. For instance, let MHAFB model energy conservation; local secure food sources to feed the base (aquaculture, hydroponics, green houses); alternative energy systems for independent, reliable, non grid based electric power (wind, solar, geothermal, microhydro generators rather than back up diesel generators). This would diversify the economy of the base, and benefit the region nearby. An offer of such positive modeling/show casing would be an olive branch to foster trust between civilians and military personnel.

In conclusion, I trust the Air Force to use due diligence to carefully study and plan for this Urban mission. Thank you for your service to us all.

I was awarded an Air Force ROTC scholarship for pilot training in the early 1970s. I declined the commission. I advocate for peace, not war.

If I can aid further via consultation please contact me.

Blessings, be safe, live well,

Dr Brent B Mathieu, former AFROTC

Son of a veteran of WWII.



-----Original Message-----

From: joanie fauci [redacted]
Sent: Monday, April 16, 2018 9:26 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Cc: Mayor Bieter <mayor@cityofboise.org>; City Council <citycouncil@cityofboise.org>
Subject: [Non-DoD Source] MFHAFB URBAN CAS EA

Dear Sirs,

I attended the Air Force EA Scoping Meeting on the F15 Urban CAS plan on Friday, April 13, 2018. I am a private citizen.

I am not in favor of the Air Force doing Urban Close Air Support in Idaho or in any live situation. I believe simulation technology is good enough for this and every other situation. I also don't even think we should be wasting tax payer money on planes or flights anymore. We have the technology for doing warfare without using people. It is expensive and dangerous to fly planes and use people. The future for the military is all technical, electronic, from afar, using drones and unmanned things. Accidents and mistakes do happen. How can we be assured the bad laser will never be turned on? We can't.

Many people have worked hard to make Boise a great place to live. This proposal puts all that at risk. We cherish our peace and quiet. We will not accept 2 planes at a time, 4 times a day...8 planes each of the flying days. Each time the planes are up, they will be airborne 60-90 minutes. During that time, they may circle around 20 times. Eight planes circling 20 times equals 160 overhead passes, potentially 260 days per year! Even though all those flying days won't be over Boise, it will end our peace and quiet, no matter how high the planes fly. It is unacceptable for our quality of life. Boise is currently a great place to live. It is commonly written up as so. Our economy is booming. We do not need or want overhead military flights.

Other items I have issue with in the current plan are:

1. There is no ending date/time.
2. It should be clearly stated that this is only for Mountain Home personnel, no visiting military crews can use the range.
3. It should be clearly stated that if planes other than the F15 EVER wanted to do something similar they would have to go through the WHOLE process again.
4. Ground vehicles and personnel should be clearly marked.
5. The EA and EIS for the ground plan/crew should be combined with this plan. They are one project! The presenters couldn't commit to anything for the ground team. Where is the NEPA process for that? Surely having them driving through Boise traffic will have an impact.

It was truthfully stated in the meeting that the Air Force had been doing this in the past without having gone through the process. But how can we feel trusting that they won't do similar incorrect things in the future. They couldn't even say if this was happening in any other city. But then they said it had happened in Las Vegas. Something fishy is going on.

I want to be a stakeholder for this and other Mountain Home Air Force issues. Please add me to the list.

Regards,

Joanie Fauci
[redacted]

-----Original Message-----

From: Carol Casler [REDACTED]
Sent: Tuesday, April 17, 2018 7:07 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] MHAFB URBAN CAS EA

Dear Ms. Shaver,

I wish to add my questions and concerns to the record regarding the proposed urban warfare training over Boise.

This training is inappropriate for our city. I am concerned about the ground teams driving and parking and moving about in traffic while planes buzz overhead. The busy air traffic during these game would be distracting and alarming. I am concerned about increased air pollution as well.

Thank you.

Carol Casler, M.Ed., L.P.C.

[REDACTED], LLC

-----Original Message-----

From: Diane Ronayne [REDACTED]
Sent: Tuesday, April 17, 2018 4:31 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] MHAFB URBAN CAS EA

Thank you for this opportunity to comment on the above-referenced EA.

Unfortunately, my schedule did not allow me to attend the EA meeting held in Boise, where I live. However, I received instructions on providing comments when I signed in just before the doors closed. Today I reviewed the 01312018_Urban CAS_Final DOPAA.pdf. Here are my concerns:

1. Safety of the civilian population. Accidents DO happen, and with more than one training operation every day, each involving two to four aircraft and numerous land vehicles, the odds are good that civilians will be injured, especially with the emphasis on night training. Is there redress for that?
2. Noise and air pollution from aircraft.
3. Opportunity for additional non-USAF planes and personnel to use this war-game theater after it is operational. Apparently Singapore trains its military in Idaho. Will other nations come here, too?

Thank you for your attention to these concerns.

Sincerely,
Diane Ronayne
[REDACTED]

-----Original Message-----

From: Anne Hausrath [REDACTED]
Sent: Tuesday, April 17, 2018 2:56 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Cc: Mayor Bieter <mayor@cityofboise.org>; citycouncil@cityofboise.org; Representative Melissa Wintrow <mwintrow@house.idaho.gov>; Cherie Buckner-Webb <cbucknerwebb@yahoo.com>; merpelding@house.idaho.gov
Subject: [Non-DoD Source] Close Air Support and Ground Training proposal--comments to the Air Force

Dear Ms. Shaver:

I attended the open house last Friday, April 13 at the Boise main library. I am grateful to the Air Force for seeking public input on this project. However, it was clear to those of us attending (I found out about the meeting from the e-mail of a friend) that public notice was not adequate.

I ask the Air Force to hold another scoping hearing in Boise with adequate public notice in a larger venue with adequate parking. I feel very strongly that the strength of our democratic republican form of government depends on full public engagement.

I ask that you include representatives from JTAC at the next public hearing so that details of the proposed ground operations can be addressed.

I have several concerns regarding the current CAS proposal:

I am very concerned by the nature of the training. I do not want our city to be the site of "war games". I strenuously object to the presence of "friendly" and "enemy" teams playing hide and seek in our community.

I object to the presence of unmarked vehicles and plain clothes participants; if you are going to use our community for training, we the people need to know who you are. We have been told "See something; Say something". Do you honestly think that we won't be curious, suspicious about teams of strangers stopping beside the roadside day or night? Your proposal seems to blur the line between civilian and military, a move that I consider to be threatening to our very form of government.

I noted what I think are discrepancies between the written proposal and what I understood at the Friday meeting. The proposal states: "Ground-level observers may be positioned on upper floors of buildings to improve visibility." P. 1-2 and " To facilitate aircrew tracking of identified targets, lead JTACs may be positioned in or on buildings in areas that provide broad lines of sight." p. 1-4. Yet I understood from what we were told on Friday that there would be no ground personnel in buildings. I ask that this be clarified and that the written proposal reflect the correct information.

Also, the written proposal states "...In these situations, ground teams (eg., JTACS) mark and designate their positions or CAS target locations visually with an infrared laser pointer." p. 1-3 and "The use of GPS and handheld laser pointers or designators eases the problems associated with night navigation, orientation, and target identification. p 1-3. I believe we were told on Friday that ground personnel would not be using lasers. Again, I request that this issue be clarified. If indeed lasers will be use by ground personnel, we need to be assured by an independent authority that the type of lasers used will pose absolutely no harm to residents. The written proposal should reflect the correct information.

Your proposal implies close coordination with local law enforcement. I ask that you calculate the proposed amount of time required of the Boise Police Department and that if this proposal is implemented that you reimburse the Boise Police Dept. for their time.

With any proposal, it is helpful to learn the experience of other cities that have participated in similar military exercises. I ask that the Air Force release information about similar training exercises which have been conducted anywhere in the U.S.

The project appears to be open ended with no sunset clause. I ask that you impose a limit: two years, three years? and then if the proposal is implemented require review by all stakeholders at the end of the time period.

Thank you for the opportunity to comment. Sincerely, Anne Stites Hausrath [REDACTED]

--

Anne Stites Hausrath
[REDACTED]

Kenneth L. Pidgeon

Urban CAS EA Comments
April 17, 2018

Because the proposed UCAS covers at least 20% of Idaho's population, it would appear a formal EIS is in order due to the possible economic and environmental impacts statewide.

What other urban areas (by name or area), in the United States or other countries, are used, or have been used, for UCAS training by any USAF or Air National Guard organization?

If other areas already exist, why cannot those existing areas be used in lieu of Idaho areas?

What Air Force doctrine(s) requires this training be conducted in a real urban area (as opposed to a military training area)?

With whom, or what organization, did this proposal for UCAS in Idaho originate from either inside the USAF organization or outside of it?

Why cannot simulators be used for UCAS training?

What State, County, or Local elected officials have you communicated with (verbally or in writing) regarding this proposal and what were their comments about it - either individually or collectively?

When were these contacts with State, County, or Local elected officials made (time frame such as July 2017 through February 2018)?

Why was only one scoping meeting (rather than two or more) held for Boise, Idaho (the largest city in the State)?

It is my understanding this proposal was withdrawn in the last year or so because it was considered "too controversial". What has changed with this proposal?

Will the FAA have to approve this proposal and / or issue restricted air space boundaries or military operating area boundaries?

How will you coordinate UCAS training with local airports and the restricted airspace at the Orchard Combat Training Center southeast of Boise?

The time frame for submitting written comments after the scoping meetings are over is less than 30 days (actually less than 2 working days after the Boise scoping meeting). Please explain why the comment period following the last scoping is less than 30 days and please explain why it could not have been at least a 30 day comment period.

-----Original Message-----

From: Dale Reynolds [REDACTED]
Sent: Tuesday, April 17, 2018 7:25 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] URBAN CAS EA

RE: Proposed Urban Close Air Support (CAS) Project.

Name: Dale Reynolds
[REDACTED]

I am a private citizen, live in Boise, and will be directly affected by this proposed project. I support the AFB but do not understand why our city needs to be part of this urban training. Our city is growing, we are getting more traffic and congestion. We do not need more air traffic and disturbance from urban training. The AFB has many training ranges and simulators where this training can be conducted without disrupting the citizens of Boise. I have lived in Boise for 54 years and like many others, enjoy the quality of life that Boise provides. Please find an alternative location or simulation for this urban training and do not bring this to Boise.

Thanks, Dale Reynolds

-----Original Message-----

From: Lee Moll [REDACTED]
Sent: Friday, May 11, 2018 11:54 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 CES/CEIE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] MHAFB URBAN CAS EA

I am concerned that the MHAFB URBAN CAS project will affect the quality of life in Boise and other urban centers in Idaho. Boise will no longer be one of the best places to live in the nation. This will have economic affects as well, as some people may leave because of it. Others, who may have moved/visited here, will not.

Besides being able to hear and see many planes, many days of the year, without prior notice, I am concerned about the affects on the environment, wildlife, pets, and humans (those with PTSD, etc.). There is also the issue with the lasers and how they may affect a living organism.

While I appreciate that the pilots, and others, want to improve their skills, it doesn't seem necessary to disturb whole communities for an unlimited amount of time in order to do so. The MHAFB has already conducted fly-over missions (2010-2014) without any environmental assessment or public notification. How will we trust them to comply with an Environmental Impact Statement?

Finally, I am fundamentally opposed to war and resent that our peaceful city, and my tax dollars, would be used to further the purposes of war. I would not be proud about this occurring in Boise, Idaho.

Thank you for doing the Environmental Assessment and I hope that you will find cause to continue with an Environmental Impact Statement.

Lee Moll
[REDACTED]

Appendix A: Draft EA Public Comment Period

Example General Public Draft EA Letter



**DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 366TH FIGHTER WING (ACC)
MOUNTAIN HOME AIR FORCE BASE IDAHO**

September 14, 2018

MEMORANDUM FOR: MR. MICHAEL COURTNEY, TWIN FALLS DISTRICT MANAGER, BUREAU
OF LAND MANAGEMENT

FROM: 366 A6 7/A7IE
1030 Liberator Street
Mountain Home AFB ID 83648

SUBJECT: Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support
(CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho

In accordance with the National Environmental Policy Act and its implementing regulations, the United States Air Force (USAF) and the 366th Fighter Wing has developed an Environmental Assessment (EA) to evaluate proposed establishment of air and ground training spaces in urban centers located near Mountain Home Air Force Base (AFB) to support Urban Close Air Support (CAS) proficiency training for F-15E aircrews. Training in urban centers is needed because these areas provide an environment with the same tactical challenges encountered during deployment. Nine urban centers have been identified for this training: Boise, Mountain Home, Burley, Twin Falls, Grandview, Glenns Ferry, Bruneau, Hammett, and Mountain Home AFB. The purpose of this letter is to inform you that the Draft EA is available for public review and comment starting September 14, 2018 through October 14, 2018.

The proposed training would be limited to coordinated flight and ground tracking of simulated targets in the urban centers. Mountain Home AFB originally proposed 260 training events (involving 650 training operations) in the January 2018 Description of the Proposed Action and Alternatives. However, Mountain Home AFB decided to reduce the proposed number of operations by approximately 40 percent following coordination with the stakeholders and public communities during scoping efforts. Under the updated Proposed Action, a maximum of 160 Urban CAS proficiency training events (involving 400 training operations) would be expected to be conducted across all identified urban centers annually. The Draft EA demonstrates that the updated Proposed Action and the No Action Alternative would not significantly impact the environment. Based on this analysis, the USAF has prepared a Draft Finding of No Significant Impact (FONSI).

If you have any questions, or require additional information, please contact Ms. Noelle Shaver at noelle.shaver@us.af.mil or A6 7/A7IE, 1030 Liberator Street, Mountain Home AFB 83648.

Respectfully

A handwritten signature in black ink, appearing to read "Sheri L. Robertson", is written over a printed name and title.

SHERI L. ROBERTSON
Chief, Environmental Management

Attachments:

1. Draft Environmental Assessment and Finding of No Significant Impact for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, September 2018.
2. Draft Finding of No Significant Impact for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, September 2018.

Library Public Draft EA Letter



9781 S Meridian Blvd, Suite 400,
Vienna, VA 22180-7306
(303) 754-4200

Dear Sir or Madam:

Included with this letter is a hardcopy of the *Draft Environmental Assessment the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho* and the Draft Finding of No Significant Impact for the project. Both of these files are also included on the enclosed Compact Disc (CD). Please place a copy of all materials and the CD either on reserve or in the reference section of your library. Members of the public have been invited to review the document at your library from **September 14, 2018 until October 14, 2018**. The document should not leave the library. A copy of the newspaper advertisement announcing availability of this document for review is included with this letter.

If you have any questions, please contact me at: (410) 610-1002 or deborah.peer@hdrinc.com. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deborah Peer'.

Deborah Peer
Project Manager, HDR

Attachment: Notice of Availability

**NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT
DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR
THE ESTABLISHMENT OF URBAN CLOSE AIR SUPPORT (CAS)
AIR AND GROUND TRAINING SPACES NEAR MOUNTAIN HOME AIR FORCE BASE, IDAHO**

A Draft Environmental Assessment (EA) has been prepared to analyze the impacts of the establishment of ground and airspace training areas in urban centers near Mountain Home Air Force Base (AFB) to accommodate Urban CAS proficiency training operations by F-15E and F-15SG aircrews of the 366th Fighter Wing with ground support from Joint Terminal Attack Controllers (JTACs). The purpose of the Proposed Action is ensure F-15E and F-15SG aircrews can conduct Urban CAS proficiency training to identify, track, and perform in-air laser designation of targets within the full range of urban ground and airspace environments with ground support from JTACs. The Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirement. To be adequately prepared for combat, increase the survivability of air and ground teams (i.e., JTACs), and avoid collateral damage to civilians, aircrews and JTACs must train fully and intensively together in urban settings that realistically simulate the urban environments encountered in combat.

USAF proposes to: 1) establish air and ground training spaces for F-15E and F-15SG aircrews in Boise, Burley, Mountain Home, Twin Falls, Bruneau, Glenns Ferry, Grand View, Mountain Home AFB, and Hammett, and 2) establish an Urban CAS aircrew proficiency training regime in those urban centers. The Proposed Action would distribute existing aircraft operations among Mountain Home AFB's ranges and airspaces and the air and ground spaces at the urban centers. Mountain Home AFB decided to reduce the proposed number of operations by approximately 40 percent following coordination with the stakeholders and public communities during scoping efforts. Under the updated Proposed Action, a surge level of 160 Urban CAS proficiency training events (involving 400 training operations) could be conducted across all identified urban centers annually.

The Draft EA, prepared in accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations, and Air Force instructions for implementing NEPA, evaluates potential impacts of the Proposed Action and Action Alternative on the environment, as well as a No Action Alternative. Based on the analyses, the USAF anticipates preparing a Finding of No Significant Impact (FONSI). The Draft EA and proposed Draft FONSI are available for review at the following locations:

Boise Public Library 715 S. Capitol Blvd. Boise, ID 83702	Bruneau District Library 32073 Ruth St, Bruneau, ID 83604	Glenns Ferry Public Library 298 S Lincoln St, Glenns Ferry, ID 83623	Eastern Owyhee County Public Library 520 Boise Ave Grand View, ID 83624
Mountain Home AFB Library 485 15 th Ave Mountain Home AFB, ID 83648	Mountain Home Public Library 790 N. 10 th E. St. Mountain Home, ID 83647	Twin Falls Public Library 201 4th Ave E Twin Falls, ID 83301	

Online at: <http://www.mountainhome.af.mil/Home/Environmental-News>

The document is available for public review and comment from September 14, 2018 through October 14, 2018. Please address written comments to Ms. Noelle Shaver at noelle.shaver@us.af.mil, or by postal mail at: Noelle Shaver, 366 A6 7/A7IE, 1030 Liberator, Mountain Home, ID 83648

PRIVACY ADVISORY NOTICE

Comments on this document are requested. Letters or other written comments provided may be published in the Final EA. Any personal information provided will be used only to identify a desire to make a statement during the public comment period or to fulfill requests for copies of the Final EA or associated documents. Private addresses will be compiled to develop a mailing list for those requesting copies of the Final EA; however, only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and telephone numbers will not be published in the Final EA.

Notification of Library Receipt of the Public Draft EA

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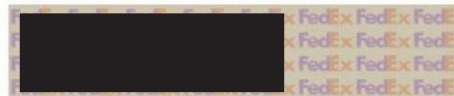


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Abbey Humphreys-Rowe
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[571 327-5861](tel:5713275861)

TO
Boise Public Library
BOISE, ID US 83702
[571 327-5861](tel:5713275861)

773201489686 

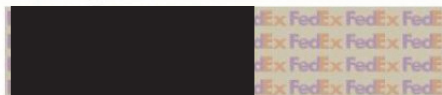


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[571 327-5861](tel:5713275861)

TO
Bruneau District Library
BRUNEAU, ID US 83604
[571 327-5861](tel:5713275861)

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[571 327-5861](tel:5713275861)

TO

Eastern Owyhee County Public Librar
GRAND VIEW, ID US 83624
[571 327-5861](tel:5713275861)

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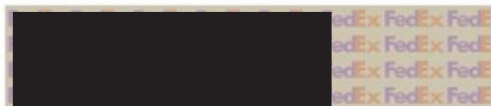


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Friday 9/14/2018 at 11:00 am



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Signed for by: J.BUNDERSON



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HDR
Abbey Humphreys-Rowe
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SUITE 400
VIENNA, VA US 22180
[571 327-5861](tel:5713275861)

TO

Glenns Ferry Public Library
GLENN'S FERRY, ID US 83623
[571 327-5861](tel:5713275861)

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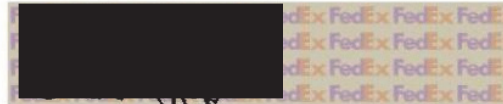


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Friday 9/14/2018 at 12:00 pm



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Signed for by: L.URFER



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HDR
Abbey Humphreys-Rowe
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SUITE 400
VIENNA, VA US 22180
[571 327-5861](tel:5713275861)

TO

Mountain Home Air Force Base Librar
MOUNTAIN HOME A F B, ID US 83648
[571 327-5861](tel:5713275861)

773206549600 

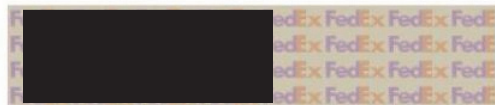


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Signed for by: M.BOOTH



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HDR
Abbey Humphreys-Rowe
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SUITE 400
VIENNA, VA US 22180
[571 327-5861](tel:5713275861)

TO

Mountain Home Public Library
MOUNTAIN HOME, ID US 83647
[571 327-5861](tel:5713275861)

773206508908 

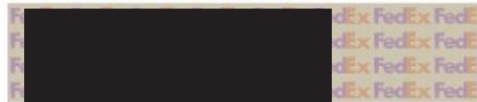


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Signed for by: C.JEFFRIES



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HDR
Abbey Humphreys-Rowe
2650 PARK TOWER DRIVE
SUITE 400
VIENNA, VA US 22180
[571 327-5861](tel:5713275861)

TO

Twin Falls Public Library
TWIN FALLS, ID US 83301
[571 327-5861](tel:5713275861)

Public Draft EA Notice of Availability Tear Sheets from Idaho Statesman and Mountain Home News

In Washington, Federal Emergency Management Agency chief Brock Long, a North Carolina native who rode out Hugo as a child at home, warned that Florence could be the worst in Carolina history.

"Storm surge is why many of you have been placed under evacuation and we're asking citizens to please heed a warning," he said.

U.S. Immigration and Customs Enforcement vowed not to detain or arrest immigrants fleeing the storm. "Our highest priority remains preservation of life and safety," spokesman Bryan Cox.

In the days leading up to the storm, forecasters warned that the Carolinas and parts of Virginia could get hammered by a powerful hurricane driving ashore dangerous surges. On Tuesday sustained winds climbed to Cat 4 strength of 140 mph as the storm churned west. Winds began to weaken Wednesday, but the storm also broadened, widening its dangerous reach.

Numerous rivers along the Carolina coast, including the Neus and Pamlico that empty near the

slammed South Carolina as a Cat 4 storm with a 20-foot storm surge.

"If you're going to leave," South Carolina Gov. Henry McMaster said Thursday, "you should leave now because time is running out."

Some heeded the warning. "I remember doing this a lot as a little kid," Joel Sullivan, 30, said as he walked near the pier on Atlantic Beach with his three children for one last look at the arriving storm. "I just wanted them to see the power of the waves and everything."

Sullivan planned to evacuate later Thursday to Goldsboro with his 7-year-old twins and a 5-year-old.

Others defiantly planned on staying put.

"I was born and raised here," Gary Hamm said as he tried to feed money into a Wilmington ice machine before giving up and heading home empty-handed. "I ain't going nowhere."

Duke Energy, the region's largest electric supplier, estimated that 75 percent of its customers, or 3 million, could lose power. Thursday evening, thousands were already in

South Carolina and Virginia, with one near the Cape Fear river in North Carolina plagued by repeated cracks. After Hurricane Matthew, the flooded Neuse River washed coal ash from the Lee Power Plant near Goldsboro. North Car-

South Carolina, The State in Columbia, the Beaufort Gazette, The Island Packet in Hilton Head and The Sun News in Myrtle Beach; and supplemented with wire service reports.

Follow Jenny Stalevitch on Twitter @jensstalevitch

done by the Democrats in order to make me look as bad as possible when I was successfully raising Billions of Dollars to help rebuild Puerto Rico."

Puerto Rico's governor last month raised Maria's official death toll from 64 to 2,975 after an inde-

School of Public Health at George Washington University. The study said the original estimates were so low because doctors on the island had not been trained to properly classify deaths after a natural disaster.

NOTICE OF AVAILABILITY DRAFT ENVIRONMENTAL ASSESSMENT DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR THE ESTABLISHMENT OF URBAN CLOSE AIR SUPPORT (CAS) AIR AND GROUND TRAINING SPACES NEAR MOUNTAIN HOME AIR FORCE BASE, IDAHO

A Draft Environmental Assessment (EA) has been prepared to analyze the impacts of the establishment of ground and airspace training areas in urban centers near Mountain Home Air Force Base (AFB) to accommodate Urban CAS proficiency training operations by F-15E and F-15SG aircrews of the 366th Fighter Wing with ground support from Joint Terminal Attack Controllers (JTACs). The purpose of the Proposed Action is ensure F-15E and F-15SG aircrews can conduct Urban CAS proficiency training to identify, track, and perform in-air laser designation of targets within the full range of urban ground and airspace environments with ground support from JTACs. The Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirement. To be adequately prepared for combat, increase the survivability of air and ground teams (i.e., JTACs), and avoid collateral damage to civilians, aircrews and JTACs must train fully and intensively together in urban settings that realistically simulate the urban environments encountered in combat.

USAF proposes to: 1) establish air and ground training spaces for F-15E and F-15SG aircrews in Boise, Burley, Mountain Home, Twin Falls, Bruneau, Glens Ferry, Grand View, Mountain Home AFB, and Hammett, and 2) establish an Urban CAS aircrew proficiency training regime in those urban centers. The Proposed Action would distribute existing aircraft operations among Mountain Home AFB's ranges and airspaces and the air and ground spaces at the urban centers. Mountain Home AFB decided to reduce the proposed number of operations by approximately 40 percent following coordination with the stakeholders and public communities during scoping efforts. Under the updated Proposed Action, a surge level of 160 Urban CAS proficiency training events (involving 400 training operations) could be conducted across all identified urban centers annually.

The Draft EA, prepared in accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations, and Air Force instructions for implementing NEPA, evaluates potential impacts of the Proposed Action and Action Alternative on the environment, as well as a No Action Alternative. Based on the analyses, the USAF anticipates preparing a Finding of No Significant Impact (FONSI). The Draft EA and proposed Draft FONSI are available for review at the following locations:

Boise Public Library 715 S. Capitol Blvd. Boise, ID 83702	Bruneau District Library 3207 3 Ruth St. Bruneau, ID 83604	Glenns Ferry Public Library 298 S Lincoln St. Glenns Ferry, ID 83623	Eastern Owyhee County Public Library 520 Boise Ave Grand View, ID 83624
Mountain Home AFB Library 485 15 th Ave Mountain Home AFB, ID 83648	Mountain Home Public Library 790 N. 10 th E. St. Mountain Home, ID 83647	Twin Falls Public Library 201 4 th Ave E Twin Falls, ID 83301	

Online at: <http://www.mountainhome.af.mil/Home/Environmental-News>

The document is available for public review and comment from September 14, 2018 through October 14, 2018. Please address written comments to Ms. Noelle Shaver at noelle.shaver@us.af.mil, or by postal mail at: Noelle Shaver, 366 A6 7/A7IE, 1030 Liberator, Mountain Home, ID 83648

PRIVACY ADVISORY NOTICE

Comments on this document are requested. Letters or other written comments provided may be published in the Final EA. Any personal information provided will be used only to identify a desire to make a statement during the public comment period or to fulfill requests for copies of the Final EA or associated documents. Private addresses will be compiled to develop a mailing list for those requesting copies of the Final EA; however, only the names of the individuals making comments and specific comments will be disclosed. Personal home addresses and telephone numbers will not be published in the Final EA.

FEMA administrator under investigation

BY JULIE HIRSCHFELD DAVIS
AND RON NIXON
New York Times

WASHINGTON

Brock Long, the administrator of the Federal Emergency Management Agency, who is overseeing the federal response to a potentially catastrophic hurricane beginning to lash the East Coast, acknowledged on Thursday that he is under investigation for unethical conduct at the agency, but denied any intentional wrongdoing.

The inspector general at the Department of Homeland Security is investigating whether Long improperly used agency vehicles to commute from Washington to North Carolina, where his family resides, according to a report by Politico. The

revelation forced Long to undertake a measure of personal damage control just as he is leading a high-stakes emergency effort.

"I would never intentionally run a program incorrectly," Long said in an unscheduled appearance during a briefing with reporters on Thursday morning about Hurricane Florence, a Category 2 storm that was growing in size as it approached North Carolina. "Doing something unethical is not in my DNA."

Long added: "We'll fully cooperate with any investigation that goes on, own up to any mistakes and move on. But right now we're going to get to Florence and move forward and concentrate on lifesaving issues."

**NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT
DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR
THE ESTABLISHMENT OF URBAN CLOSE AIR SUPPORT (CAS)
AIR AND GROUND TRAINING SPACES NEAR MOUNTAIN HOME AIR FORCE BASE, IDAHO**

A Draft Environmental Assessment (EA) has been prepared to analyze the impacts of the establishment of ground and airspace training areas in urban centers near Mountain Home Air Force Base (AFB) to accommodate Urban CAS proficiency training operations by F-15E and F-15SG aircrews of the 366th Fighter Wing with ground support from Joint Terminal Attack Controllers (JTACs). The purpose of the Proposed Action is ensure F-15E and F-15SG aircrews can conduct Urban CAS proficiency training to identify, track, and perform in-air laser designation of targets within the full range of urban ground and airspace environments with ground support from JTACs. The Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency training requirement. To be adequately prepared for combat, increase the survivability of air and ground teams (i.e., JTACs), and avoid collateral damage to civilians, aircrews and JTACs must train fully and intensively together in urban settings that realistically simulate the urban environments encountered in combat.

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Online at: <http://www.mountainhome.af.mil/Home/Environmental-News>

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Extended Comment Period Notification

From: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE

Sent: Tuesday, September 25, 2018 10:04 AM

[illegible]

Cc: 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>

Subject: RE: Notice of Comment Period Extension for the Urban Close Air Support [CAS] Environmental Assessment

Dear Stakeholder,

This email is to provide notification that the public comment period for the Draft Urban CAS EA has been extended from 14 October, 2018 to 20 October, 2018. Please see the links below for copies of the draft EA and draft FONSI.

Sincerely,
Noelle Shaver

From: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE

Sent: Friday, September 14, 2018 12:38 PM

To: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Subject: Notice of Availability of the Urban Close Air Support [CAS] Environmental Assessment

Dear Stakeholder,

Mountain Home AFB is providing Notice of Availability (NOA) for the Draft Environmental Assessment (EA) for the proposed Establishment of Urban Close Air Support (CAS) and Ground Training Spaces near Mountain Home Air Force Base, Idaho. The document is available for public review and comment beginning September 14, 2018 through October 14, 2018.

Below is the link for the web page on which the EA is contained:
<https://www.mountainhome.af.mil/Home/Environmental-News/>

The direct link for the draft EA, including the draft Finding of No Significant Impact (FONSI):
[https://www.mountainhome.af.mil/Portals/102/Documents/environmental/Urban%20CAS%20EA%20Vol%20I%20\(aft%20FONSI\).PDF?ver=2018-09-14-115606-390](https://www.mountainhome.af.mil/Portals/102/Documents/environmental/Urban%20CAS%20EA%20Vol%20I%20(aft%20FONSI).PDF?ver=2018-09-14-115606-390)

Respectfully,

Noelle Shaver
EIAP/Cultural Resources Programs Manager
366 A6 7/A7IE
1030 Liberator St.
Mountain Home AFB 83648

PAO Notification of the Draft EA Public Comment Period Extension

From: 366 FW/PA Public Affairs

Sent: Tuesday, October 2, 2018 11:44 AM

To: RSykes@mountain-home.us; mayor@cityofboise.org; bbrackett@senate.idaho.gov; CITY OF GLENNS FERRY <mayorgf@rtci.net>; sbarigar@tfid.org; mayornorm@grandview.wa.us; bbrackett@senate.idaho.gov; czito@house.idaho.gov; mblanksma@house.idaho.gov; cbucknerwebb@senate.idaho.gov; merpelding@house.idaho.gov; mwintrow@house.idaho.gov; heider@senate.idaho.gov; lcrow@house.idaho.gov; shartgen@house.idaho.gov

Cc: Shoni Pegram <Shoni.Pegram@gov.idaho.gov>; Stegner, Peter (Crapo) <Peter_Stegner@crapo.senate.gov>; Linehan, Solara <Solara.Linehan@mail.house.gov>; zach_forester@sbc.senate.gov; Mathews, Mike (Risch) <Mike_Mathews@Risch.senate.gov>; Billy.Valderrama@mail.house.gov

Subject: Urban Close Air Support - public comment period extension

Attached is the press release regarding Urban Close Air Support Public Comment Period. Please feel free to let us know if you have any questions.

Urban Close Air Support Comment Period Extended

MOUNTAIN HOME AIR FORCE BASE, Idaho - The 366 Fighter Wing's draft Urban Close Air Support (CAS) Environmental Assessment public comment period has been extended from October 14, 2018 to October 20, 2018. Public comments submitted by phone, mail, or email will be included in the public record and addressed in the final EA.

Public comments can be provided by email to the Public Affairs office at 366FW.PA.Public.Affairs@us.af.mil. For comments by telephone, please contact the Public Affairs office at (208) 828-6800.

The draft environmental assessment is available at [https://www.mountainhome.af.mil/Portals/102/Documents/environmental/Urban%20CAS%20%20EA%20Vol%20I%20\(aft%20FONSI\).PDF?ver=2018-09-14-115606-390](https://www.mountainhome.af.mil/Portals/102/Documents/environmental/Urban%20CAS%20%20EA%20Vol%20I%20(aft%20FONSI).PDF?ver=2018-09-14-115606-390) and the appendices is located at https://www.mountainhome.af.mil/Portals/102/Documents/environmental/Urban%20CAS%20Draft%20EA_Vol%20II_A%20appendices.pdf?ver=2018-09-20-131619-780.

Very Respectfully,
Mountain Home Air Force Base, Public Affairs Office
(208) 828-6800

Public Draft EA Comment Resolution Matrix

<p style="text-align: center;">Comment Response Matrix</p> <p style="text-align: center;">Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments</p>					
#	Commenter		Comment	Reviewer	Response
	Name	Agency			
1	K. Fite	Public	Request for JTAC at scoping meeting.	S. Robertson	Thank you for your comment.
2	K. Fite	Public	Increase of JTAC activity in Draft EA	S. Robertson	Thank you for your comment. Joint Terminal Attack Controller (JTAC) activity was proportionately reduced with the reduced numbers of flight training operations to support 160 training events per year. The JTAC operational parameters would be as described in Sections 2.1 through 2.1.6 of the EA
3	K. Fite	Public	EA information on airspace and airspace use is confusing.	S. Robertson	Thank you for your comment.
4	K. Fite	Public	It is also an enigma why such an unprecedented militarization of civilian spaces across southern Idaho is really required - given that Nellis and other military bases perform Urban CAS training quite proficiently at military withdrawn lands and special sites that do not endanger a large civilian population. This is especially the case given the increased use of simulated activity in training. Certainly a combination of building some tall building shells at Mountain Home AFB and/or Saylor Creek, coupled with simulations must be carefully assessed in this process.	S. Robertson	Thank you for your comment. Section 1.3 describes the real world challenges of conducting Urban CAS in combat. As explained in Section 1.5 , the purpose and need for the Proposed Action is multifaceted, and includes: aircrew proficiency training, communication and coordination with ground support, gaining practical experience in identifying, tracking, and conducting in-air laser designation of identified targets. Section 2.2 for the selection standards and analysis of reasonable alternatives for achieving the purpose and need of this required training.
5	K. Fite	Public	The comments I for WLD submitted asked many questions about a Department of Defense Instruction Memo and many other matters that have not been adequately addressed in the EA.	S. Robertson	Thank you for your comment. Department of Defense Instruction (DODI) 1322.28, <i>Realistic Military Training off Federal Property</i> , requires ground support teams to operate in accordance with (IAW) local,

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
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					state, and federal regulations. The DODI establishes procedures for coordinating with local law enforcement. Local law enforcement are not expected to expend additional time on coordination.
6	K. Fite	Public	Why can't a meeting be scheduled? The Mountain Home AFB headed by a Base Commander proposes to significantly intrude on the lives and wellbeing of nearly a million people across southern Idaho with this unprecedented War Games scheme — and the Commander won't meet with the public and hear their concerns first hand?	S. Robertson	Thank you for your comment. Stakeholder communications and notice of the public scoping meetings was carried out in accordance with NEPA, 40 CFR 1506.6, <i>Public Involvement</i> . Public involvement, including scoping and outreach efforts, are described in Section 1.7 of the EA. Scoping comments were requested through mailings sent to vested stakeholders identified early in the project planning phase - including local, state, and federal governments, planning entities, tribes, and non-government organizations. Additionally, Mountain Home AFB publicly announced and conducted eight public meetings across the defined project area with a town hall format that to enable community members who were in attendance to raise concerns and engage in discussion about the proposed training. The wing commander designated military members to represent the installation. Mountain Home AFB accepted and considered public scoping comments in the development of the DOPAA for several months (instead of the typical 30-days), which defined the Proposed Action.
7	K. Fite	Public	Is the Base Commander still a Mr. Kunkel - who appears to have only been in Idaho since Sept. 2017? Perhaps not long enough to understand that many folks here very much value their privacy, peace and quiet.	S. Robertson	Thank you for your comment. Colonel Kunkel is the current Wing Commander of Mountain Home AFB.

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
8	D. Ferguson	Public	I object and disagree with the FONSI on the Draft EA for Urban CAS Air and Ground Training Spaces, Mountain Home AFB. Simulating war games in a large urban center such as Boise would have significant impact on the people who live and work in the community, as well as visitors. It would have a negative impact on our large veteran population, many who suffer from PTSD, as well as out significant refugee population who have escaped their own war torn countries. The noise and distraction would also negatively impact schools, universities, businesses, and conventions in Boise. Moreover, the analysis of the impact on wild life is woefully inadequate, in this important urban wildlife interface. The FONSI should be pulled and a draft EIS initiated for all of these reasons and more	S. Robertson	<p>Thank you for your comment. Noise is modeled using NOISEMAP, a suite of computer programs and components to predict noise exposure due to aircraft operations. Air Force Instruction (AFI) 32-7063, Air Installations Compatible Use Zones Program, provide land use guidelines for noise exposure. Operational parameters used in the analysis conservatively assumed all operations would occur at each urban center. Additionally, the analysis used thresholds more conservative than the American National Standard Institute for determining impacts on noise sensitive receptors. The impacts from the proposed flight training operations would be less than significant.</p> <p>Additionally, under the Proposed Action, Urban CAS flight activities may be conducted at any one of the urban centers identified as adequate to support the aircrew proficiency training. Thus, flight operations would not be concentrated over any one urban center. Additionally, as explained in the response to Comment 16, the 366 Fighter Wing Range Operations would monitor training for compliance with the EA. The information can be obtained by contacting the Mountain Home AFB Public Affairs Office (208-828-6800).</p>
9	J. Zuckert	Public	This proposal requires an Environmental Impact Statement. It will	S. Robertson	Thank you for your comment. Please see

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
			have major negative sound impacts and potential negative health and safety impacts on over half a million residents of southwestern Idaho that must be more thoroughly evaluated. Opportunities for scoping, for understanding the details of the proposal, and for providing comments must be widely publicized in advance and provided throughout the area of impact.		response to Comment 8 .
10	J. Zuckert	Public	Noise levels will be high and disturbing. The draft EA describes noise impacts as "overflights will not interfere with communications or awaken individuals from sleep." However, Table 3-5 shows maximum sound levels for F15-E overflights at 70.8 decibels. Table 3-6 shows maximum sound levels for F-15SG overflights as 72.3 decibels. Table 3-1 describes common sounds like a vacuum cleaner indoors at 10 feet with a 70 decibel noise level, and heavy traffic outside at 150 feet also at 70 decibels. Because the decibel scale is logarithmic, 70.8 and 72.3 are a lot louder than 70. But even at 70 decibels, how could anybody possibly sleep with the loud sounds the volume of a running vacuum cleaner suddenly and perhaps repeatedly audible in your bedroom? How could people go about their normal lives outdoors - walking, talking, playing, eating - with these new sounds resembling close by heavy traffic? Most of the proposed operating areas are now very quiet. Even in the urban metropolitan area of Boise, it is absolutely quiet in much of the city all night long. And there are proposed to be well over 1000 hours of training flights.	S. Robertson	Thank you for your comment. Please see response to Comment 8 .
11	J. Zuckert	Public	There is a lot of research on the negative health effects on humans and other animals from being subjected to noise over a long period of time. This research needs to be included in the analysis.	S. Robertson	Thank you for your comment. Please see response to Comment 8 .
12	J. Zuckert	Public	Socioeconomics- The Treasure Valley is currently one of the fastest growing areas in the country. If word gets out that residents are subjected to the sound of hundreds of military overflights each year and are frequently awakened from sleep by the jets, the desirability of this area may disappear and growth may end or slow. This potential should be analyzed.	S. Robertson	Thank you for your comment. Please see response to Comment 8 .

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
13	J. Zuckert	Public	Inadequate safety analysis. The draft EA looks at the past, when Mtn Home AFB was not operating over urban areas and was not operating in the same airspace as hundreds of private and commercial planes each day, to predict a very low risk of collisions and crashes. This greatly underestimates the risk and likelihood of crashes to a population exceeding 500,000 people, as well as additional people in aircraft. This analysis needs to be redone.	S. Robertson	Thank you for your comment. The airspace over Boise is a part of the National Airspace System (NAS) (controlled by the Federal Aviation Administration). The NAS is available to all aircraft to include the Department of Defense (DoD). Military aircraft, including those from Mountain Home AFB, routinely fly within the NAS, and perform the same instrument procedures as commercial, corporate, and general aviation.
14	J. Zuckert	Public	The safety aspects of laser damage to humans and animals also needs to be better researched and analyzed. (1) Pilots are not going to think about their elevation when shooting lasers in order to minimize risk. (2) The potential negative effects of different frequencies of radio waves also needs analysis.	S. Robertson	<p>Thank you for your comment.</p> <p>1. F-15E/F-15SG are flown by a pilot and a weapons system officer (WSO). There is a division of duty in the cockpit. The pilot flies the aircraft; the WSO operates the laser. Crew coordination is required to use the laser system in the appropriate manner. The division of duty ensures a check and balance during operation.</p> <p>2. Aircrews use VHF (30-300 megahertz) and UHF (300mg-3gigahertz) radio frequencies. VHF/UHF are standard frequencies are used world-wide. The frequencies have been set aside by the FCC for aviation use. There are no negative effects associated with these standard frequencies. The F-15E only utilizes VHF on the 108-137 MHz band and on UHF in the 225-400 MHz band. These are the frequencies actually allocated to aviation by the Federal Communications Commission, which is actually a smaller range of frequencies than currently listed in the</p>

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
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					comments.
15	J. Zuckert	Public	The no action alternative needs to be expanded. If the proposed action is not implemented, the military is not precluded from designing other training programs that may meet their mission while being less harmful and dangerous to a half million residents. The no action alternative also would have significant positive health and safety benefits to the population that should be described.	S. Robertson	Thank you for your comment. Please see response to Comment 4 . Please see the selection standards (Section 2.2) which were used to determine the reasonableness of alternatives that would be carried forward for analysis in the EA.
16	J. Zuckert	Public	I have worked on federal land in military operating areas in Idaho and California. I have observed that fighter jets routinely violate the airspace restrictions and fly much, much closer to the ground than is prescribed. Accurately reporting these events to the responsible air base has no effect on pilot behavior and the low flights continue. The low overflights greatly increase noise impacts and safety risks. How would this be addressed?	S. Robertson	Thank you for your comment. The 366 Fighter Wing (FW) Range Operations Office will monitor air operations for EA compliance. The information can be requested through the 366 FW Public Affairs Office (208-828-6800).
17	K. Hasselblad	Public	<p>1) Why are one-third of the training operations for the Singaporean Air Force? 2) Is this being done primarily for economic purposes? 3) Who benefits financially from this arrangement? A separate publication describes how USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20.</p> <p>One Singaporean news story quotes a local politician boasting about protecting his constituents in Singapore from harmful noise pollution from military aircraft. It seems they have shifted this problem to Idaho.</p> <p>Several other countries operate their own versions of the F-15. What other foreign militaries can be expected to utilize Idaho's new large urban combat zone to avoid unwanted impacts in their own countries? (4) USAF needs to be transparent. In fact, USAF's public outreach letter to stakeholders neglected to mention the Singaporean military planes and only mentioned the US F-15E aircraft.</p> <p>USAF's Urban Close Air Support (CAS) proposal is for an open-ended, i.e., permanent urban combat zone in Boise and other</p>	S. Robertson	Thank you for your comment. Please see response to Comment 4 .

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

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			Idahoan cities, without any mechanism for review to assess how operations in the urban combat zone will affect our rapidly growing area over time. That is, there is no sunset date or specified date to review potentially negative impacts in light of other developments – including other USAF developments – in the state.		
18	K. Hasselblad	Public	How can the public monitor USAF's compliance with the promised mitigation measures, such as limiting the number of flights, the flying altitudes, the extent of ground operations, etc.? In fact, USAF disclosed at the scoping meetings that USAF had <i>already</i> been conducting urban combat training in Boise – apparently for years – in violation of environmental requirements.	S. Robertson	Thank you for your comment. Please see response to Comment 16 .
19	k. Hasselblad	Public	<p>USAF has not adequately analyzed the health, safety, and environmental risks to humans or wildlife in its draft, and has not adequately consulted with public officials about these risks. Regarding noise, the U.S. Environmental Protection Agency states that, "Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity."</p> <p>The World Health Organization states that "children living in areas with high aircraft noise have delayed reading ages, poor attention levels, and high stress levels." USAF's analysis does not appear to include the cumulative impacts of the noise from the aircraft combined with the existing background noise.</p> <p>USAF calculations also appear to seriously undercount the proposed number of sorties by at least a third and the number of expected aircraft to be flying sorties. The USAF noise calculations need to be seriously analyzed by independent experts.</p>	S. Robertson	<p>Thank you for your comment. Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act to assess impacts that would result from implementing the proposed pilot proficiency training. Mountain Home AFB coordinated with regulators from the early planning stages, through public scoping, and through review of the EA to ensure awareness of the proposed training activities and the analysis approach.</p> <p>Because the proposed flight and ground operations would be limited in scope, and would be conducted as described in Sections. 2.1 through 2.1.6, impacts on certain resources either would not occur or would not have greater than negligible impacts. Therefore, those resources were reasonably and justifiably excluded from the full analysis (see Section 3, pages 3-1 and</p>

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
					<p>3-2). A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the EA (Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3), the proposed training would not result in significant impacts on resources. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an Environmental Impact Statement will not be required.</p> <p>Please also see responses to Comments 6 and 8. Appendix A, page A-1 lists the stakeholders and agencies with, which, Mountain Home AFB coordinated throughout the NEPA effort for this Proposed Action. All listed were provided access to the DOPAA during early planning and scoping, and the Draft EA/Draft FONSI during the public comment period. Any comments received can be found within Volume II of the EA.</p>
20	k. Hasselblad	Public	<p>Inadequate consultation with public officials, such as state and local law enforcement, USAF neglected to notify many of the cities and towns that will be affected, and also many of the state legislative districts.</p> <p>The AF neglected to consult with the Idaho Department of Environmental Quality on its list of relevant state agencies. Many of the affected cities were not included on the list of stakeholders and the list of state legislators included only two in Idaho and one in Oregon, ignoring numerous legislative districts that are included in the</p>	S. Robertson	<p>Thank you for your comment. Please see response to Comments 6 and 19. Also, there were no appreciable impacts on resources that DEQ manages, therefore coordination with this agency was determined to not be required.</p>

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			<p>proposed urban combat training zone.</p> <p>In summary, the list of stakeholders was arbitrary, and there was inadequate consultation with state, local, and federal agencies.</p>		
21	k. Hasselblad	Public	USAF does not appear to be seriously calculating the cumulative impacts of the proposed permanent urban combat zone and other USAF operations in Idaho, such as the proposed F-35. It appears they may be unlawfully segmenting USAF proposals so as to be able to claim that each of them has negligible impacts. USAF's separate analysis of the impacts of the F-35's have not been released.	S. Robertson	Thank you for your comment. Please see Section 4.2.1 for discussion regarding the potential cumulative effects associated with the proposed F-35 beddown.
22	k. Hasselblad	Public	How does this proposed permanent urban combat zone – the only one in the U.S. – fit with Boise's goal of being the “Most Livable City in the Country”? Boise and surrounding towns within a 17-mile radius will be impacted by increased noise and air pollution, with military aircraft circling overhead in a “wheel” and teams of “friendly” and “hostile” forces simulating warfare in civilian clothing and unmarked vehicles	S. Robertson	Thank you for your comment. Please see Section 4.2 , Cumulative Effects Analysis
23	k. Hasselblad	Public	The EA does not properly consider all socio-economic impacts. USAF does not address the psychological impacts on veterans, refugees, and other war survivors of simulated urban warfare and the activities mentioned above.	S. Robertson	Thank you for your comment. Please see Section 3 , page 3-2 of the EA regarding socioeconomics.
24	k. Hasselblad	Public	The USAF does not address the psychological impacts on current service members of waging simulated urban warfare in “the homeland.”	S. Robertson	Thank you for your comment.
25	k. Hasselblad	Public	The USAF has not done an analysis on air or noise quality impact on humans and on wildlife including migratory birds, and domestic animals.	S. Robertson	Thank you for your comment. Chapter 3 Affected Environment and Environmental Consequences, Sections 3.1 and 3.2 of the EA address Noise and Air Quality
26	k. Hasselblad	Public	Why isn't USAF doing a comprehensive Environmental Impact Statement? This EA includes only minimal analysis of the impacts. USAF regulations state that a full environmental impact statement should normally be conducted for expansion of supersonic training ground lower than 18,000 feet (this plan proposes 10,000 feet), yet	S. Robertson	Thank you for your comment. The proposed Urban CAS aircrew proficiency training does not include supersonic flight.

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			the USAF has determined an EIS is not necessary.		
27	P. Cedillo	Public	<p>Please find herein my strong objections to any audible Air Force flights over urban areas, particularly Boise and especially within the zone wherein hospitals are located. Additional areas to not be flown over are schools, universities and city centers. Fly-overs should especially NOT occur on weekends.</p> <p>My strong objection is based on the experience earlier this year when jets flew very low over Boise's city center, hospital, university and downtown neighborhoods and schools. This involved numerous flights throughout the day, for more than one day.</p> <p>The jets flying over were visible and extremely loud, the experience was deeply stressful. I am speaking as one sample of hundreds of citizens packed into a city center who were affected by this outrageous military act. An impact study must involve extensive study of the potential stress impacts across a population, including vulnerable population segments.</p> <p>It must be specifically considered that the Air Force is not protecting its citizens by terrorizing them.</p>	S. Robertson	Thank you for your comment. Please see response to Comment 8 . The proposed Urban CAS training would be conducted between 10,000 feet above ground level and 18,000 feet above mean sea level within a 15NM radius of each urban center.
28	C. Thompson	Public	<p>There have been multiple postings regarding submitting opinions regarding the latest attempt by the AF to impose massive noise pollution on Boise.</p> <p>The breakdown of reasons "why not" to are a duplicate of what we went through with the F35. Please refer to last year's fiasco for detail.</p> <p>To reiterate: the military is there to protect us. They are not supposed to harm us. Yet this is exactly what is happening. I was literally chased out of my back yard this weekend by the noise of F## jets at Boise's airport which is just 3 miles from downtown. Jets need to stay in Mountain Home AFB.</p> <p>And an opinion from someone that was in the Army - F## have never, and will never, be effective in CAS. Huge waste of money and lives.</p>	S. Robertson	Thank you for your comment. Please see response to Comment 8 .
29	B. Smith	Public	<p>I'm strongly opposed to the findings of FONSI and to the possible Urban CAS Air and Ground Training Spaces in and over Boise, Idaho. I find it impossible that your EA resulted in no significant impact.</p>	S. Robertson	Thank you for your comment. Please see response to Comment 8 . Also, the proposed Urban CAS training operations would be conducted, as described from

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			<p>As noted, I am strongly opposed, it will have a significant impact to Boise residents -people and animals.</p> <p>I do not chose to live in a war zone -even simulated ones! Your report states that your air and ground training would adequately simulate current mission realities of urban combat - that means Boise residents would experience a combat zone.</p> <p>The noise and tension and invasion of my living space is not acceptable or wanted.</p> <p>The aircraft at 10,000 feet would produce a noise level that is unacceptable to me and my dog. When your Thunderbird's were in Boise last year, the low level flyovers and the loud and sustained jet noise put my dog into a trembling state. He thought the noise was thunder. He was so scared he trembled and cried FOR THREE MONTHS afterwards every time he heard any jet noise. Might sound meaningless to your group but for all the dogs and their owners it is a big deal.</p> <p>This plan will have a significant impact to everyone in the Boise area - we do not want to live in an urban combat zone, just because we are convenient to MHAB doesn't make it your right to "invade".</p>		Sections 2.1 through 2.1.1.6.
30	S. Lewis	Public	I am in favor of the urban war games you are going to perform in Idaho. Thank you for your service.	S. Robertson	Thank you for your comment
31	M. Lane	Public	<p>I read in the Idaho Press Tribune that you are soliciting feedback regarding the planned war games/training exercises.</p> <p>I wholeheartedly agree with the need to practice urban CAS and encourage the Air Force to "train like we fight." A well-prepared, well trained military is essential to our nation's self-defense. Thank you for protecting our nation.</p>	S. Robertson	Thank you for your comment.
32	A.Rystad	Public	To whom it may concern, As a resident of Caldwell, I am in support of the U.S. Air Force plans to conduct urban close air support training here in the Treasurer Valley.	S. Robertson	Thank you for your comment.
33	D. Hill	Public	I strongly object to the proposed war games over Boise and neighboring SW Idaho cities. The noise would be very problematic for all residents, particularly our large refugee and veteran populations. A	S. Robertson	Thank you for your comment.

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			proper Environmental Impact Statement is in order, at the very least.		
34	A.Hausrath	Public	Key stakeholders do not appear to have been included in the original scoping efforts for evaluation of the proposal and comment: Idaho Department of Environmental Quality Idaho State Representatives and Senators from all the southern Idaho affected districts, including all of Boise's legislative districts	S. Robertson	Thank you for your comment. Please see response to Comments 6, 19, and 20 . Any comments received can be found within Volume II of the EA.
35	A Hausrath	Public	There has not been adequate public notice or any serious public involvement process. The two public scoping meetings in Boise were held with very little advance notice.	S. Robertson	Thank you for your comment.
36	A Hausrath	Public	The project appears to be open-ended with no sunset clause. What means of evaluation do you propose? How are elected officials at the federal, state, and local level going to be involved in that evaluation?	S. Robertson	Thank you for your comment. The proposed Urban CAS aircrew proficiency training is for the F-15E and F-15SG based at Mountain Home AFB. Mountain Home AFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise. Coordination with local, state, and federal officials is guided by DODI 1322.28 (please see response to Comment 5).
37	A Hausrath	Public	What is the proposed benefit to American citizens or the residents of southern Idaho of having one third of the pilots be from the Singapore Air Force?	S. Robertson	Thank you for your comment. Please see response to Comment 4 .
38	A Hausrath	Public	If in the future the Air Force were to propose to increase the number of foreign pilots or pilots from another nation, what process do you propose to follow for stakeholder input? Will you do an additional Environmental Assessment? Or Environmental Impact Statement?	S. Robertson	Please see response to Comment 36
39	A Hausrath	Public	What is the benefit of having foreign pilots from Singapore communicating with American ground crews from southern Idaho? You state that practice in coordination is crucial yet when in any possible warfare scenario would American ground crews be coordinating with pilots from Singapore? This inconsistency needs to be addressed!	S. Robertson	Thank you for your comment. Please see response to Comment 4 .
40	A	Public	You propose to have planes flying over the city of Boise and ground	S. Robertson	Please see response to Comment 5 . Local

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	Hausrath		support teams on the streets potentially for over one third of the year. How specifically do you plan to coordinate with the Boise Police Department regarding position of the ground teams? How many hours of local police time do you expect will be needed for this coordination?		law enforcement are not expected to expend additional time on coordination.
41	A Hausrath	Public	In the first part of Vol. I you state that ground crews may enter buildings or may need to get to upper floors of buildings. Later in Volume I you state that ground crews will not go into buildings. This serious contradiction needs to be addressed. Will they or will they not be entering buildings?	S. Robertson	Thank you for your comment. Section 1.3 , pages 1-3 and 1-4 of the EA defines the existing proficiency training in Urban CAS on Mountain Home AFB. Section 2.1.5 , page 2-2 of the document defines the ground support activities associated proposed action. Ground support teams will only operate along paved public roads, will abide by standard traffic safety regulations and behave in a manner typical of the average citizen, and will not enter any buildings. Ground support will not operate outside urban environments
42	A Hausrath	Public	You state that there may need to be some adjustment of local flight patterns. How specifically do you plan to coordinate with the Boise Airport personnel?	S. Robertson	Thank you for your comment. As a standard practice, the flight plan is filed with the FAA prior to take-off. Pilots would coordinate with air traffic control in accordance with existing flight safety rules. As noted in the response to Comment 13 , military flights routinely occur in FAA-regulated airspaces, including airspace over Boise. Standard airspace deconfliction practices through pilot communication with air traffic control would be followed. Adjustments to local flight patterns are monitored by Air Traffic Control (ATC) radar and aircraft transponders. If the Proposed Action moves forward, the 366FW/A3TS will establish letters of agreement with the FAA/ATC for all IFR flights scheduled and operated under this proposal. Any VFR Flights under this proposal will be

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					conducted in accordance with both Federal Aviation Regulations and Air Force Instructions.
43	A Hausrath	Public	You state that combat lasers will never be used because there is a switch that will never be turned on. How do you reassure us, the residents, that human error will never allow the mistake of flipping that switch?	S. Robertson	Thank you for your comment. Please see response to Comment 14 .
44	A Hausrath	Public	You state that there will be some long term adverse effects regarding noise and air pollution. How do you plan to monitor those effects? What metrics do you plan to use? What modeling have you done to include cumulative effects related to population growth in southern Idaho and the Boise area, increased wildfires and smoke?	S. Robertson	Thank you for your comment. Please see response to Comment 16 .
45	R.J. Reimann	Public	Please avoid the annoyance and potential danger created by the Air Force's plan for training in the "urban canyons" of Boise. Most of this training can be accomplished with flights through Bruneau Canyon and in the City of Rocks near Burley. Thank you for considering this alternative.	S. Robertson	Thank you for your comment. Please see response to Comment 4 . To meet proficiency requirements, training in large, medium, and small urban environments is required. Please see the EA (Section 2.2 , page 2-8) for the defined selection standards.
46	J. Morales	Public	First and foremost, thank you for your service. I greatly appreciate the professionalism and training our servicewomen and servicemen adhere to in an effort to prepare to protect this county. I've been alarmed by the lack of citizen involvement solicited for recent proposals such as basing the F35 at Gowen Field (I know, that's not USAF) and these training exercises which I'm writing to provide public comment in opposition. The biggest concern is the lack of a pilot program where such proposals are run for a week or two so residents can get a real feel and listen for what the impacts will be on our communities. I think before the USAF is given permanent approval for these exercises, that there should first be approval for a pilot with a short timeframe. Then we can really see how this proposal really *sounds*.	S. Robertson	Thank you for your comment. Thank you for your comment. Please see response to Comment 6 .
47	A.DeBolt	Public	You propose to have planes flying over the city of Boise and ground support teams on the streets potentially for over one third of the year.	S. Robertson	Thank you for your comment. Please see response to Comment 5 .

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			How specifically do you plan to coordinate with the Boise Police Department regarding position of the ground teams? How many hours of local police time do you expect will be needed for this coordination?		
48	A.DeBolt	Public	The EA describes the emergency services available from the impacted municipalities. Will it be these municipalities' responsibility to deal with the potential mishaps from the AF? Does the AF intend to provide additional funding to communities for enhanced emergency services to deal with an AF caused disaster?	S. Robertson	Thank you for your comment. Please see response to Comments 13, 14, and 42 . Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).
49	A.DeBolt	Public	The AF contends that the 'eye safe' lasers used in their training operations won't cause any harm as long as it has been properly put into the 'training' mode as opposed to the 'combat' mode. Again, the finding of no significant impact is based on the assumption that an error will never occur. You state that combat lasers will never be used because there is a switch that will never be turned on. How do you reassure us, the residents, that human error will never allow the mistake of flipping that switch?	S. Robertson	Thank you for your comment. Please see response to Comment 14 .
50	A.DeBolt	Public	You state that there will also be some long-term adverse effects regarding noise pollution. The AF's use of noise averaging over a 24 hour period (DNL) and conclusion that there is no significant impact is illogical. The noise impacts are from the individual sorties at the time of the activity. The AF does acknowledge that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. And this could occur 160 days a year. This alone should trigger and EIS!!! The noise duration for these events is in no way comparable to that of commercial airliners. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities. As a resident of SE Boise for more than 25 years, I do not remember jet noise like what we have experienced for the past month, which is apparently due to transient military aircraft. It has been disruptive and disconcerting, even though it has primarily taken place Fridays-Sundays. I cannot imagine what it will be like to live here in the	S. Robertson	Thank you for your comment. Please see response to Comment 8 . Noise levels associated with the proposed aircrew proficiency training was modeled using NOISEMAP, a suite of computer programs and components to predict noise exposure due to aircraft operations. Air Force Instruction (AFI) 32-7063, Air Installations Compatible Use Zones Program, provide land use guidelines for noise exposure.

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			future, should the proposed action be approved. I believe it will be intolerable.		
51	A.DeBolt	Public	You state that there will be some long term adverse effects regarding air pollution. How will these effects be monitor? What modeling have you done to include cumulative effects related to population growth in southern Idaho and the Boise area, increased wildfires and smoke?	S. Robertson	<p>Thank you for your comment. Section 3.2.3.1 of the EA details the air quality modeling analysis conducted to assess emissions levels anticipated from the proposed training activities. The Air Force's Air Conformity Applicability Model was used to estimate the total direct and indirect emissions from the Proposed Action Alternative, which have been compared to <i>de minimis</i> thresholds for air pollutants to determine the level of impacts. Results of the analysis indicated that air emissions from the proposed flight operations would be below the <i>de minimis</i> threshold of 100 tons per year of each pollutant in all areas; therefore, impacts would be minor.</p> <p>Also, please see response to Comments 13, 14, 42, and 66. Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military). Please see response to Comment 16.</p>
52	A.DeBolt	Public	<p>There has not been adequate public notice or any serious public involvement process. The two public scoping meetings in Boise were held with very little advance notice. Key stakeholders do not appear to have been included in the original scoping efforts for evaluation of the proposal and comment:</p> <p>Idaho Department of Environmental Quality</p> <p>Idaho State Representatives and Senators from all the southern Idaho affected districts, including all of Boise's legislative districts, need to be involved.</p>	S. Robertson	Thank you for your comment. Please see response to Comments 6 and 20 .

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53	A.DeBolt	Public	You state that there may need to be some adjustment of local flight patterns. How specifically do you plan to coordinate with the Boise Airport personnel? The simple fact is that as Boise continues to grow the airport has continued to expand operations and add commercial flights. The addition of AF training exercises will only exacerbate the problems of growth and increase the risk of a disaster resulting in loss of life.	S. Robertson	Thank you for your comment. Please see response to Comment 42 .
54	A.DeBolt	Public	The EA is dismissive of impacts to biological resources. While no direct, on-the-ground disturbances are proposed, the assertion that there will be no impacts to wildlife is flawed. The impact of increased noise levels, particularly at night when it is otherwise relatively quiet, need to be more thoroughly examined. Potential disruption to the behavior of sensitive nocturnal species such as bats and owls should be considered in an EIS.	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
55	A.DeBolt	Public	The proposed training activities have the potential to significantly impact our quality of life, and the health and safety of citizens and wildlife, not just in Boise but throughout the larger “action areas”. I urge you to do the thorough analysis that is needed by preparing and Environmental Impact Statement.	S. Robertson	Thank you for your comment.
56	R. Rosentretter	Public	The proposal is for jets to fly over the city of Boise and for ground support teams to be on the streets for more than one third of the year. How specifically do you plan to coordinate with the Boise Police Department and other Emergency Services personnel regarding position of the ground teams? How many hours of local police time do you expect will be needed for this coordination? The EA describes the emergency services available from the impacted municipalities. Will it be these municipalities’ responsibility to deal with potential mishaps from the Air Force? Does the Air Force intend to provide additional funding to communities for enhanced emergency services to deal with an Air Force caused disaster?	S. Robertson	Thank you for your comment. Please see response to Comments 5, 13 and 42 . Local law enforcement are not expected to expend additional time on coordination. Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).
57	R. Rosentretter	Public	The Air Force contends that the ‘eye-safe’ lasers used in their training operations won’t cause any harm as long as it has been properly put into the ‘training’ mode as opposed to the ‘combat’ mode. Again, the finding of no significant impact is based on the assumption that an error will never occur. You state that combat lasers will never be used	S. Robertson	Thank you for your comment. Please see response to Comment 14 .

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			because there is a switch that will never be turned on. How do you reassure us, the residents, that human error will never allow the mistake of flipping that switch?		
58	R. Rosentretter	Public	You state that there will be some long-term adverse effects regarding air pollution. How will these effects be monitored? What modeling have you done to include cumulative effects related to population growth in southern Idaho and the Boise area, increased wildfires and smoke? The Treasure Valley already has significant air quality issues, particularly during the winter when inversions trap pollutants in the valley and during the summer when winds frequently bring smoke from wildfires into the region. We do not need additional pollutants that are unnecessary. This is becoming a significant health issue for many residents of the valley. The Air Force should be precluded from training exercises in the region during periods when the air quality is poor.	S. Robertson	Thank you for your comment. Please see response to Comments 16 and 51 .
59	R. Rosentretter	Public	You state that there will also be some long-term adverse effects regarding noise pollution. The Air Force's use of noise averaging over a 24 hour period (DNL) and conclusion that there is no significant impact is illogical. The noise impacts are from the individual sorties at the time of the activity. The Air Force does acknowledge that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single training event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. And this could occur 160 days of the year. This alone should trigger an EIS!!! The noise duration for these events is in no way comparable to that of commercial airliners. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities. As a resident of SE Boise for more than 40 years, I do not remember jet noise like what we have experienced for the past month, which is apparently due to transient military aircraft that have a contract with the Jackson Jet Center to use their ramp space at the Boise Airport for training. It has been disruptive and disconcerting, even though it has primarily taken place Fridays-Sundays. I cannot imagine what it will be like to live here in the future, should the	S. Robertson	Thank you for your comment. Please see response to Comments 8 and 19 . Additionally, as described in Section 2.1.5 , flight operations over an urban center would occur over a duration of 60 to 90 minutes within a 15NM radius of the city center. Each training operation would be followed by a 2- to 3-hour period of no flight activity.

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			proposed action be approved. I believe it will be intolerable.		
60	R. Rosentretter	Public	There has not been adequate public notice or serious public involvement. The two public scoping meetings in Boise were held with very little advance notice, ie. just a few days, and the one I attended was on a Friday night. There was only one member of the State Legislature and one Boise City Council member in attendance. Two days before that meeting, it was rumored that the Boise City Council and Mayor had also just heard about the meeting. Key stakeholders do not appear to have been included in the original scoping efforts for evaluation of the proposal. Idaho Department of Environmental Quality staff and Idaho State Representatives and Senators from all the southern Idaho affected districts, including all of Boise's legislative districts, need to be involved.	S. Robertson	Thank you for your comment. Please see response to Comment 6, 19 and 20 .
61	R. Rosentretter	Public	You state that there may need to be some adjustment of local flight patterns. How specifically do you plan to coordinate with the Boise Airport personnel? The simple fact is that as Boise continues to grow the airport has continued to expand operations and add commercial flights. The addition of Air Force training exercises will only exacerbate the problems of growth and increase the risk of a disaster resulting in the loss of life.	S. Robertson	Thank you for your comment. Please see responses to Comments 19 and 42 .
62	R. Rosentretter	Public	The EA is dismissive of impacts to biological resources. While no direct, on-the-ground disturbances are proposed, the assertion that there will be no impacts to wildlife is flawed. The impact of increased noise levels, particularly at night when it is otherwise relatively quiet, need to be more thoroughly examined. Potential disruption to the behavior of sensitive nocturnal species such as bats and owls should be considered in an EIS. The EA discounts potential impacts to migratory birds by claiming that since the overall number of air operations will remain the same, the impacts of Air Force training activities are also the same. This assertion ignores the fact that the proposed activities will impact a different geographic area and therefore have the potential to disrupt other corridors for migratory birds. The Intermountain Bird Observatory and the Morley Nelson Birds of Prey National Conservation Area are both located within the proposed training area, and thus a comprehensive analysis of	S. Robertson	Thank you for your comment. Regulating agencies (listed in Appendix A , page A-1) were informed of the proposed flight training from initiation of the project through development of the EA, and were provided copies of the analysis for review and comment. No agency comments indicated concerns or disagreement with the existing approach for analysis in the EA.

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			migratory corridors within the expanded training area needs to be conducted. The proposed training activities have the potential to significantly impact our quality of life, and the health and safety of citizens and wildlife, not just in Boise but throughout the larger “action area”. I urge you to do the thorough analysis that is needed by preparing an Environmental Impact Statement. Thank you for the opportunity to comment.		
63	K. Mercer	Public	I have read through the environmental assessment, and am thoroughly opposed to the potential impact on residents in Boise and surrounding areas. The military should structure needed training in some other way.	S. Robertson	Thank you for your comment.
64	M. Denning	Public	I am opposed to F-15's operating over Boise. I presume they will be landing and taking off from the Boise Airport/Gowen Field? Touch and Go's? The energy and noise impact is intense for all living in the flight paths, my neighborhood included. I am concerned for everyone living here, our peaceful quality of life. A-10's are imperceptible in comparison. Potential for PTSD triggers for veterans, me included, and refugees is another important concern. Urban militarized operations in our community is also cause of more concern. I understand the need for training both for ground and air crews, but the impact is too high for our community. Thank you.	S. Robertson	Thank you for your comment. The proposed training operations are fully described in Sections 2.1 through 2.1.6 of the EA. All take off and landings and would occur at Mountain Home AFB. No touch and go flight operations from the Boise Airport/Gowen Field would occur under this proposed action. Additionally, please see response to Comment 8 .
65	A.Haak	Public	The AF's use of noise averaging over a 24 hour period (DNL) and conclusion that there is no significant impact is ludicrous. The noise impacts are from the individual sorties at the time of the activity. The AF does acknowledge that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. And this could occur 160 days a year! The noise duration for these events is in no way comparable to that of commercial airliners. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities. In Tables 3-5 and 3-6 the AF shows the SEL of four aircraft	S. Robertson	Thank you for your comment. Please see response to Comment 8 .

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			formations to be the 90dBA SEL threshold for sleep interference. According to whom? As someone who is a very light sleeper and enjoys sleeping with my windows open, I am very concerned about having my precarious sleep disrupted by the sounds of F-15s. The needs of people with sleeping disorders and challenges need to be taken into account when considering noise levels that are found to be disruptive.		
66	A.Haak	Public	The AF's plan for safety is to not have any accidents. We all know that is an impossibility – accidents happen and flying complex military jets loaded with fuel over densely populated areas greatly increases the catastrophic impacts of an inevitable accident. If problems arise, pilots are allowed to jettison their fuel over 'unpopulated areas'. Is that the Boise Foothills, Bogus Basin or perhaps the desert south of town where people go to recreate? There is nowhere within the training circle around Boise that is not inhabited or used by local residents so where will they jettison their fuel if the unexpected happens and a pilot suddenly needs to lighten his/her load?	S. Robertson	Thank you for your comment. Please see response to Comments 13 and 42 . For flights out of Mountain Home AFB, jettisoning of fuel is a preplanned event that is only conducted in prescribed, controlled environments. Flying CAS does not put the aircrew into a flight regime that would risk loss of aircraft control or require the jettison of fuel.
67	A.Haak	Public	The EA describes the emergency services available from the impacted municipalities. Will it be these municipalities' responsibility to deal with the potential mishaps from the AF? Does the AF intend to provide additional funding to communities for enhanced emergency services to deal with an AF caused disaster?	S. Robertson	Thank you for your comment. Please see response to Comments 13, 14, 42, and 66 . Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).
68	A.Haak	Public	Similarly, the Air Force contends that the 'eye-safe' lasers used in their training operations won't cause any harm as long as it has been properly put into the 'training' mode as opposed to the 'combat' mode. Again, the finding of no significant impact is based on the assumption that an error will never occur. Are citizens expected to gamble their vision on the belief that the military never makes a mistake?	S. Robertson	Thank you for your comment. Please see response to Comment 14 .
69	A.Haak	Public	And finally, there is the simple fact that as Boise continues to grow the airport has also continued the expand operations and add commercial flights. The addition of AF training exercised will only exacerbate the problems of growth and increase the risk of disaster resulting in the loss of life.	S. Robertson	Thank you for your comment. Please see response to Comments 13 and 42 .
70	A.Haak	Public	The EA does not evaluate issues of Environmental Justice,	S. Robertson	Thank you for your comment. Please see

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			dismissing concerns from the outset based on their assertion that noise impacts averaged over a 24-hour period are negligible. However, they did not consider the affect of the noise and visual displays of fighter jets on people suffering from PTSD. This group includes not only veterans but also many of the refugees now living in Boise who have come here to escape violence and war in their home countries. The adverse impact of AF activities on these vulnerable residents of our community need to be given serious consideration in an EIS.		responses to Comments 8 and 19 .
71	A.Haak	Public	<p>The EA is dismissive of impacts to biological resources. While no direct, on-the-ground disturbances are proposed, the assertion that there will be no impacts to wildlife is flawed. The impact of increased noise levels, particularly at night when it is otherwise relatively quiet, need to be more thoroughly examined. Potential disruption to the behavior of sensitive nocturnal species such as bats and owls should be considered in an EIS. The EA discounts potential impacts to migratory birds by claiming that since the overall number of air operations will remain the same, the impacts of Air Force training activities are also the same. This assertion ignores the fact that the proposed activities will impact a different geographic area and therefore have the potential to disrupt other corridors for migratory birds. The Intermountain Bird Observatory located to the east of Boise and within the training circle is an example of the types of areas adversely impacted by this proposal. A comprehensive analysis of migratory corridors within the expanded training area needs to be conducted.</p> <p>In summary, the proposed training activities have the potential to significantly impact the local environment and quality of life, health and safety of the citizens of Boise. Before moving forward with the proposed actions, a thorough analysis of impacts and training alternatives must be conducted in an Environmental Impact Statement.</p>	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
72	Piper-Ruth	Public	It is our understanding that this would be the only permanent urban combat training zone in the country. How does this fit with Boise's goal of being the "Most Livable City in the Country"? Boise and surrounding towns will be impacted by increased noise and air	S. Robertson	Thank you for your comment. Proposed air and ground training activities would be conducted as described in Sections 2.1 through 2.1.6 . Also, please see response to

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			pollution, with military aircraft circling overhead and teams of “friendly” and “hostile” forces simulating warfare in civilian clothing and unmarked vehicles. This could cause real confusion and danger for our citizens.		Comment 8.
73	Piper-Ruth	Public	The proposal is for an open-ended, permanent urban combat zone without mechanism for review to see how this training is affecting our rapidly growing area. There is no specified date to review potentially negative impacts. We do not think this is acceptable.	S. Robertson	Thank you for your comment.
74	Piper-Ruth	Public	We are very concerned about the psychological impacts on veterans, refugees, and other war survivors of this simulated urban warfare. Boise is well know(n) for the amazing work it does with refugees. It just doesn't make any sense to expose anyone to sights and sounds that would traumatize them due to their past experiences	S. Robertson	Thank you for your comment. Please see response to Comments 13 and 42 .
75	Piper-Ruth	Public	We are concerned that a full Environmental Impact Statement has not been conducted. USAF regulations state that a full environmental impact statement should normally be conducted for expansion of supersonic training ground lower than 18,000 feet (this plan proposes 10,000 feet), yet the USAF has determined an EIS is not necessary. We think a full EIS should be conducted.	S. Robertson	Thank you for your comment. Please see response to Comment 64 . The proposed Urban CAS training is fully described in Sections 2.1 through 2.1.6 of the EA. The proposed training and would not involve supersonic flight.
76	Piper-Ruth	Public	We understand that one-third of the training operations is for the Singaporean Air Force. We do not want our citizens to have to suffer the ills of noise and air pollution and the other negative things mentioned above for the benefit of a foreign nation. We do not believe that we as a city, state or nation benefit from this arrangement. A publication says that the USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20.	S. Robertson	Thank you for your comment. Please see responses to Comments 4 and 6 .
77	M. Stambulis	Public	I am completely against using Boise as a training ground for the urban “war on terror.” I am against using the city of Boise – one of the fastest growing cities in the US as well as a refugee center – for training of not just US	S. Robertson	Thank you for your comment. Please see response to Comment 19 .

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			<p>troops but of foreign troops. Foreign troops especially have no right to conduct their training missions in our city.</p> <p>I am against forcing our civilian population to accept the presence of unidentified persons of unknown authority operating with unspecified liability and who appear to have no accountability for their behavior.</p> <p>With that said, this Environmental Assessment (EA) fails to substantiate a finding of no significant impact (FONSI), and fails to provide adequate justification for not preparing a full Environmental Impact Statement.</p> <p>Overall, this proposal does not adequately and objectively consider impacts to the citizens of the communities where the training is proposed.</p>		
78	M. Stambulis	Public	<p>Public Participation: There were serious shortcomings in the public participation leading up to the preparation of the EA. These shortcomings included the following:</p> <ul style="list-style-type: none"> • Lack of advanced notice • Abrupt cancellation and rescheduling of meetings • Lack of public meetings in all affected communities • Lack of notification to <u>everyone</u> in the affected area <p>The last is especially critical. As one example, if a water company is going to propose something such as a rate increase, the company will typically publish a legal notice and notify all customers in writing via their monthly bill.</p> <p>As this proposal will affect the largest population center of the State of Idaho along with many more Idahoans in surrounding areas mailings should have been sent to the entire affected population.</p> <p>In addition, legal notices of public meetings should have been published in advance of the meetings. If legal notices were published, copies of those publications were not included within the EA.</p>	S. Robertson	Thank you for your comment. Please see response to Comment 6 .
79	M. Stambulis	Public	<p>Public Opposition: For the limited effort put into the public outreach, the response to the proposal was overwhelmingly negative. From the</p>	S. Robertson	Thank you for your comment. Please see response to Comments 6 and 19 .

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			<p>information provided in Appendix A, I counted over 30 comments opposing the proposal and only two in support. However, the lack of public support was not mentioned anywhere within the body of the EA.</p> <p>Many of the comments in opposition directly spoke to the impacts on urban quality. As stated in Subsection 1502.16.g of Chapter V of Title 40 of the Code of Federal Regulations (40 CFR V), the discussion of environmental impacts of the alternatives must include a discussion of urban quality.</p>		
80	M. Stambulis	Public	<p><u>Lack of Alternatives:</u> The EA does not adequately consider all reasonable alternatives. Subsections 1502.14 and 1502.16 of 40 CFR V clearly state the requirement to rigorously explore and <u>objectively</u> evaluate all reasonable alternatives, and subsequently provide a discussion that includes all the environmental impacts of the alternatives.</p> <p>Alternatives that should be considered are included in the following list:</p> <ul style="list-style-type: none"> • Enhance the facilities at the Mountain Home Range Complex (MHRC) such as Saylor Creek • Use video simulations • Periodically fly and train at other military sites (note: this alternative was briefly discussed, but it was not rigorously and objectively explored) • Enhance facilities on the Mountain Home Air Force Base • Use a combination of the above alternatives <p>The environmental impacts, including urban quality and other socio-economic impacts, must be considered with the stated preferred alternative. As there are significant impacts from the proposed action, these impacts must be weighed against not only the No Action Alternative, but all other reasonable alternatives.</p>	S. Robertson	Thank you for your comment. Please see response to Comment 4 . Reliance upon Mountain Home AFB's installation airspace and range complex areas for the proposed training would not satisfy the purpose and need for the Proposed Action. Please see Sections 1.5 and Section 2.4 for details.
81	M. Stanbulis	Public	<p><u>Socioeconomics and Environmental Justice:</u> The EA fails to account for the socioeconomic impacts regarding the livability of the nine urban centers as this will be the only area in the country where such training is conducted. It will economically affect land owner's</p>	S. Robertson	Thank you for your comment. Please see responses to Comments 8 and 19

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			<p>property values and the livability and desirability of the Boise and the surrounding areas.</p> <p>Boise is one of the fastest growing populations in the west. The Treasure Valley, and Boise in particular, show up on many Top 10 lists for desirable areas to live for a host of reasons. How will turning this valley into an urban military training ground affect those rankings?</p> <p>Boise is a refugee relocation center – many of these refugees are relocated to Boise from war zones. The proposal fails to consider the negative impacts to refugees and veterans with post traumatic stress disorder (PTSD) as they encounter not only noise from the air sorties but potentially encounter unmarked ground troops acting as though we are in a war zone.</p>		
82	M. Stambulis	Public	If ground support personnel may be positioned on publically accessible paved roads such as driving along streets or parked along the side of a road, how can you guarantee that ground support would not interfere with civilian traffic or pedestrians?	S. Robertson	Thank you for your comment. Please see responses to Comments 5 and 41 .
83	M. Stambulis	Public	<p>Proposed Action. Adequate justification has not been provided for the proposed action. With the advancement of drones being used in these urban environments, I question the need to continue this training.</p> <ul style="list-style-type: none"> • How many missions of this type have been flown in recent years? • Are the numbers of these missions increasing or decreasing? • What is the legal basis for flying these types of missions in urban combat zones – there has not been a declaration of war to authorize these missions? 	S. Robertson	Thank you for your comment. The proposed training is required to gain operational proficiency in addressing the challenges described in Section 1.3 , and to meet the purpose and need specified in Section 1.5 of the EA.
84	M. Stambulis	Public	<p>Section 1.3: “Ground support personnel are dressed and behave in a manner that is consistent with the civilian community to avoid drawing attention to operations. To facilitate aircrew tracking of identified targets, lead JTAC may be positioned in or on buildings in areas that provide broad line of sight. Remaining ground support personnel may be positioned anywhere on the installation, such as in vehicles driving along streets or parked along the side of a road, walking along sidewalks, or walking into or out of buildings.”</p> <p>Section 2.1.2 further indicates up to 15 personnel would simulate</p>	S. Robertson	Thank you for your comment. Please see response to Comments 5 and 41 . Section 1.3 describes existing training conditions as currently conducted on the installation. Sections 2.1.2 and 2.1.5 describe the numbers of personnel involved with training missions and the scope of ground support operations associated with the proposed training.

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			friendly forces and would include JTACs and up to 20 personnel would simulate non-friendly forces. These activities have a high probability for encounters with civilians. What happens when there is a conflict between JTAC and civilians? There is no discussion of JTAC responsibilities and jurisdiction regarding encounters with civilians.		
85	M. Stambulis	Public	Section 1.5: “The Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirements.” Not all reasonable alternatives have been considered. Given the paucity of Boise’s urban canyon, the alternative of enhancing training ranges already in existence must be included as an alternative, and the effects of this alternative must be compared side-by-side with the proposal and the no action alternative. The presence or absence of a civilian population in the training area should not negatively affect the training as the purpose is stated as fully practicing the laser designation processes in varied urban settings. The purpose is stated as gaining a practical understanding of, and operational familiarity with, the environmental challenges that can disrupt the laser targeting efforts. These objectives can be met by enhancing the current training facilities. Enhancing the current training facilities would have significantly less impact on the socio-economic resources of Boise and its’ citizens.	S. Robertson	Thank you for your comment. Please see response to Comment 4 . Reliance upon Mountain Home AFB’s installation airspace and range complex areas for the proposed training would not satisfy the purpose and need for the Proposed Action. Please see Sections 1.5 and Section 2.4 for details.
86	M. Stambulis	Public	Section 2.1.3: Will there be refueling touchdowns at Gowen Field? These impacts were not considered in the noise or air quality analysis.	S. Robertson	Thank you for your comment. Please see response to Comment 64 .
87	M. Stambulis	Public	Section 2.1.5: It is unrealistic to expect a group of up to five civilian vehicles for FFOR and five civilian vehicles for OPFOR would “...avoid drawing attention to themselves or the operations.”	S. Robertson	Thank you for your comment. Please see response to Comment 41 . Ground support activities would be conducted as describe in Section 2 of the EA.
88	M. Stambulis	Public	Section 2.5: The alternatives do not consider enhancing the current facilities around the MHRC to simulate the large urban centers. The alternatives must compare all environmental impacts of reasonable	S. Robertson	Thank you for your comment. Please see responses to Comments 4 and 80 . Reliance upon Mountain Home AFB’s

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			alternatives. The citizens of the urban centers bear the brunt of the environmental impacts, and these are not considered in the socio-economic impacts.		installation airspace and range complex areas for the proposed training would not satisfy the purpose and need for the Proposed Action. Please see Sections 1.5 and Section 2.4 for details.
89	M. Stambulis	Public	<p>Section 3.1: The noise analysis does not consider those citizens who work night shifts and will be subject to noise during the day; nor does it consider other sensitive populations.</p> <p>Using a Department of Defense document as justification for establishing the noise level which will begin to interfere with sleep is not an independent source. Does the 90dBA SEL account for children, who have a higher awakening threshold than adults, and vulnerable populations such as shift workers whose sleep structure is under stress due to the adaptations of their circadian rhythm?</p> <p>As one example, the World Health Organization (WHO), Europe, has published Night Noise Guidelines for Europe.</p> <p>http://www.euro.who.int/en/health-topics/environment-and-health/noise/publications/2009/night-noise-guidelines-for-europe</p> <p>The levels that may disturb sleep are much lower than the stated 90 A-weighted decibels Sound Exposure Level (dBA SEL). Page XVIII of the executive summary states, in part:</p> <p>“If negative effects on sleep are to be avoided the equivalent sound pressure level should not exceed 30 dBA indoors for continuous noise. If the noise is not continuous, sleep disturbance correlates best with L_{Amax} and effects have been observed at 45 dB or less. This is particularly true if the background level is low. Noise events exceeding 45 dBA should therefore be limited if possible. For sensitive people an even lower limit would be preferred...</p> <p>Important new studies (Passchier-Vermeer et al., 2002; Basner et al., 2004) have become available since then, together with new insights into normal and disturbed sleep. New information has made more precise assessment of exposure-effect relationship. The thresholds are now known to be lower than L_{Amax} of 45 dB for a number of effects...”</p> <p>Page 9, Methods and Criteria, of the WHO document relates</p>	S. Robertson	Thank you for your comment. Please see the response to Comments 8 and 16 . Also, Mountain Home AFB Public Affairs Office can be contacted at 208-828-6800 for any complaints. This information is available to the public.

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			<p>SEL to L_{Amax}:</p> <p>$SEL = 23.9 + 0.81 * L_{Amax}$</p> <p>Therefore, health effects may be seen at SELs of 60 dBA. This WHO document compiles data from multiple independent studies, and this data indicates multiple health effects may occur at levels substantially lower than presented in EA.</p> <p>The potential sound levels were developed by a suite of computer programs. As this proposal is open-ended with no timeframe, there is no mechanism to review if these computer programs were accurate and there are indeed no impacts on affected populations. A sunset date for this proposal must be provided, and a mechanism outside of modeling to review its' impacts on the populations must be developed.</p> <p>There is no accountability from the USAF to determine if the modeling was correct in assessing noise impacts. At the very least, a hotline to register noise complaints must be established. More robust measurement of actual noise impacts during training runs would be best.</p>		
90	M. Stambulis	Public	Section 3.2. The Idaho Department of Environmental Quality was not consulted for the Air Quality section. Therefore, not all relevant agencies were consulted in this evaluation.	S. Robertson	Please see responses to Comments 6, 19 and 20 .
91	M. Stambulis	Public	<p>Summary: The document does not provide a summary of environmental consequences as required by Subsection 1502.16 of Chapter V of Title 40 of the Code of Federal Regulations. As such, important environmental consequences are not considered: "Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned."</p> <p>The proposed action is not congruent with the local government of the City of Boise and surrounding area and their desire to maintain livability.</p> <p>"Urban quality, historic and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures." The proposal does not</p>	S. Robertson	<p>Thank you for your comment. Please see response to Comment 19. A summary impacts table was incorporated in Section 2.7 of the EA.</p> <p>40 CFR 1502.16 states the requirements for development of an Environmental Impact Statement. As explained in the response to Comment 19, analysis in the EA determined that impacts from the proposed training would be less than significant. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an</p>

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			<p>take into account the degradation of urban quality to the residents of Boise.</p> <p>The open-ended proposal only speculates on potential impacts and provides no manner to review and substantiate the assumptions that went into the FONSI.</p> <p>The FONSI is not substantiated, not all alternatives were considered, and by federal law, an full Environmental Impact Study is required.</p>		<p>EIS is not warranted.</p> <p>The proposed Urban CAS aircrew proficiency training is for the F-15E and F-15SG based at Mountain Home AFB. Mountain Home AFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise. Coordination with local, state, and federal officials is guided by DODI 1322.28 (please see response to Comment 5).</p>
92	D. Reynolds/ M. Fereday	Public	<p>We have many concerns about the Draft Environmental Assessment on the proposed Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. This draft is incomplete and does not address all the issues of concern. A complete Environmental Impact Statement should be completed allowing more time for investigations, public input and training alternatives.</p> <p>Meg and I grew up in the Treasure Valley and have lived here all of our lives (64 and 59 years respectively). We have grave concerns about the impact of the Air Force's proposed training activities on the quality of life in Boise as well as the surrounding environment. Boise has been seeing rapid growth, infrastructure problems, and air quality concerns. This proposal would impact us directly and we do not support this proposal.</p>	S. Robertson	
93	D. Reynolds/ M. Fereday	Public	<p><u>Our list of concerns include:</u></p> <p>Noise pollution - (Averaging noise over a 24 hour period should not be applicable.)</p> <p>Air Quality - (Boise already has air quality issues.)</p> <p>Site - (We do not need more jet trails covering our sky.)</p> <p>Traffic - (Boise already has traffic problems.)</p> <p>Migratory birds - (Many migratory birds fly over Treasure Valley heading south in the winter and north in the spring. These birds are flying at various elevations.)</p> <p>Biological harm – (Effects to wildlife in the area.)</p>	S. Robertson	Please see responses to Comments 4, 8, 19, 51, and 80.

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			Health and Safety Issues - (More air and vehicle traffic. Problems with people suffering PTSD.) Boise tourism- (This proposal could limit Boise as a destination spot.)		
94	D. Reynolds/ M. Fereday	Public	In summary, this proposed training activities has many issues that concern us. We believe this proposal will impact our lives directly. Please look at alternatives and perform a complete EIS. The Air Force has many training sites that do not affect a population of 300,000 people. This training should be done in a simulator or an isolated location away from any cities or towns.	S. Robertson	Thank you for your comment.
95	J. Wheaton	Public	Thank-you for the opportunity to comment on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. I have lived in Boise for 28 years and have grave concerns about the impact of the Air Force's proposed training activities on the quality of life in Boise as well as the surrounding environment. Establishment of the Urban CAS in Boise and other communities represents a significant expansion of the Mountain Home Air Force Base's training range. Such an expansion warrants a more detailed analysis of environmental impacts and alternatives through an expanded NEPA process and full Environmental Impact Statement.	S. Robertson	Please see response to Comment 19 .
96	J. Wheaton	Public	Noise: The Air Force's use of noise averaging over a 24 hour period (DNL) and conclusion that there is no significant impact is irrelevant. The noise impacts are from the individual sorties at the time of the activity. The Air Force does acknowledge that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single training event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. And this may occur on 160 days of the year! The noise duration for these events is in no way comparable to that of commercial airliners. It is more disruptive and	S. Robertson	Please see response to Comment 8 .

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			the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities. In Tables 3-5 and 3-6 the Air Force shows the SEL (sound exposure level) of four-aircraft formations to be 70.8 dBA and 72.3 dBA for the F-15E and F-15SG respectively. This is stated to be well below the 90 dBA SEL threshold for sleep interference. The needs of people with sleeping disorders and challenges need to be taken into account when considering noise levels that are found to be disruptive.		
97	J. Wheaton	Public	There will very likely be the occasional “fly boy” that launches their after burners at lower altitudes and/or breaks the sound barrier above the city. These bad apples will only add to the noise disruption that is expected. Even though it is not permitted, it still happens. I have been in the Owyhee and Steens Mountain areas where occasional fighter jets blow by at low altitudes and break the sound barrier, startling visitors enjoying these remote areas and disturbing the fauna that have to live there. Can we expect this over Boise? How can this be assured these infractions won’t happen? Why does this keep happening when it is not supposed to in sensitive wild areas? Who will enforce? This is not the “cost of freedom” it is a cost we should not have to live with.	S. Robertson	Sections 2.1 through 2.1.6 of the EA detail the activities that would be conducted for the proposed Urban CAS training. The training would not require or involve supersonic flight. Please see responses to Comment 16 regarding information on compliance with the EA. Also, Mountain Home AFB Public Affairs Office can be contacted at 208-828-6800 for any complaints. This information is available to the public. Mountain Home AFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise.
98	J. Wheaton	Public	Air Quality: Boise has significant air quality issues, particularly during the winter when inversions trap pollutants in the valley and during the summer when winds frequently bring smoke from wildfires into the region. We do not need additional pollutants that are unnecessary. This is becoming a significant health issue for many residents of the valley. The Air Force should be precluded from training exercises in the region during periods when the air quality is poor.	S. Robertson	Please see response to Comment 19 . Also, Section 3.2.3.1 of the EA details the air quality modeling analysis conducted to assess emissions levels anticipated from the proposed training activities. The Air Force’s Air Conformity Applicability Model was used to estimate the total direct and indirect emissions from the Proposed Action Alternative, which have been compared to <i>de minimis</i> thresholds for air pollutants to determine the level of impacts. Results of the analysis indicated that air emissions

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					from the proposed flight operations would be below the <i>de minimis</i> threshold of 100 tons per year of each pollutant in all areas; therefore, impacts would be minor.
99	J. Wheaton	Public	Furthermore, the EA states that there will be no net increase in greenhouse gas emissions as a result of their training range expansion because they are offset by reductions in emissions associated with current training exercises. However, this fails to account for increased travel distances for training which will result in the burning of more fuel and a net increase in emissions. Training locally and training in dispersed areas cannot be equated on a one-to-one basis.	S. Robertson	Section 3.2.3.1 of the EA details the air quality modeling analysis conducted to assess emissions levels anticipated from the proposed training activities. The Air Force's Air Conformity Applicability Model was used to estimate the total direct and indirect emissions from the Proposed Action Alternative, which have been compared to <i>de minimis</i> thresholds for air pollutants to determine the level of impacts. Results of the analysis indicated that air emissions from the proposed flight operations would be below the <i>de minimis</i> threshold of 100 tons per year of each pollutant in all areas; therefore, impacts would be minor.
100	J. Wheaton	Public	Health and Safety: The Air Force's plan for safety is to not have any accidents. We all know that is an impossibility – accidents happen and flying complex military jets loaded with fuel over densely populated areas greatly increases the catastrophic impacts of an inevitable accident. If problems arise, pilots are allowed to jettison their fuel over 'unpopulated areas'. Is that the Boise Foothills, Bogus Basin or perhaps the desert south of town where people go to recreate? There is nowhere within the training circle around Boise that is not inhabited or used by local residents so where will they jettison their fuel if the unexpected happens and a pilot suddenly needs to lighten his/her load?	S. Robertson	Please see response to Comment 66 .
101	J. Wheaton	Public	The EA describes the emergency services available from the impacted municipalities. Why is it their responsibility to deal with the mishaps from the Air Force? Does the Air Force intend to provide additional funding to communities for enhanced emergency services to deal with an Air Force caused disaster?	S. Robertson	Please see response to Comments 13, 14, 42, and 66 . Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).

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102	J. Wheaton	Public	We now live with increased fire danger as we experience lengthened and more frequent droughts. An accident in our foothills would devastate the City population with a wildfire. The source of ignition from a down jet would be very difficult to extinguish with existing fire suppression devices designed for wildfires today. Will there be additional firefighting resources made available to address this?	S. Robertson	Please see response to Comments 13, 14, 42, and 66 . Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).
103	J. Wheaton	Public	Similarly, the Air Force contends that the ‘eye-safe’ lasers used in their training operations won’t cause any harm as long as it has been properly put into the ‘training’ mode as opposed to the ‘combat’ mode. Again, the finding of no significant impact is based on the assumption that an error will never occur. Are citizens expected to gamble their vision on the belief that the military never makes a mistake?	S. Robertson	Please see response to Comment 14 .
104	J. Wheaton	Public	And finally, there is the simple fact that as Boise continues to grow the airport has also continued to expand operations and add commercial flights. The addition of Air Force training exercises will only exacerbate the problems of growth and increase the risk of a disaster resulting in the loss of life.	S. Robertson	Please see response to Comments 13, 14, 42, and 66 . Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).
105	J. Wheaton	Public	Environmental Justice: The EA does not evaluate issues of Environmental Justice, dismissing concerns from the outset based on their assertion that noise impacts averaged over a 24-hour period are negligible. However, they did not consider the affect of the noise and visual displays of fighter jets on people suffering from PTSD. This group includes not only veterans but also many of the refugees now living in Boise who have come here to escape violence and war in their home countries. The adverse impact of Air Force activities on these vulnerable residents of our community need to be given serious consideration in an EIS.	S. Robertson	Please see response to Comment 19 .
106	J. Wheaton	Public	Biological Resources: The EA is also dismissive of impacts to biological resources. While there are no direct disturbances on the ground, the assertion that there are no impacts to wildlife is erroneous. The impact of increased noise levels, particularly at night when it is otherwise relatively quiet, need to be more thoroughly examined. Potential disruption to the behavior of sensitive nocturnal	S. Robertson	Please see response to Comment 19 .

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			species such as bats and owls should be considered in an EIS. The EA also discounts impacts to migratory birds by claiming that since the overall number of air operations will remain the same, the impacts of Air Force training activities are also the same. This ridiculous assertion completely ignores the fact that the proposed activities will impact a different geographic area and therefore have the potential to disrupt other corridors for migratory birds. The Intermountain Bird Observatory located to the east of Boise (Lucky Peak) and within the training circle is an example of the types of areas adversely impacted by this proposal. A comprehensive analysis of migratory corridors within the expanded training area needs to be conducted.		
107	J. Wheaton	Public	In summary, the proposed training activities have the potential to significantly impact the local environment and quality of life, health and safety of the citizens of Boise. Before moving forward with the proposed actions, a thorough analysis of impacts and training alternatives must be conducted in an Environmental Impact Statement. I urge you to conduct an Environmental Impact Statement.	S. Robertson	Please see response to Comment 19 .
108	J. Newton	Public	I was aware of your past public meetings but did not attend. Now that I see you are facing opposition, I wanted to support the AF's decision to go forward with the urban training. I am proud of the military and its members and am grateful Boise can help in this small way their preparations.	S. Robertson	Thank you for your comment.
109	J. Fauci	Public	Please accept my new comments on this issue as well as my previous comments below. I attended both the April 13 and the May 2 meetings at the library. I am not in agreement with the determination of a Finding of No Significant Impact (FONSI). I believe the people of Idaho, and Boise in particular, deserve more, a full EIS review! Any increase in military air flights over Boise IS a Significant Impact! We recreate outside. We dine outside. We converse outside. Boise tries to lure new, clean businesses to town. Who wants to come and have their conversations interrupted 160 times a day, 260 days a year (see numbers below, new numbers are somewhere between 160, 240, 400, and 624, it's very confusing)? None! So besides a quality of	S. Robertson	Please see response to Comment 19 .

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			life issue, this is an economic issue.		
110	J. Fauci	Public	If the planes fly high enough that we aren't going to hear them, why do they need to fly anywhere near our urban canyons/vertical developments? This can all be simulated, along with the applicable lighting. The lighting is probably better simulated electronically than actually so that all variations can be achieved. And for much cheaper. I don't think the simulations are given enough credit. This is the future of the military, simulated and electronic, not live people flying live planes. It would also prevent accidents (in the air and on the ground) and not worsen our already sketchy air quality. Simulated flying rather than actual flying is the true FONSI.	S. Robertson	Please see response to Comment 4 . Reliance upon Mountain Home AFB's installation airspace and range complex areas for the proposed training would not satisfy the purpose and need for the Proposed Action. Please see Sections 1.5 and 2.4 for details.
111	J. Fauci	Public	The "alternatives considered but dismissed" in the EA, section 2.5 gives me cause to wonder. Why is this needed for Mountain Home? Why can't the crews at the other bases do this? They are located near large urban areas. The Air Force does not need to be practicing these war games all over our country, with all types of aircraft. It takes me back to my other argument that these things need to be practiced in simulation, not over our citizens.	S. Robertson	Please see response to Comment 4 . Reliance upon Mountain Home AFB's installation airspace and range complex areas for the proposed training would not satisfy the purpose and need for the Proposed Action. Please see Sections 1.5 and Section 2.4 for details.
112	J. Fauci	Public	When will these exercises end? If there are issues or problems, how does the public or city governments take action for a review or halt of the exercises?	S. Robertson	The 366 Fighter Wing (FW) Range Operations Office will monitor air operations for EA compliance. The information can be requested through the 366 FW Public Affairs Office (208-828-6800).
113	J. Fauci	Public	During the April and May meetings it was clearly stated that only the US/Mountain Home crews would conduct these exercises. Now it appears that the Singapore crew (F15 SG) will also be involved. I'm not sure Boise, Idaho, or the rest of America is willing to sacrifice our cities for training of foreign militaries. I have nothing against Singapore but we have no guarantee that next year the F15 SG crew might be from somewhere else.	S. Robertson	Please see response to Comments 4, 6, 13, and 42 .
114	J. Fauci	Public	I am still highly suspicious of F35s coming to Boise. This EA and/or EIS should be clear that NO other plane besides a F15 can perform this activity.	S. Robertson	Section 2.1.1 of the EA specifies the aircraft that would be used to conduct the proposed aircrew proficiency training. As stated in Section 3.1.3 (page 3-9), clearly

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					states that “if aircraft other than F-15E or F-15SG are flown during Urban CAS training in the future, either near Mountain Home AFB or over other urban centers, subsequent NEPA analysis and comprehensive noise modeling would be required to specifically address potential noise impacts of those activities.”
115	J. Fauci	Public	At the spring meetings several people commented that the ground crews should be wearing obvious clothes and driving marked vehicles. I too believe this is a good idea. Since it's only an exercise it's not like they'd be tipping off the enemy. If instead they were obvious, people might not be concerned when they see the JTAC crew running down the street.	S. Robertson	Please see response to Comment 4 .
116	J. Fauci	Public	Where is the EA and/or EIS for JTACs? I hope what is mentioned in this document is not all we're expected to accept. At the spring meetings the Air Force personnel present didn't even know who the JTAC were. How can they be held accountable for anything? I'm afraid there will be vehicle accidents and they won't be held accountable. We need more information about this part of the project. I do appreciate the Air Force people who held the spring meetings and have prepared this EA. It's more then we've seen from the JTAC side of the project.	S. Robertson	Section 2.1.5 specifies the operational activities that would be conducted by ground support personnel. As noted in the response to Comment 16 , the 366 Fighter Wing Range Operations Office will monitor air operations for EA compliance. The information can be requested through the 366 Public Affairs Office (208-828-6800).
117	J. Fauci	Public	If the Air Force still wants to pursue this exercise, I request a full EIS with inclusion of the JTACs impact	S. Robertson	Please see response to Comment 19 .
118	C. Loucks	Public	I do not support the conduction of urban war games in Boise, ID. I live within three miles of the Boise airport. When the Air Force or National Guard conduct training exercises in Boise, I am adversely affected by the noise. The early morning and late night training runs wake me up; when I'm walking in the neighborhood or on the Greenbelt, the noise from the flights destroys the peace and quiet of my walks. I am also concerned about adverse effects on air quality in Boise. We already have increasingly bad air quality due to increased congestion	S. Robertson	Thank you for your comment. Please see responses to Comments 8 and 19 . Also, Section 3.2.3.1 of the EA details the air quality modeling analysis conducted to assess emissions levels anticipated from the proposed training activities. The Air Force's Air Conformity Applicability Model was used to estimate the total direct and

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			and smoke from fires. I support conducting an environmental analysis that considers all of the costs imposed on residents of the Treasure Valley before any decision is made regarding the plan to conduct urban war games in the Treasure Valley is feasible.		indirect emissions from the Proposed Action Alternative, which have been compared to <i>de minimis</i> thresholds for air pollutants to determine the level of impacts. Results of the analysis indicated that air emissions from the proposed flight operations would be below the <i>de minimis</i> threshold of 100 tons per year of each pollutant in all areas; therefore, impacts would be minor.
119	R. Guerrero	Public	<p>I am employed by the Idaho Department of Environmental Quality as a Security Supervisor. I receive approximately 75 calls per day from citizens regarding environmental health issues. When air quality is bad, this call rate increases to 250 calls per day or more. I frequently hear from sensitive populations such as school groups, athletic directors, seniors, and people with asthma and COPD who need to know if it is safe to exercise or even go outdoors. People who are looking to move into the Treasure Valley also call to ask questions about the air quality, and when they hear how frequently the Air Quality Index indicates hazardous levels, they look for other places to live.</p> <p>Treasure Valley has serious air quality issues. It gets so bad every year that sensitive populations have to move out of town. With these and other air pollution issues being a major concern in the Treasure Valley, I am strongly opposed to the redistribution or addition of additional on-road and non-road mobile air pollutant sources. The increased military aircraft activity will increase the pollutant load to Treasure Valley.</p> <p>Due to potential air quality impacts, I am opposed to the Finding of No Significant Impact (FONSI) for the <i>Environmental Assessment addressing Establishment of Urban Close Air Support Air and Ground Training Spaces in Urban Centers in Idaho</i>. There has not been an adequate analysis of the air pollutant impact of the proposed air and ground training in urban centers.</p>	S. Robertson	<p>Thank you for your comment. Please see the responses to Comments 19, 99 and 118. Also, Section 3.2.3.1 of the EA details the air quality modeling analysis conducted to assess emissions levels anticipated from the proposed training activities. The Air Force's Air Conformity Applicability Model was used to estimate the total direct and indirect emissions from the Proposed Action Alternative, which have been compared to <i>de minimis</i> thresholds for air pollutants to determine the level of impacts. Results of the analysis indicated that air emissions from the proposed flight operations would be below the <i>de minimis</i> threshold of 100 tons per year of each pollutant in all areas; therefore, impacts would be minor.</p> <p>Additionally, because the Urban existing CAS flight operations at Mountain Home AFB, which occur at the operating level proposed in the EA, would be redistributed across the nine urban centers identified as adequate to support the proposed training, GHG emissions would not appreciably change in the region.</p>
120	C. Owings	Public	I live in the flight path for the Boise airport. I was born here. I've lived	S. Robertson	Thank you for your comment. Descriptions

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			<p>in Boise my whole life.</p> <p>I OBJECT TO THESE MILITARY EXERCISES AND I DO NOT WANT THEM TO CONTINUE.</p> <p>These military jets have been flying over my house day after day and I have had it. You said there wouldn't be much additional noise but there is. There is A LOT of additional noise. Stop lying to people.</p> <p>Also, being a mock target for the United States Air Force DOES NOT make me feel safe. The friends, family, and coworkers I have discussed this issue with agree with me. We do not want this happening over our city.</p> <p>I know this is mostly a charade. You will likely ignore the people for whose opinions you're asking, but I've said my piece. I know I'm not alone. Do the right thing and stop these exercises.</p>		<p>of the proposed air and ground training activities are detailed in Sections 2.1 through 2.1.6 of the EA. Please see the response to Comment 19. Mountain Home AFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise.</p>
121	J. Westover	Public	<p>I am against the jets flying so low over Boise. I don't believe the noise won't be out of control. Please consider my opinion and don't fly jets over the small city of Boise.</p>	S. Robertson	<p>Thank you for your comment. The proposed Urban CAS training is not currently conducted outside of the installation and associated range complex. An Environmental Assessment for this action was completed in accordance with NEPA. In accordance with the DODI 1322.28, Mountain Home AFB would coordinate with local, state, and federal authorities. Mountain Home AFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise.</p>
122	B. Didjs	Public	<p>This operation is complete crap. It's made Boise into a warzone. IT NEEDS TO STOP. It disrupts businesses and civilian life. When rumbling jets are to close overhead, it's deafening. People with hearing problems of any kind are greatly impacted. Those with perforated ear drums go through physical agony.</p>	S. Robertson	<p>Thank you for your comment. The proposed Urban CAS training is not currently conducted outside of the installation and associated range complex. An Environmental Assessment for this action was completed in accordance with NEPA. In accordance with the DODI</p>

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					1322.28, Mountain Home AFB would coordinate with local, state, and federal authorities. Mountain Home AFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise.
123	S. Zipporah	Public	I am strongly opposed to having these war games happen in my hometown & current residence Boise, Idaho. This will be dangerous to the mental & emotional health of vets, refugees, pets, children, & frankly, myself. Please do not approve this proposal!	S. Robertson	Thank you for your comment
124	J. Saenz	Public	I am writing in opposition of conducting training exercises in the Boise Metropolitan area. While I fully support our military, Boise is already one of the noisiest cities I've lived in. I know reports say these operations will have minimum impact on our environment - but the quality of life reduction that F-35 testing had on my neighborhood during short test left me seriously considering leaving Boise. Boise is growing quickly and it's my opinion, that it's economic development is only hindered by military activities in the area.	S. Robertson	Thank you for your comment. As specified in the EA, the proposed Urban CAS aircrew proficiency training would involve flight of F-15E and F-15S/G aircraft over any one of the nine urban centers identified as adequate to support the training. Operational parameters are provided in Sections 2.1 through 2.1.6 of the EA. Flights would be conducted at altitudes ranging between 10,000 feet above ground level and 18,000 feet above mean sea level. Please see response to Comment 8 for more information about the noise analysis conducted for the EA.
125	T. Tafelmeyer	Public	I would like to make my position known that I am opposed to the Air Force running military training missions over Boise. The trainings affect my mental health, and disrupt the quality of life in our great city.	S. Robertson	Thank you for your comment.
126	B. Pori	Public	I would not object to the proposed war games if some procedure could be enacted that would diminish the noise levels of the F15s when they are taking off and doing their initial climb. Couldn't they head south after taking off and gain altitude over the southern desert areas so the residential areas of East Boise would be	S. Robertson	Thank you for your comment. As explained in the EA, Urban CAS aircrew proficiency training is currently only conducted at Mountain Home AFB installation and range complex. Under the proposed action,

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			spared the ear-splitting noise levels of these planes during the take off and the initial climb? As they are currently executing these maneuvers, their noise levels are much too high to endure over our residential area.		Mountain Home AFB F-15E and F-15 S/G aircraft would take off/land from Mountain Home AFB. They would not use regional airports during the proposed training.
127	A. Bates	Public	All for it, proud that you can use Boise for these games. Best of luck	S. Robertson	Thank you for your comment.
128	J. Wallace	Public	I think most Boiseans would be okay with this if the frequency of the exercises would not be every day, every week. How about one day a week, at times we know about in advance?	S. Robertson	Thank you for your comment. In accordance with the DODI 1322.28, Mountain Home AFB would coordinate with local, state, and federal authorities.
129	C. Regilski	Public	I would not like additional noise from jet training over Boise, Idaho.	S. Robertson	Thank you for your comment.
130	T. Brow	Public	Oh this is why the jets have been doing burnouts over my household! I was wondering why I was having to pause my phone conversationsbtw I work from my home and pay my taxes. Don't we have perfectly good air force Base in Mountain home? If you ask me this is absolutely poor planning and a waste take it to Mountain Home that's where it belongs that community needs the development!	S. Robertson	Thank you for your comment. The proposed Urban CAS training is not currently conducted outside of the installation and associated range complex. An Environmental Assessment for this action was completed in accordance with NEPA. In accordance with the DODI 1322.28, Mountain Home AFB would coordinate with local, state, and federal authorities. Mountain Home AFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise.
131	C. Owings	Public	My first email was a very emotional response to how I feel about the military exercises over Boise. My friend said it better. This is how I feel: "When I hear the jets overhead, which happens on occasion, and see them heading somewhere, there is a visceral reaction. Since it is an anomaly to see a military presence unless it is a parade or in a zone designated, the anxiety that "something is wrong" kicks in. These are not exactly tame times and, regardless of how benign the intent, seeing weapons of war engaged over a municipality adds to the	S. Robertson	Please see response to Comment 4 . Reliance upon Mountain Home AFB's installation airspace and range complex areas for the proposed training would not satisfy the purpose and need for the Proposed Action. Please see Sections 1.5, 2.2, and 2.4 for rationale.

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			national tension. There is also the underlying feel that the government feels the need to reinforce its power and position, which I greatly dislike. I have yet to hear why there cannot be some shell buildings in the desert that emulate the heart of the city. An entire shell building scape would be less than the cost of one jet." This is why I object to the USAF exercises over my city.		
132	S. Paden	Public	I live in Boise and love the mountain quiet in this growing town. The introduction of F-15s is not only a marked change in our environment but a categorical shift in Boise noise pollution. Do NOT bring these jets to Boise.	S. Robertson	Thank you for your comment. Please see response to Comment 8 .
133	A. VanDeGrift	Public	I am writing in regards to your proposal to carry out fighter jet training over Boise, ID. Please do not move forward with this plan. The thing that makes Boise a good place to live is its proximity to wildlife and outdoor activities. To introduce fighter jet training exercises to Boise will disrupt flight patterns to the many birds of prey who migrate through and disrupt this peaceful place. I have family who lives in an area where training takes place and it is a huge disruption. This is not an ideal area for your training exercises.	S. Robertson	Thank you for your comment.
134	K. Sather-Smith	Public	My husband and I along with numerous friends do NOT want ANY new jet or helicopter training missions over the city of Boise. The other day the windows in our house were shaking as AF jets flew over and then numerous helicopters flew directly over. No thank you, we don't want the jets here. I appreciate your consideration of how these training missions would directly affect our quality of life in a significant way.	S. Robertson	Thank you for your comment.
135	M. Alton	Public	I am a homeowner and parent of 2 children in Boise, Idaho and I oppose any war games trainings that utilizes the community's shared air space over our city.	S. Robertson	Thank you for your comment.
136	A. Almerico	Public	I have owned my home between vista avenue and federal way for nearly 17 years. I love the sound quality I can appreciate, even being near(er) to the airport and highway than many. Boise and its engineers have been thoughtful and respectful about this in the past. This idea of adding these tests to Boise is obnoxious. I am extremely opposed.	S. Robertson	As explained in the response to Comment 64 , flights associated with the proposed Urban CAS training would take off and land at Mountain Home AFB. They would not use regional airports during the proposed training. The proposed Urban CAS training

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					is fully described in Sections 2.1 through 2.1.6 of the EA.
137	C. Krieg	Public	Please no war games over the city of Boise, ID. There is plenty of area out in the Owyhee's that you can use.	S. Robertson	Thank you for your comment. Section 2.2 details the selection standards which specify the operational requirements that must be met to adequately support the proposed Urban CAS aircrew proficiency training. Reliance upon the installation airspace and range complex areas would not satisfy the purpose and need for the Proposed Action. Please see Sections 1.5, 2.2, and 2.4 of the EA for rational.
138	T. Crawford	Public	I fully support the proposed training.	S. Robertson	Thank you for your comment
139	M. Wade	Public	I am in favor of these training exercises taking place over Boise, ID.	S. Robertson	Thank you for your comment
140	N. Moore	Public	I am appalled to hear about the proposal to approve the use of the skies and combat units above and within urban areas to simulate war tactics. I am opposed to this proposal. I feel that this will directly impact my safety. I am concerned that a situation wherein military craft and personnel are conducting raids and simulated warfare within urban areas with dense populations will create a hostile environment. I disagree with the findings of the Environmental Impact. I think there would be a huge impact, both to the physical and to the psychological wellbeing of residents within urban centers chosen, if this measure were to be passed. I am not in support of this proposal and have faith that it will not be passed. If anything, please conduct further analysis and give the public a full year to assess this proposal. And, conduct further analysis regarding the full impact on the environment.	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
141	D. Freeman	Public	No! Please no! We have veterans and babies and pets. We love our fairly tranquil city. I understand the reasons, but this would be noise pollution. Please find another place.	S. Robertson	Thank you for your comment. Please see response to Comment 8 .
142	N. Walsh	Public	Not interested in hearing these booming jets fly over our city.	S. Robertson	Thank you for your comment

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143	M. Sapiro	Public	I live in Boise, ID and do NOT want AF training missions in our city. Although I support our military and have worked as a contracted civilian psychologist with the Air Guard there are too many children, animals, and people living with PTSD (many veterans) for low-flying trainings to be safe for our community. Please do not allow this training to happen here.	S. Robertson	Thank you for your comment. Please see responses to Comments 8 and 19 .
144	S. McDonald	Public	I would like to address the permanent training exercises between plain clothes air men and the Fighter planes you intend to use in Boise, Idaho, for training. I am vehemently opposed to this action, as are my adult children. I understand comments are still being taken until October 20th. Please use my vote for NO, in your deliberations.	S. Robertson	Thank you for your comment
145	A. Davis	Public	Please proceed, hopefully you will fly low over my neighborhood. I must admit I am a fan of the aircraft and enjoy seeing my tax dollars at work.	S. Robertson	Thank you for your comment
146	C. Coltrin	Public	Please do, use Boise as the training grounds! I am always so proud to show my sons the jets at warthogs as they fly by! My young sons are in constant awe of the military and their equipment. And i couldn't be prouder to have them practicing here in our city!! Keep it up!	S. Robertson	Thank you for your comment.
147	V. Cathey	Public	I understand the need for training, however the noise is just too much. I will lose my work from home position if this is done. Please do not include Boise in this training—the noise level is unbearable!	S. Robertson	Thank you for your comment. Please see response to Comment 8 .
148	R. Healea	Public	I'm all for it. It's the least the public can do to support our military. We already have military flights happening and commercial planes constantly coming and going. I believe most people in Boise appreciate seeing military planes training overhead.	S. Robertson	Thank you for your comment.
149	J. Ellenberger	Public	Please don't allow this noise pollution to continue. It's bad enough that America is destroying lives and countries all over the world. I don't want to have to hear them practicing ruining more people's lives. If it has to be done, (which it doesn't, but the powerful war machine will never stop until it destroys itself) why not somewhere more remote, like Mountain Home or better yet further away. Please listen to the people. We don't want this in our city!	S. Robertson	Thank you for your comment. Thank you for your comment. Please see response to Comment 4 . Also, reliance upon the Mountain Home AFB's airspace and range complex areas for the proposed training would not satisfy the purpose and need for the Proposed Action. Please see Sections

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					1.5, 2.2, and 2.4 for details on the training requirements for the Proposed Action.
150	A. McKinley	Public	We need fewer military jets flying near our homes and cities, not more. They are already a nuisance. I understand that public comment doesn't actually matter, and that this is a waste of time, but this is an activity that will negatively impact our cities.	S. Robertson	Thank you for your comment.
151	A. Quatman	Public	I am fully opposed to the urban war games over the city of Boise that the Air Force plans to conduct. The nature of it is disturbing, and the potential for unforeseen problems too great a risk.	S. Robertson	Thank you for your comment.
152	T. Hastings	Public	I'm fully opposed to the Air Force's attempt to use Boise as a training ground to fly, at any altitude, its Fighter Jets. As it is now, the military planes I've seen and heard are a nuisance. They are more appropriate near the Air Force base in Mountain Home.	S. Robertson	Thank you for your comment.
153	K. Sinclair	Public	<p>I am greatly disturbed by the intent to turn Boise into a city where mock war games are conducted, with fighter jets overhead and people in civilian clothing acting out bombing and war scenarios. Regardless of the "footprint" or intent, the action of this at all seems like a deep violation of the sanctity of our cities. I'm not even a veteran and this sounds traumatic. Seeing fighter jets over a city instantly evokes anxiety and panic. There is no way for every person to know when it is mock war or a real issue. Saying the sound will "hardly be impacted" is vague. What is "hardly"? Like there is no way anyone could hear it at all? Or there is a ton of sound, but it is infrequent?</p> <p>Unless the jets are invisible, they are going to be noticed. Nobody is psychic and knows what is really going on. So it's a lot more shocking than is being suggested. Especially if there is mock war maneuvering. There are miles and miles of desert. Build some fake buildings out there.</p> <p>That's like me saying "I'm going to practice some mock cyber warfare on everyone's systems. The data I steal and the fake stuff you get, along with popups saying I'm going to take all your personal information unless you pay me, followed by a 'just kidding' is totally fine. Don't worry. You'll have to figure out if it's real or not, but just</p>	S. Robertson	Thank you for your comment. Thank you for your comment. Please see response to Comment 4 . Also, reliance upon the Mountain Home AFB's airspace and range complex areas for the proposed training would not satisfy the purpose and need for the Proposed Action. Please see Sections 1.5, 2.2, and 2.4 for details on the training requirements for the Proposed Action.

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			know that some of the time, I'm going to be in there, poking around and being noticeable." Not okay.		
154	J. Rae	Public	Good training is critical.	S. Robertson	Thank you for your comment.
155	J. Max	Public	<p>I am contacting you to protest the Urban Close Air Support at Mt Home air base in Idaho.</p> <p>Please count my vote against such an unwarranted and misguided adventure. It is quite simply not anything we need and is therefore a monumental waste of time and resources.</p> <p>I appreciate you taking note of this objection.</p>	S. Robertson	Thank you for your comment.
156	J. Robison	Id Conservation League	<p>Thank you for considering our comments on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters who have a deep personal interest in ensuring that military training projects are designed to avoid, minimize or mitigate impacts on public health, quality of life, and wildlife.</p> <p>The Draft Environmental Assessment (EA) is required to disclose the environmental effects of Urban Close Air Support air and ground training spaces near Mountain Home Air Force Base. The document describes a series of training measures in large, medium and small urban centers in southwest Idaho. However, this document does not go into sufficient detail into the actual environmental effects of the proposed action.</p> <p>We believe that a full Draft Environmental Impact Statement may be necessary. In addition, the Air Force may need to develop additional alternatives to address concerns and issues raised by the public.</p>	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
157	J.	Id Conservation	Public safety: As mentioned in our scoping comments, we recommend that the Air Force ensure that public safety is fully	S. Robertson	Department of Defense Instruction (DODI) 1322.28, <i>Realistic Military Training off</i>

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	Robison	League	protected during military training exercises. Members of the public may become concerned about unidentified ground support team members and mistake training activities as a real security threat, exposing members of the public and ground support personnel to harm and mental stress. Please describe in additional detail how such scenarios will be handled and what types of coordination will occur with municipalities and local and state law enforcement agencies.		<i>Federal Property</i> , requires ground support teams to operate in accordance with local, state, and federal regulations. The DODI establishes procedures for coordinating with local law enforcement. Local law enforcement are not expected to expend additional time on coordination.
158	J. Robison	Id Conservation League	Human health and wellbeing: The Air Force failed to sufficiently analyze the potentially negative health impacts of noise on humans, particularly with respect to sleep, overall quality of life, and ability to enjoy outdoor activities. Increased air pollution could also result in adverse health effects.	S. Robertson	Thank you for your comment. Please see response to Comments 19, 51, and 99 .
159	J. Robison	Id Conservation League	Wildlife impacts and monitoring: With respect to wildlife, the DEA states that “[n]oise levels associated with the Proposed Action would not be of sufficient magnitude to result in the direct loss of individuals or reduce reproductive output.” We wish to point out that noise may have sublethal or other indirect effects that end up reducing reproductive output or displacing individuals or local populations. Species of concern include bighorn sheep, sage-grouse, raptors, sage thrashers, and sage sparrows. In addition, pet dogs may also be negatively affected. The Air Force should expand the section on noise impacts to wildlife and incorporate a comprehensive monitoring program before, during and following activities.	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
160	J. Robison	Id Conservation League	Alternative development: Overflights should be suspended during winter inversions when air quality is already poor.	S. Robertson	Thank you for your comment. Please see response to Comment 99 .
161	J. Robison	Id Conservation League	Ending date: The Air Force also needs to adopt an end date at which this program will be concluded. We recommend establishing a 2-year trial period at the end of which the program will be reanalyzed with additional public input.	S. Robertson	Thank you for your comment. Please see response to Comment 36 .
162	J. Robison	Id Conservation League	Cumulative effect: We recommend expanding the cumulative effects analysis to better address the recent population growth in the Treasure Valley as well as increased levels of air pollutants.	S. Robertson	Thank you for your comment. The analysis approach for Cumulative Effects is provided in Section 4 of the EA.

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			Once again we thank you for the opportunity to submit comments on this project. Please send us any subsequent documents for this project.		
163	G. Wozniak	Public	An Environmental Impact Statement must be prepared to fully assess the environmental impacts of this proposed permanent program that would include up to 160 training events per year for an unlimited number of years .	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
164	G. Wozniak	Public	The exercises must be limited to U.S. military aircraft. It is unacceptable that one-third of the proposed exercises will be conducted by foreign military aircraft. Idaho cities should not be used as combat training grounds for hire by foreign military forces.	S. Robertson	Thank you for your comment. Please see response to Comment 4 .
165	G. Wozniak	Public	USAF needs to set up a system for monitoring compliance with the proposed mitigation measures (including but not limited to number of sorties, flight altitudes, takeoff and landing locations, and locations of operations on the ground). Records must be publicly available.	S. Robertson	Thank you for your comment. Please see response to Comment 16 .
166	G. Wozniak	Public	The program needs to be evaluated with affected municipalities on an annual basis, with a comprehensive environmental review after five years to assess the cumulative impacts in light of changed conditions in southern Idaho.	S. Robertson	Thank you for your response. Please see response to Comment 16 .
167	G. Wozniak	Public	Any troops on the ground must be in uniform so they are easily identified by members of the public.	S. Robertson	Thank you for your comment. Ground operations would be conducted as described in Section 2.1.5 of the EA.
168	K. Railsback	Public	Thank you for this opportunity to submit comments. I am opposed to the U.S. Air Force's proposal to establish a roughly 175-mile Urban Close Air Support (CAS) Air and Ground Training Zone in southern Idaho. Name of Proposal is Misleading. Although the title of the proposal refers to "Training Spaces near Mountain Home, Idaho," in fact when the proposed training spaces are considered together, they form virtually a contiguous stretch of roughly 175 miles stretching from Burley to Nampa, Idaho.	S. Robertson	Thank you for your comment.
169	K.	Public	Moral Objections. I am writing as a Mennonite and Christian because I believe that bombing densely populated areas is morally	S. Robertson	Thank you for your comment.

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	Railsback		wrong. I have worked with refugees from wars and conflict zones for nearly 40 years, beginning with refugees from the Vietnam War in the 1970s until today, working with people who have survived traumatic experiences in Afghanistan, Iraq, Syria, Somalia, and other conflict zones. I strongly believe that we need a new strategy beyond using bombing to “shock and awe” and intimidate, and that we cannot bomb our way to peace. I believe we need to look at the underlying causes of conflict, which often include poverty, food insecurity, corruption, and other systemic problems. Even though these issues are difficult and time-consuming to address, in the long-run addressing these underlying problems will be more effective in producing lasting solutions and in enhancing America’s security. Moreover, I believe it is likely solutions to these issues could likely be achieved at a smaller cost than is spent on military aircraft and sophisticated weapons systems – and with much less suffering on the parts of both U.S. and foreign people involved.		
170	K. Railsback	Public	Psychological Damage to Military Servicepersons and Area Residents. Implementation of this proposal would “normalize” simulated urban combat and bombing in American cities. Practicing high-stakes warfare in one’s own home country, and coming to view persons in one’s own country, even one’s own state or city, as “hostile threats” is not healthy psychologically for the military personnel involved. Similarly, having the constant presence of military aircraft overhead could be psychologically damaging for returned veterans, who very well could be in need of respite after multiple tours of duty, or for refugees who have fled from urban warfare and may have been traumatized by bombing by military aircraft. In addition, the proposed activities also “normalize” urban warfare in general and prepare the pilots for bombing in a densely populated area, with its virtually certain attendant civilian casualties and the possibility of being charged with war crimes. These health and safety issues have not been addressed in the Environmental Assessment.	S. Robertson	Thank you for your comment. The proposed Urban CAS aircrew proficiency training would be conducted as described in Sections 2.1 through 2.1.6 of the EA.
171	K. Railsback	Public	Inadequate Justification for Use of American Cities and Towns for Combat Practice by Foreign Militaries. USAF Has not demonstrated a need for CAS training in American cities by the Singaporean Air Force. A full one-third of the proposed training	S. Robertson	Thank you for your comment. Please see response to Comment 4 . Stakeholders and attendees at the public scoping meetings were informed during the scoping period

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			<p>operations in the proposal will be conducted by the Singaporean Air Force. USAF has not demonstrated a compelling need for this third of the program, such that it would merit putting Idaho cities at risk for additional noise and air pollution as well as an increased risk of possible aircraft crashes. Is this proposal for training of Singaporean pilots being done primarily for economic purposes? Who benefits financially from this arrangement? A separate environmental publication describes how USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. It appears that Singaporean officials are off-shoring their training so that their local residents do not have to suffer from the negative effects of training with the F-15SG's. It appears that this portion of the proposal seems to be essentially using Idaho cities as a "training ground for hire" and exposing Idaho cities to increased risk primarily for financial purposes. Please explain why Singaporean pilots need to practice with U.S. ground troops. Or, will there be Singaporeans working on the ground to practice with Singaporean pilots, given the proposal's references to the need for "integrally linked aircrews and ground support teams (including Joint Terminal Attack Controllers)." Draft FONSI, p. 1. Similarly, the purported need for the proposal is that the "air and ground assets working as one operating unit integrally linked in all communication and coordination efforts to identify, track, and neutralize threats." It should be noted that the stakeholder letter included in the EA fails to make any mention of the training by the F-15SG's and the Singaporean Air Force. This is misleading, if not deceptive, because it does not accurately describe the nature of the proposal, which includes one-third of the flights by a foreign military. Also, it did not give stakeholders adequate notice of the aircraft involved, as the F-15 and the F-15SG have different environmental impacts.</p>		<p>that the Proposed Action would involve flight of both F-15E and F-15 SG aircraft.</p> <p>Please see Section 2.2 for discussion on the selection standards associated with identification of urban centers that could adequately support the proposed training.</p> <p>Please also see responses to Comments 13, 14, and 42. Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).</p>
172	K. Railsback	Public	<p>Other Aircraft That May be Substituted in at a Later Date. Several other foreign militaries operate their own versions of the F-15. Will USAF be bringing in other foreign militaries in the future to use southern Idaho as a "training ground for hire"? What environmental analysis will be done in that event?</p>	S. Robertson	<p>Section 2.1.1 of the EA specifies the aircraft that would be used to conduct the proposed aircrew proficiency training. As stated in Section 3.1.3 (page 3-9), clearly states that "if aircraft other than F-15E or F-15SG are flown during Urban CAS</p>

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					training in the future, either near Mountain Home AFB or over other urban centers, subsequent NEPA analysis and comprehensive noise modeling would be required to specifically address potential noise impacts of those activities.”
173	K. Railsback	Public	Improper Segmentation. USAF needs to perform a comprehensive Environmental Impact Statement so that a comprehensive review can be done of the Cumulative Impacts of several USAF proposed activities in southern Idaho, such as those involving the F-35, the embedding of additional F-15SG aircraft, and expansion of training activities at Mountain Home AFB.	S. Robertson	Thank you for your comment. Please see response to Comment 19 . Please also see Section 4 of the EA for the cumulative impacts analysis approach and list of cumulative actions considered in that analysis.
174	K. Railsback	Public	Previous Use of Boise and Other American Cities for Possibly Unpermitted CAS Training. The EA states that “The Proposed Action is needed because there are no designated urban environments that can be <i>reliably used</i> by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirement.” EA 1-6 (emphasis supplied). It was disclosed at the scoping meetings that USAF in fact conducted unpermitted Urban CAS Training in Idaho cities, apparently for a period of years. The presenter indicated that she had made some effort to determine if such training had been conducted parts of the U.S., but had not been able to identify any similar programs. In order to determine the need for and the cumulative impacts of this proposal, USAF needs to disclose the extent of previous unpermitted use of Boise and any other Idaho cities for CAS training. Also, to clearly evaluate possible alternatives, USAF needs to disclose what other American cities have been used previously for this training. Where have these exercises been done previously and what environmental reviews were done in conjunction with such trainings? Were the cities notified of the training exercises being conducted within their municipalities? What protocols were followed with local law enforcement and the FAA?	S. Robertson	Thank you for your comment. The air and ground spaces designated for such training on military installations are inadequate and are not reliably available for use. Section 2.2 , lists the selection standards and rationale used to identify urban centers that would adequately support the proposed Urban CAS aircrew proficiency training.
175	K. Railsback	Public	Lack of Transparency Regarding the Joint Terminal Attack Controllers. At the two public scoping meetings in Boise, concerned	S. Robertson	Thank you for your comment. Section 2.1.2 of the EA specifies: “Ground support teams

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			local residents asked numerous questions regarding the activities of the ground support teams, including the Joint Terminal Attack Controllers (JTAC) (referred to collectively as JTAC herein). The presenters said (I'm afraid unpersuasively) that they had tried to reach the officials who would be coordinating the JTAC but were not able to contact them to respond to local residents' questions. Who employs the ground support teams? What branch of the military are they in, if in fact they are U.S. military employees. Are they contractors? It is important for the American public to know who is operating essentially secret in American cities. I and many other Idaho residents are strongly opposed to having military personnel operating in hiding simulating urban warfare. For many years, the public has been encouraged: "If you see something, say something." Now we are supposed to ignore 35 persons in civilian clothing and unmarked vehicles operating suspiciously in our cities and towns. The Cover Sheet states, "Realistic Urban CAS training requires that all members of each ground support team behave in a manner typical of any community member to avoid drawing attention to themselves or the operations. Thus, ground support personnel would be unarmed and dressed in plain clothes." Cover Sheet.		would use other active-duty military or military reserves JTAC personnel located near Mountain Home AFB who already operate in conjunction with installation operations."
176	K. Railsback	Public	Infeasibility of Training in Four of the Eight Identified Towns. The EA does not explain how 35 individuals from a ground crew, along with four military aircraft can avoid "drawing attention to themselves" in towns such as Glenns Ferry, population 1,278, Grand View, population 457, Hammett, population 458, or Bruneau, population 552. (Population figures are estimates, from census data at https://www.idaho-demographics.com/cities_by_population and other information available on the internet.) That is, is this training even feasible in those areas if it is a requirement that ground support teams are supposed "to avoid drawing attention to themselves or the operations"? Numerous attendees at the scoping meetings expressed concern about the number of armed households in Idaho and potential risks to the members of the ground support teams. The EA does not address these safety issues, nor does it describe a protocol for working with local law enforcement teams. The EA should discuss the alternative of using existing USAF or other U.S military "mock	S. Robertson	Thank you for your comment. As stated in Section 2.1.2 , "up to" the total number of personnel required for ground support would participate in training activities. Training activities would be conducted as specified in Sections 2.1 through 2.1.6 of the EA.

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			villages” for these training exercises rather than these Idaho towns.		
177	K. Railsback	Public	<p>An EIS should be conducted. 32 C.F.R. § 989.16 (b)(6) states that “Certain other actions normally, but not always, require an EIS. These include, but are not limited to: . . . (6) Establishing or expanding supersonic training areas over land below 30,000 feet MSL (mean sea level).”</p> <p>32 C.F.R. §989.16(a) states</p> <p>(a) Certain classes of environmental impacts normally require preparation of an EIS (<u>40 CFR 1501.4</u>). These include, but are not limited to:</p> <ul style="list-style-type: none"> (1) Potential for significant degradation of the environment. (2) Potential for significant threat or hazard to public health or safety. (3) Substantial environmental controversy concerning the significance or nature of the environmental impact of a proposed action. <p>The present proposal involves training at 10,000 feet, it is permanent, that is, for an unlimited number of years; it covers an enormous expanse of land (roughly 175 miles), a population of roughly half a million Idahoans, and it involves up to 160 days (1400 sorties) of training per year. It is irresponsible for USAF to determine that this project has “no significant impact.” USAF has made a clear error in this determination and should prepare an EIS. This is particularly the case as the proposal is open-ended and does not include any mechanism for reviewing the impacts of the training operations in light of the many changes that will undoubtedly occur in Idaho’s rapidly growing Treasure Valley.</p>	S. Robertson	Thank you for your comment. Please see response to Comment 19 . The proposed Urban CAS training is fully described in Sections 2.1 through 2.1.6 of the EA. The proposed training and would not involve supersonic flight.
178	K. Railsback	Public	<p>USAF has not adequately analyzed the health, safety, and environmental risks to humans or wildlife in its draft. In particular, there are significant discrepancies between the numbers of training events, operations and sorties listed in different sections of the EA, as well as a significant discrepancy in the baseline of operations described in the Description of the Proposed Action and Alternatives (DOPAA) and the EA. Section 2.1.5 of the EA states, Under the</p>	S. Robertson	Thank you for your comment. Please see response to Comment 19 . Section 2.1.5 explains the annual operational requirements associated with the proposed Urban CAS aircrew proficiency training.

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			<p>updated Proposed Action, 160 Urban CAS proficiency training events (involving 400 training operations)) would be expected . . . during surges in preparation for deployment (i.e., surges).” First, does this mean that the F-15SGs will not be participating in these “surges”? How many training operations will be conducted <i>in addition to</i> those conducted during the “surges”? The EA states that during each training operation a maximum of four aircraft would participate. Four hundred training operations, with four sorties per training operation, would result in a total of 1600 sorties per year. Yet Section C.3 (Flight Operations) refers to a combined number of landings and takeoffs of 951 (634 for the F-15E and 317 for the F-15SG). Also, this appears to be for only two aircraft, not four as anticipated? Or does the two refer to the two types of aircraft? Similarly, the noise analysis is based on a calculation of 624 day-training and 336 day-night sorties, (B-3, n. 2) for a total of 960 sorties, whereas the previous section indicates 400 operations with 4 sorties per operation. In minimizing the impact, the EA suggests that the proposed training is essentially moving the CAS training from the AFB to the proposed training zone. Does this mean that the AFB training operations will be reduced accordingly? What are the exact numbers of operations being conducted presently at the AFB? Page 1-4 of the EA states that the baseline total for airfield sorties and operations stands at the AFB is 60,559 per year. It also states that “Annually, approximately 160 training events involving approximately 960 sortie operations are conducted on the installation for Urban CASE training.” However, the Final DOPAA for this proposal states, “The baseline total for flight operations at Mountain Home AFB is approximated at 70,704 operations per year and includes all Mountain Home AF and transient aircraft operations.” The discrepancies between these numbers are widely divergent, making it virtually impossible to accurately assess the impacts of the proposal. Some of the USAF calculations also appear to seriously undercount the proposed number of sorties by at least a third and the number of expected aircraft to be flying sorties. The USAF noise calculations need to be seriously analyzed by independent experts.</p>		
179	K. Railsback	Public	<p>USAF has not adequately consulted with public officials about these risks. Many of the affected cities were not included on the list of stakeholders and the list of state legislators included only two in</p>	S. Robertson	Thank you for your comment. Please see response to Comments 6 and 20 .

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			Idaho and one in Oregon, ignoring numerous legislative districts that are included in the proposed urban combat training zone. In addition, USAF neglected to include the Idaho Department of Environmental Quality on its list of relevant state agencies. USAF either needs to do a comprehensive EIS or re-do its EA with appropriate public process and consultation.		
180	K. Railsback	Public	Inadequate notice. USAF did not follow appropriate notice procedures. While it originally published a notice in the Idaho Statesman, at the time it published the notice, it had not yet publicly released Volume 2 of the EA. Did USAF publish a new notice in the appropriate newspapers (with a new public comment period) after it publicly released Volume 2? This would have given readers an appropriate amount of time to comment. In fact, Volume 2 was not released until an individual stakeholder contacted USAF and requested it, approximately one week after the newspaper notice. As mentioned above, USAF should either do a comprehensive EIS or re-do its EA with appropriate notice.	S. Robertson	<p>Thank you for your comment. In accordance with NEPA, the EA was made available to stakeholders and the public for a 30-day public comment period. Both, Volume I (Main Document) and Volume II (Appendices) of the EA were mailed to and received by all libraries listed in Appendix A. Mailed packages provided to the libraries included a letter explaining that the documents should be made available to the public. Additionally, all stakeholders identified in Appendix A received both volumes of the EA. In an error, Volume II (Appendices) of the EA was not posted on the Mountain Home AFB Environmental Website until after the public comment period had already begun. Once aware, the 366 FW extended the 30-day comment period on the EA by 6 days from October 14 to October 20, 2018. The public were notified of this extension via::</p> <ul style="list-style-type: none"> * September 25, 2018 email notification from Mountain Home AFB Urban CAS Project Point of Contact to all Boise scoping meeting stakeholders * October 2, 2018 posted notification on the Mountain Home AFB website: https://www.mountainhome.af.mil/News/Article-Display/Article/1651967/urban-close-air-support-comment-period-extended/

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					* October 2, 2018 press Release from Mountain Home AFB PAO * October 2, 2018 email from Mountain Home AFB PAO to local government offices
181	P. Smith	Public	<p>The idea of maintaining a standing army was repugnant to the Founders of this country and is an anathema to the principles of Liberty and freedom. Maintaining a standing army destroys Liberty by burdening the People with increased taxation and eventually compulsory service. Standing armies are always used by those who wield political power to accomplish a political agenda at the expense of the citizenry. Every nation in History that has created a standing army has destroyed not only the liberties and freedoms of their own people but nations abroad through unnecessary war mongering. Any excuse can be used to create a 'state of war' in which civil liberties are destroyed, such as the endless "war on Terrorism" in America. The so-called Patriot Act and NDAA are prime examples of how Liberty has been attacked in this country.</p> <p>The fact that the Air Force will "make a decision after considering input" reveals not only how much control it exerts over Americans, but also the arrogance and oppressive nature of our military industrial complex. If there is insufficient oversight and constraint exercised by The Congress, then it is up to the individual officers in the Armed Forces to stand against unlawful orders.</p> <ol style="list-style-type: none"> 1) To what end are these exercises directed at accomplishing? There are already sufficient training areas to practice bomb and strafing runs in the confinement of military reservations. It can only be assumed that the purpose for a 'realistic' training of the military in a city or town in America is for the purpose of performing military operations there in the near future. 2) Any war exercise that uses land or resources outside of designated military facilities is an affront to the peace we are entitled to attend as People of the united States of America. I demand the Air Force stand down and consider who ought to wield the Constitutional power in this country. 	S. Robertson	<p>Thank you for your comment.</p> <ol style="list-style-type: none"> 1) Section 1.3 of the EA presents the real-world challenges of conducting Urban CAS in combat. Section 1.5 of the EA describes the purpose of and need for the training and for the Proposed Action. 2) Section 2.2 lists the selection standards and rationale used to identify urban centers that would adequately support the proposed Urban CAS aircrew proficiency training.
182	R. Skinner	Public	Thank you for this opportunity to submit comments. I am opposed to	S. Robertson	Thank you for your comment.

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			<p>the U.S. Air Force's proposal to establish a roughly 175-mile Urban Close Air Support (CAS) Air and Ground Training Zone in southern Idaho. This proposal would present a serious challenge to our quality of life here in Boise and the surrounding area, something we have all worked hard to create.</p> <p>There are a wide variety of community based issues that would be raised if this proposal came to pass. I know that you are, or should be, aware of many of these, but to summarize:</p> <ol style="list-style-type: none"> 1) The proposal involves U.S. and Singaporean pilots in F-15E and F-15SG aircraft respectively coordinating with teams of up to 35 troops on the ground. <i>Approximately one-third of the proposed operations will be conducted by Singaporean military pilots flying the F-15SG Singaporean combat aircraft.</i> The ground troops will be in civilian clothing and unmarked vehicles. 2) Though the numbers are confusing, it appears there will be up to 400 day and night-time "training operations" involving a maximum of 1,600 round-trip "sorties" by up to four aircraft over the course of 160 days each year <i>for an unlimited number of years.</i> 		<ol style="list-style-type: none"> 1) Please see response to Comment 4. 2) Section 2.1.5 explains the annual operational requirements associated with the proposed Urban CAS aircrew proficiency training.
183	R. Skinner	Public	<p>Several concerned citizens have put together the following list of concerns which encompass some of the crucial questions and comments that area residents voiced at recent scoping meetings: 1) <i>Why are one-third of the training operations for the Singaporean Air Force?</i> Is this being done primarily for economic purposes? Who benefits financially from this arrangement? A separate publication describes how USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. One Singaporean news story quotes a local politician boasting about protecting his constituents in Singapore from harmful noise pollution from military aircraft. It seems they have shifted this problem to Idaho.</p> <p>2) Several other countries operate their own versions of the F-15.</p>	S. Robertson	<p>Thank you for your comment.</p> <ol style="list-style-type: none"> 1) Please see response to Comment 4. 2) Section 2.1.1 of the EA specifies the aircraft that would be used to conduct the proposed aircrew proficiency training. As stated in Section 2.1.1 of the EA clearly specifies that the aircraft involved in this Proposed Action would be the F-15E and F-15SG aircraft based at Mountain Home AFB.

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			What other foreign militaries can be expected to utilize Idaho's new large urban combat zone to avoid unwanted impacts in their own countries? USAF needs to be transparent. In fact, USAF's public outreach letter to stakeholders neglected to mention the Singaporean military planes and only mentioned the US F-15E aircraft.		
184	R. Skinner	Public	USAF's Urban Close Air Support (CAS) proposal is for an <i>open-ended, i.e., permanent urban combat zone in Boise and other Idahoan cities, without any mechanism for review</i> to assess how operations in the urban combat zone will affect our rapidly growing area over time. That is, there is no sunset date or specified date to review potentially negative impacts in light of other developments – including other USAF developments – in the state.	S. Robertson	Thank you for your comment. The proposed Urban CAS aircrew proficiency training is for the F-15E and F-15SG based at .Mountain Home AFB. Mountain Home AFB will continue to comply with the AF EIAP (32 C.F.R. 989) until directed otherwise. Coordination with local, state, and federal officials is guided by DODI 1322.28 (please see response to Comment 5).
185	R. Skinner	Public	<i>How can the public monitor USAF's compliance with the promised mitigation measures</i> , such as limiting the number of flights, the flying altitudes, the extent of ground operations, etc.? In fact, USAF disclosed at the scoping meetings that USAF had <i>already</i> been conducting urban combat training in Boise – apparently for years – in violation of environmental requirements.	S. Robertson	Thank you for your comment. Please see response to Comment 16 .
186	R. Skinner	Public	1. <i>USAF has not adequately analyzed the health, safety, and environmental risks</i> to humans or wildlife in its draft, and <i>has not adequately consulted with public officials</i> about these risks. Regarding noise, the U.S. Environmental Protection Agency states that, "Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity." The World Health Organization states that "children living in areas with high aircraft noise have delayed reading ages, poor attention levels, and high stress levels." USAF's analysis does not appear to include the cumulative impacts of the noise from the aircraft combined with the existing background noise. USAF calculations also appear to seriously undercount the proposed number of sorties by at least a third and the number of	S. Robertson	Thank you for your comment. Please see response to Comment 19 .

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			expected aircraft to be flying sorties. The USAF noise calculations need to be seriously analyzed by independent experts.		
187	R. Skinner	Public	<p>1. <i>Inadequate consultation with public officials, such as state and local law enforcement</i>, USAF neglected to notify many of the cities and towns that will be affected, and also many of the state legislative districts.</p> <p>The AF neglected to include the Idaho Department of Environmental Quality on its list of relevant state agencies. Many of the affected cities were not included on the list of stakeholders and the list of state legislators included only two in Idaho and one in Oregon, ignoring numerous legislative districts that are included in the proposed urban combat training zone.</p> <p>In summary, the list of stakeholders was arbitrary, and there was inadequate consultation with state, local, and federal agencies.</p>	S. Robertson	Thank you for your comment. Please see response to Comments 6 and 20 .
188	R. Skinner	Public	<p>1. USAF <i>does not appear to be seriously calculating the cumulative impacts</i> of the proposed permanent urban combat zone and other USAF operations in Idaho, such as the proposed F-35. It appears they may be unlawfully segmenting USAF proposals so as to be able to claim that each of them has negligible impacts. USAF's separate analysis of the impacts of the F-35's has not yet been released.</p>	S. Robertson	Thank you for your comment. The cumulative impacts analysis approach and descriptions of projects (based upon best-available information) that were considered in the cumulative effects analysis are provided in Section 4 of the EA.
189	R. Skinner	Public	<p>1. <i>How does this proposed permanent urban combat zone – the only one in the U.S. – fit with Boise's goal of being the "Most Livable City in the Country"?</i> Boise and surrounding towns within a 17-mile radius will be adversely impacted by increased noise and air pollution, with military aircraft circling overhead in a "wheel" and teams of "friendly" and "hostile" forces simulating warfare in civilian clothing and unmarked vehicles. The EA does not properly consider all socio-economic impacts. <i>USAF does not address the psychological impacts on veterans, refugees, and other war survivors of simulated urban warfare</i> and the activities mentioned above. <i>The USAF does not address the psychological impacts on current</i></p>	S. Robertson	Thank you for your comment. Please see the response to Comment 19 .

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			<i>servicemembers of waging simulated urban warfare in “the homeland.”</i>		
190	R. Skinner	Public	<i>The USAF has not done an analysis on air or noise quality impact on humans and on wildlife including migratory birds, and domestic animals.</i>	S. Robertson	Thank you for your comment. Please see response to Comment 19 . Noise and a quality analysis is presented in Sections 3.1 and 3.2 of the EA, respectively.
191	R. Skinner	Public	<i>Why isn’t USAF doing a comprehensive Environmental Impact Statement?</i> This EA includes only minimal analysis of the impacts. USAF regulations state that a full environmental impact statement should normally be conducted for expansion of supersonic training ground lower than 18,000 feet (this plan proposes 10,000 feet), yet the USAF has determined an EIS is not necessary. I hope that the Air Force will take these considerations into account and decide not to move forward with its proposal.	S. Robertson	Thank you for your comment. Please see response to Comment 19 . The proposed Urban CAS training is fully described in Sections 2.1 through 2.1.6 of the EA. The proposed training and would not involve supersonic flight.
192	R. Hansson	Public	I am writing to express my concern about the proposed use of Boise or any other US city as a combat training zone. It seems that with today’s virtual reality technology it shouldn’t be necessary to use a live city to meet the training objectives. If it is imperative to use a live city, those imperatives should be explicitly justified. Unfortunately, arguments related to defense spending are hard to combat because there are always steps we could take to do more to protect ourselves. I think that is one reason our defense budget is so massive and dwarfs other national defense budgets. Most of the other top spenders are our allies. A part of the proposal that I find particularly distasteful is that a significant portion of the training is for Singapore. I don’t feel like we should be dummy targets for the US military and feel even more strongly that we shouldn’t be dummy targets for the Singapore military.	S. Robertson	Thank you for your comment. Section 1.3 of the EA describes the real-world challenges of conducting Urban CAS during combat. Section 1.5 of the EA provides the purpose of and need for the proposed training. Please see response to Comment 4 .
193	C. Skinner	Public	I am writing today to voice my opposition to using Boise and Southern Idaho as an urban combat training ground. The Urban Close Air Support (CAS) Air and Ground Training Spaces in Urban Centers in Idaho-the large-scale permanent urban combat training zone extending roughly 175 miles across southern Idaho;	S. Robertson	Thank you for your comment. Please see response to Comment 4 .

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			involving U.S. and Singaporean pilots in F-15E and F-15SG aircraft respectively coordinating with teams of up to 35 troops on the ground. Approximately one-third of the proposed operations will be conducted by Singaporean military pilots flying the F-15SG Singaporean combat aircraft. The ground troops will be in civilian clothing and unmarked vehicles. I hope you will not move forward with this plan.		
194	A. McClanahan	Public	This communication addresses my concerns of the proposed US Air Force's Urban Combat Training Zone and my opposition to its implementation in Boise and other southern areas of Idaho. These areas are not appropriate for this proposed training. Additionally, Idaho cities should not be used as combat training grounds for hire by foreign military forces. My understanding is this proposal includes a permanent training zone and includes US and Singaporean pilots in F-15E and F-15SG aircraft and teams of up to 35 ground troops. Please keep me informed of any development of this proposal.	S. Robertson	Thank you for your comment. Section 2.2 describes the selection standards that were used to identify urban centers that would adequately support the proposed training. Section 2.3, Table 2-3 provides a comparison of urban center alternatives to the selection standards. Please see response to Comment 4 .
195	S. Troje	Public	The Air Force has not done sufficient analysis on the air or noise quality impact on humans and on wildlife including migratory birds, and domestic animals. For example, the draft rather dismissively asserts, "Ground operations would result in negligible impacts on the noise environment. Vehicles would generate automobile noise during ground operations which would naturally blend with other existing noise sources in the urban centers. These impacts would be negligible." The draft fails to consider that there are virtually no commercial flights out of the Boise Airport at night, and vehicle traffic is significantly less at certain times.	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
196	S. Troje	Public	The draft cites an Executive Order, Planning for Sustainability in the Next Decade, which requires the Department to evaluate climate change risks and vulnerabilities, and to measure, report and reduce greenhouse gas emissions by a specific percentage. Yet the draft goes on to state, "This analysis does not attempt to measure the actual incremental impacts of GHG emissions from the Proposed Action, primarily because there is a general lack of consensus on how to measure such impacts." This is unacceptable. No consideration is	S. Robertson	Thank you for your comment. Section 3.2.3.1 of the EA provides the air quality analysis conducted for the proposed action, including considerations on climate change. Because the numbers of proposed Urban CAS training events already occur on the installation, and would be redistributed to the urban centers identified as adequate to

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			<p>given to the growing population and development in Boise and the attendant environmental impacts this will have on the quality of our air, noise and life in general.</p> <p>It was regrettable to hear of the recent death of an American pilot aboard a fighter jet during a training exercise in the Ukraine. This could happen in Boise and has not been considered in the analysis. I really hope that the Air Force will find a common sense alternative to using Boise and surrounding areas for its war game training.</p>		support the training, impacts on air quality in the region would remain unchanged.
197	A. Brueck	Public	The U.S. Air Force is offering Idahoans time to comment on up to 160 proposed war game flights over nine cities, including Boise. I have been a Boise resident for almost 39 years. People here value quality of life particularly a “peaceful” environment where eagles, hawks, deer etc are at home in our fair city. I AM OPPOSED TO CHOOSING BOISE FOR THE 160 PROPOSED WAR GAME FLIGHTS.	S. Robertson	Thank you for your comment.
198	T. Andreae	Public	I am fully against this war games proposal. Our city is home to many refugee families who have had to flee war torn countries. Fighter jets overhead doing mock war time maneuvers would likely trigger post traumatic reactions for numerous individuals.	S. Robertson	Thank you for your comment.
199	A. Schwind	Pubic	Your urban “war games” are not welcome in our neighborhood. Stay out of Boise and fly your death planes elsewhere.	S. Robertson	Thank you for your comment.
200	B. McVay	Public	I support this! Anything that helps our military I am in favor of.	S. Robertson	Thank you for your comment.
201	W. Fowkes A. Whitford E. Fowkes	Public	<p>We are opposed to the conduct of war games over and around Boise, Id.</p> <p>All wars result in suffering.</p> <p>Stop building war machines and focusing on war. What we focus on we create, through creative thought, more of the same. Focus on the Metta (below) which is the commitment to thriving for all beings.</p> <p>Continuing the same preparations for war, guarantee war with ever escalating weapons and devastation. Evolutionary consciousness shift toward thriving will occur when all decisions are made from the Metta (below) (“May all beings have fresh clean air, good water & nourishing food. May all beings have shelter, sanctuary & a safe home. May all beings have others they share respect & love with.</p>	S. Robertson	Thank you for your comment.

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			May all beings, rooted in loving kindness, know & be able to express their true purpose. May all beings be well, balanced, happy & free from suffering. That all may thrive, today we do what we can to make this so."). No life ending war game preparation in public air & sound space in Idaho. THIS IS NOT A GAME.		
202	S. Freeman Genz	Public	<p>There are many things that concern me about the proposed Urban Warfare Training (CAS) EA that I read through recently. In addition to the fact that I am already very disturbed by the fighter jets that fly over my home nearly every day, sometimes multiple times, I believe the FONSI has not taken into account the true impacts of this proposed program. Though the numbers are confusing, it appears there will be up to 400 day and night-time "training operations" involving a maximum of 1,600 round-trip "sorties" by up to four aircraft over the course of 160 days each year for an unlimited number of years. I already deal with the noise of commercial air traffic, which I signed up for when I bought a house near Maple Grove and Overland in Boise. I did not however by a house in Mountain Home, because I do not wish to live near and Air Force base, for multiple reasons that I will share in my comments below.</p> <p>My neighbors have told me that their 3 year old daughter has, on several occasions, been woken up from naps by the sound of F-15's flying over their house. All conversation must come to a halt, and the windows rattle in my own home when they fly over. I know you said that these trainings will take place at 10,000 ft. or above, but you are not accounting for take-offs and landings. They interrupt my daily life and are not welcomed. And I'm sure property values will be negatively impacted. Have you looked into declining property values in areas with increased Air Force activity?</p>	S. Robertson	Thank you for your comment. Please see response to Comment 19 . All take off and landings and would occur at Mountain Home AFB.
203	S. Freeman Genz	Public	<p>USAF does not appear to be seriously calculating the cumulative impacts of the proposed permanent urban combat zone and other USAF operations in Idaho. It appears they may be unlawfully segmenting USAF proposals so as to be able to claim that each of them has negligible impacts.</p> <p>Approximately one-third of the proposed operations will be conducted</p>	S. Robertson	Thank you for your comment. The analysis approach to determine cumulative impacts is provided in Section 4 . Please see response to Comment 4 .

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			<p>by Singaporean military pilots flying the F-15SG Singaporean combat aircraft. Why should we be subject to foreign military using the air space over our city? Who benefits financially from this arrangement? A separate publication describes how USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. In 2007 the number of F-15SG's at the start of the Republic of Singapore Air Force F-15SG Beddown at Mountain Home AFB was 10, and that was to increase the number of annual sorties by 25 percent, increase noise pollution by 15 percent, and airspace emissions for Jarbidge and Owyhee MOAs were projected to increase an average of 22 percent for CO, 27 percent for NOx, and 26 percent for SO2. Now we are looking at potentially doubling that, and over urban airspace.</p> <p>I read a Singaporean news story quoting a local politician boasting about protecting his constituents in Singapore from harmful noise pollution from military aircraft. It seems they have shifted this problem to Idaho without consent from Idahoans. I've also read countless stories of upset Singaporeans complaining fervently about the noise pollution caused by Air Force trainings.</p> <p>What other foreign militaries can be expected to utilize Idaho's new large urban combat zone to avoid unwanted impacts in their own countries? USAF needs to be transparent. In fact, USAF's public outreach letter to stakeholders neglected to mention the Singaporean military planes and only mentioned the US F-15E aircraft.</p>		
204	S. Freeman-Genz	Public	There is no sunset date or specified date to review potentially negative impacts, and this concerns me. If this is indefinite, I may have to move.	S. Robertson	Thank you for your comment.
205	S. Freeman-Genz	Public	USAF has not adequately analyzed the health, safety, and environmental risks to humans or wildlife in its draft, and has not adequately consulted with public officials about these risks. Regarding noise, the U.S. Environmental Protection Agency states that, "Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity." The World Health Organization states, "children living in areas with high aircraft noise have delayed reading	S. Robertson	Thank you for your comment. Please see response to Comments 6, 19, and 20 .

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			<p>ages, poor attention levels, and high stress levels.” USAF’s analysis does not appear to include the cumulative impacts of the noise from the aircraft combined with the existing background noise. USAF calculations also appear to seriously undercount the proposed number of sorties by at least a third and the number of expected aircraft to be flying sorties. The USAF noise calculations need to be seriously analyzed by independent experts.</p> <p>For me, pollution is another serious issue, as we are already dealing with compromised air quality in the Treasure Valley due to our growing population, seasonal fires, and the inversion.</p> <p>I read the following: USEPA Region 10 and the Idaho Department of Environmental Quality regulate air quality in Idaho. [And the Idaho DEQ was not even consulted in this EA!!] The Clean Air, as amended, assigns USEPA responsibility to establish the primary and secondary National Ambient Air Quality Standards that specify acceptable concentration levels of six criteria pollutants: particulate matter (measured as both particulate matter less than 10 microns in diameter [PM₁₀] and particulate matter less than 2.5 microns in diameter [PM_{2.5}]), sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), and lead. Short-term NAAQS (1-, 8-, and 24-hour periods) have been established for pollutants contributing to acute health effects, while long-term NAAQS (annual averages) have been established for pollutants contributing to chronic health effects. The closest monitoring station is in Boise, a highly urbanized area, and concentrations of pollutants are likely lower in the rural areas. Although annual 8-hour concentrations of O₃ and PM_{2.5} are greater than the primary air quality standards, they must be exceeded over a 3-year period to violate the NAAQS; hence, the attainment status. This is a huge concern. When I read about O₃ (ozone) I found that it can cause damage to the mucous and respiratory tissues of animals (humans) and also damage the tissues of plants. The Particulate Matter smaller than 2.5 microns can penetrate into the gas exchange region of the lungs. This can worsen chronic diseases such as asthma, bronchitis and cardiovascular disease. Increases in PM can cause haze and reduce visibility. These things need to be seriously investigated before you launch into</p>		

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			a program that will be affecting my health and the health of those I love in adverse ways!		
206	S. Freeman-Genz	Public	Air and ground crews will communicate with tactical communication radios (e.g., frequency modulation, very high frequency, ultra-high frequency, and satellite communication), and navigational GPS. We are already being exposed to many different frequencies that are now being shown to have adverse affects on our health. These high and ultra-high frequencies should be investigated further in an EIS.	S. Robertson	Thank you for your comment. Please see response to Comment 14 .
207	S. Freeman-Genz	Public	The USAF has not made an effort to share their plans with the people who will be most affected. As previously Department of Environmental Quality on its list of relevant state agencies. Many of the affected cities were not included on the list of stakeholders and the list of state legislators included only two in Idaho and one in Oregon, ignoring numerous legislative districts that are included in the proposed urban combat training zone. In summary, the list of stakeholders was arbitrary, and there was inadequate consultation with state, local, and federal agencies.	S. Robertson	Thank you for your comment. Please see response to Comments 6 and 20 .
208	S. Freeman-Genz	Public	The EA does not properly consider the psychological impacts, and related socio-economic impacts. It's our mental health as individuals that create a healthy, or unhealthy society. USAF does not address the psychological impacts on veterans, refugees, and other war survivors of simulated urban warfare and the activities mentioned above. I have included a recent statement made by a veteran in Boise after posting his opposition to the (CAS) proposal on a social media website. It is an important read. Believe me, not all veterans are flag waving patriots who yell "Freedom!" every time a jet flies over. Many have a deeply visceral response that is very troubling. Another veteran commented on this statement and I have also included this for reference, illustrating that veterans continue to suffer, and about 20 commit suicide every day.(1) I don't think a constant reminder of war would do our servicemen and women in this community any good. (1) "VA: Suicide rate for younger veterans increased by more than 10 percent," Leo Shane III, Sept. 26, 2018 https://www.militarytimes.com/news/pentagon-congress/2018/09/26/suicide-rate-spikes-among-younger-veterans/ . I	S. Robertson	Thank you for your comment. Please see responses to Comments 8 and 19 . Under the Proposed Action, Urban CAS flight activities may be conducted at any one of the urban centers identified as adequate to support the aircrew proficiency training. Thus, flight operations would not be concentrated over any one urban center. Additionally, the 366 Fighter Wing Range Operations would monitor training for compliance with the EA. The Mountain Home AFB Public Affairs Office (208-828-6800).

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			myself have spent a large portion of my life investigating and researching the Iraq war, educating others about the horrors of war, and have served as a citizens lobbyist in support of the creation of a cabinet level Department of Peace (HR808). My step-dad suffered greatly from PTSD as a result of his time served in the Vietnam War. The only time I ever saw this man cry was when he confessed to me that he had 'killed people.' "Our government trained me to kill, then put me in a situation where I had to kill or be killed." I don't think he has ever forgiven himself.		
209	S. Freeman-Genz	Public	The USAF has not done an analysis on air or noise quality impact on humans and on wildlife including migratory birds, and domestic animals. I know that many animals rely on an acute sense of hearing in order to track and find prey. Have studies been done on how noise affects animals with more sensitive hearing, and if there are any impacts on their ability to hunt when exposed to the sound pollution from jets for us to 6 hours a day? How is this affecting birds and their communication, migratory patterns, nesting, mating, etc. These studies need to be done. A full EIS is absolutely necessary.	S. Robertson	Thank you for your comment. Please see responses to Comments 8 and 19 .
210	S. Freeman-Genz	Public	<p>PTSD sufferers experience heightened physiological arousal in response to sounds, images, and thoughts related to specific traumatic incidents. A large number of studies have confirmed that people with PTSD, but not controls who did not develop PTSD, respond to such reminders with significant increases in heart rate, skin conductance, and blood pressure.¹² The highly elevated autonomic responses to reminders of traumatic experiences that happened years, and sometimes decades, ago illustrate the intensity and timelessness with which these memories continue to affect current experience. ³</p> <ol style="list-style-type: none"> 1. Dobbs D., Wilson WP. Observations on the persistence of traumatic warneurosis. <i>J Nerv Ment Dis.</i> 1960;21:40–46. 2. Dissociation, somatization, and affect dysregulation: the complexity of adaptation of trauma. van der Kolk BA, Pelcovitz D, Roth S, Mandel FS, McFarlane A, Herman JL <i>Am J Psychiatry.</i> 1996 Jul; 153(7 Suppl):83-93. 3. Once bitten, twice shy: beyond the conditioning model of PTSD. 	S. Robertson	<p>Thank you for your comment. Please see responses to Comments 8 and 19.</p> <p>Under the Proposed Action, Urban CAS flight activities may be conducted at any one of the urban centers identified as adequate to support the aircrew proficiency training. Thus, flight operations would not be concentrated over any one urban center. Additionally, the 366 Fighter Wing Range Operations would monitor training for compliance with the EA. The information can be obtained by contacting the Mountain Home AFB Public Affairs Office (208-828-6800).</p>

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			<p>Pitman RK, Orr SP, Shalev AY Biol Psychiatry. 1993 Feb 1; 33(3):145-6.</p> <p>Personally, the sound of jets elicits a visceral response in my body associated with my complete disdain for war itself. I do not believe in killing people, and I am especially against dropping bombs on cities. My heart rate elevates and the stress associated with my 15 years of independent investigation & research, and the associated images and horrors come to the forefront, in addition to the anger and frustration about the growing prevalence of violence as an acceptable response. This takes me away from my present moment and the task at hand and disrupts my thoughts and feelings. Sounds are directly correlated to emotional responses in the body. For example, the basis behind music therapy is that soothing and pleasant sounds can benefit an individual; both physically and mentally, through improved heart rate, reduced anxiety, stimulation of the brain, and improved learning. Unpleasant sounds can have the opposite effect, especially sounds associated with trauma.</p>		
211	S. Freeman-Genz	Public	<p>Why isn't USAF doing a comprehensive Environmental Impact Statement? This EA includes only minimal analysis of the impacts. USAF regulations state that a full environmental impact statement should normally be conducted for expansion of supersonic training ground lower than 18,000 feet (this plan proposes 10,000 feet), yet the USAF has determined an EIS is not necessary.</p>	S. Robertson	<p>Thank you for your comment. Please see responses to Comments 4, 8, 13, and 19. Additionally, the proposed Urban CAS aircrew proficiency training would not involve supersonic flight, Flight operations would be conducted as described in Section 2.1.5 of the EA.</p> <p>The full list of stakeholders with whom Mountain Home AFB consulted or coordinated for the EA is provided in Appendix A.</p>
212			<p>There are many things that concern me about the proposed Urban Warfare Training (CAS) EA that I read through recently. In addition to the fact that I am already very disturbed by the fighter jets that fly over my home nearly every day, sometimes multiple times, I believe the FONSI has not taken into account the true impacts of this proposed program.</p> <p>Though the numbers are confusing, it appears there will be up to 400</p>	S. Robertson	<p>Thank you for your comment. Please see responses to Comments 4, 6, 8, 19, and 20.</p>

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			<p>day and <i>night-time</i> “training operations” involving a maximum of 1,600 round-trip “sorties” by up to four aircraft over the course of 160 days each year <i>for an unlimited number of years</i>. I already deal with the noise of commercial air traffic, which I signed up for when I bought a house near Maple Grove and Overland in Boise. I did not however by a house in Mountain Home, because I do not wish to live near and Air Force base, for multiple reasons that I will share in my comments below.</p> <p>My neighbors have told me that their 3 year old daughter has, on several occasions, been woken up from naps by the sound of F-15’s flying over their house. All conversation must come to a halt, and the windows rattle in my own home when they fly over. I know you said that these trainings will take place at 10,000 ft. or above, but you are not accounting for take-offs and landings. They interrupt my daily life and are not welcomed. And I’m sure property values will be negatively impacted. Have you looked into declining property values in areas with increased Air Force activity?</p> <p>USAF <i>does not appear to be seriously calculating the cumulative impacts</i> of the proposed permanent urban combat zone and other USAF operations in Idaho. It appears they may be unlawfully segmenting USAF proposals so as to be able to claim that each of them has negligible impacts.</p> <p>Approximately one-third of the proposed operations will be conducted by Singaporean military pilots flying the F-15SG Singaporean combat aircraft. Why should we be subject to foreign military using the air space over our city? Who benefits financially from this arrangement? A separate publication describes how USAF, at the request of Singapore’s Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. In 2007 the number of F-15SG’s at the start of the Republic of Singapore Air Force F-15SG Beddown at Mountain Home AFB was 10, and that was to increase the number of annual sorties by 25 percent, increase noise pollution by 15 percent, and airspace emissions for Jarbidge and Owyhee MOAs were projected to increase an average of 22 percent for CO, 27 percent for NOx, and 26 percent for SO2. Now we are looking at potentially</p>		

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			<p>doubling that, and over urban airspace.</p> <p>I read a Singaporean news story quoting a local politician boasting about protecting his constituents in Singapore from harmful noise pollution from military aircraft. It seems they have shifted this problem to Idaho without consent from Idahoans. I've also read countless stories of upset Singaporeans complaining fervently about the noise pollution caused by Air Force trainings.</p> <p>What other foreign militaries can be expected to utilize Idaho's new large urban combat zone to avoid unwanted impacts in their own countries? USAF needs to be transparent. In fact, USAF's public outreach letter to stakeholders neglected to mention the Singaporean military planes and only mentioned the US F-15E aircraft.</p> <p>USAF has not adequately analyzed the health, safety, and environmental risks to humans or wildlife in its draft, and has not adequately consulted with public officials about these risks. Regarding noise, the U.S. Environmental Protection Agency states that, "Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity." The World Health Organization states, "children living in areas with high aircraft noise have delayed reading ages, poor attention levels, and high stress levels." USAF's analysis does not appear to include the cumulative impacts of the noise from the aircraft combined with the existing background noise. USAF calculations also appear to seriously undercount the proposed number of sorties by at least a third and the number of expected aircraft to be flying sorties. The USAF noise calculations need to be seriously analyzed by independent experts.</p> <p>For me, pollution is another serious issue, as we are already dealing with compromised air quality in the Treasure Valley due to our growing population, seasonal fires, and the inversion. I read the following:</p> <p>USEPA Region 10 and the Idaho Department of Environmental Quality regulate air quality in Idaho. [And the Idaho DEQ was not even consulted in this EA!!] The Clean Air, as amended, assigns USEPA responsibility to establish the primary and secondary National</p>		

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			<p>Ambient Air Quality Standards that specify acceptable concentration levels of six criteria pollutants: particulate matter (measured as both particulate matter less than 10 microns in diameter [PM₁₀] and particulate matter less than 2.5 microns in diameter [PM_{2.5}]), sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), and lead. Short-term NAAQS (1-, 8-, and 24-hour periods) have been established for pollutants contributing to acute health effects, while long-term NAAQS (annual averages) have been established for pollutants contributing to chronic health effects. The closest monitoring station is in Boise, a highly urbanized area, and concentrations of pollutants are likely lower in the rural areas. Although annual 8-hour concentrations of O₃ and PM_{2.5} are greater than the primary air quality standards, they must be exceeded over a 3-year period to violate the NAAQS; hence, the attainment status.</p> <p>This is a huge concern. When I read about O₃ (ozone) I found that it can cause damage to the mucous and respiratory tissues of animals (humans) and also damage the tissues of plants. The Particulate Matter smaller than 2.5 microns can penetrate into the gas exchange region of the lungs. This can worsen chronic diseases such as asthma, bronchitis and cardiovascular disease. Increases in PM can cause haze and reduce visibility. These things need to be seriously investigated before you launch into a program that will be affecting my health and the health of those I love in adverse ways! EIS.</p>		
213	S. Freeman-Genz	Public	Air and ground crews will communicate with tactical communication radios (e.g., frequency modulation, very high frequency, ultra-high frequency, and satellite communication), and navigational GPS. We are already being exposed to many different frequencies that are now being shown to have adverse effects on our health. These high and ultra-high frequencies should be investigated further in an	S. Robertson	Thank you for your comment. Please see response to Comment 14 .
214	S. Freeman-Genz	Public	USAF does not address the psychological impacts on veterans, refugees, and other war survivors of simulated urban warfare and the activities mentioned above. I have included a recent statement made by a veteran in Boise after posting his opposition to the (CAS) proposal on a social media website. It is an important read. Believe me, not all veterans are flag waving patriots who yell "Freedom!"	S. Robertson	<p>Thank you for your comment. Please see responses to Comments 8 and 19.</p> <p>Under the Proposed Action, Urban CAS flight activities may be conducted at any</p>

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			<p>every time a jet flies over. Many have a deeply visceral response that is very troubling. Another veteran commented on this statement and I have also included this for reference, illustrating that veterans continue to suffer, and about 20 commit suicide every day.(1) I don't think a constant reminder of war would do our servicemen and women in this community any good.</p> <p>(1) "VA: Suicide rate for younger veterans increased by more than 10 percent," Leo Shane III, Sept. 26, 2018 https://www.militarytimes.com/news/pentagon-congress/2018/09/26/suicide-rate-spikes-among-younger-veterans/</p> <p>I myself have spent a large portion of my life investigating and researching the Iraq war, educating others about the horrors of war, and have served as a citizens lobbyist in support of the creation of a cabinet level Department of Peace (HR808). My step-dad suffered greatly from PTSD as a result of his time served in the Vietnam War. The only time I ever saw this man cry was when he confessed to me that he had 'killed people.' "Our government trained me to kill, then put me in a situation where I had to kill or be killed." I don't think he has ever forgiven himself.</p>		<p>one of the urban centers identified as adequate to support the aircrew proficiency training. Thus, flight operations would not be concentrated over any one urban center. Additionally, the 366 Fighter Wing Range Operations would monitor training for compliance with the EA. The Mountain Home AFB Public Affairs Office (208-828-6800).</p>
215	S. Freeman-Genz	Public	There is no sunset date or specified date to review potentially negative impacts, and this concerns me. If this is indefinite, I may have to move.	S. Robertson	Thank you for your comment.
216	S. Freeman-Genz	Public	The USAF has not made an effort to share their plans with the people who will be most affected. As previously mentioned, the AF neglected to consult with the Idaho Department of Environmental Quality on its list of relevant state agencies. Many of the affected cities were not included on the list of stakeholders and the list of state legislators included only two in Idaho and one in Oregon, ignoring numerous legislative districts that are included in the proposed urban combat training zone. In summary, the list of stakeholders was arbitrary, and there was inadequate consultation with state, local, and federal agencies. The EA does not properly consider the psychological impacts, and related socio-economic impacts. It's our mental health as individuals that create a healthy, or unhealthy society.	S. Robertson	Thank you for your comment, Please see response to Comments 6 and 20 .

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
217	S. Freeman-Genz	Public	<p>PTSD sufferers experience heightened physiological arousal in response to sounds, images, and thoughts related to specific traumatic incidents. A large number of studies have confirmed that people with PTSD, but not controls who did not develop PTSD, respond to such reminders with significant increases in heart rate, skin conductance, and blood pressure.^{1,2} The highly elevated autonomic responses to reminders of traumatic experiences that happened years, and sometimes decades, ago illustrate the intensity and timelessness with which these memories continue to affect current experience. ³</p> <ol style="list-style-type: none"> 1. Dobbs D., Wilson WP. Observations on the persistence of traumatic warneurosis. <i>J Nerv Ment Dis.</i> 1960;21:40–46. 2. Dissociation, somatization, and affect dysregulation: the complexity of adaptation of trauma. van der Kolk BA, Pelcovitz D, Roth S, Mandel FS, McFarlane A, Herman JL <i>Am J Psychiatry.</i> 1996 Jul; 153(7 Suppl):83-93. 3. Once bitten, twice shy: beyond the conditioning model of PTSD. Pitman RK, Orr SP, Shalev AY <i>Biol Psychiatry.</i> 1993 Feb 1; 33(3):145-6. <p>Personally, the sound of jets elicits a visceral response in my body associated with my complete disdain for war itself. I do not believe in killing people, and I am especially against dropping bombs on cities. My heart rate elevates and the stress associated with my 15 years of independent investigation & research, and the associated images and horrors come to the forefront, in addition to the anger and frustration about the growing prevalence of violence as an acceptable response. This takes me away from my present moment and the task at hand and disrupts my thoughts and feelings. Sounds are directly correlated to emotional responses in the body. For example, the basis behind music therapy is that soothing and pleasant sounds can benefit an individual; both physically and mentally, through improved heart rate, reduced anxiety, stimulation of the brain, and improved learning. Unpleasant sounds can have the opposite effect, especially sounds associated with trauma.</p>	S. Robertson	<p>Thank you for your comment. Please see responses to Comments 8 and 19.</p> <p>Under the Proposed Action, Urban CAS flight activities may be conducted at any one of the urban centers identified as adequate to support the aircrew proficiency training. Thus, flight operations would not be concentrated over any one urban center. Additionally, the 366 Fighter Wing Range Operations would monitor training for compliance with the EA. The Mountain Home AFB Public Affairs Office (208-828-6800).</p>

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
218	S. Freeman-Genz	Public	The USAF has not done an analysis on air or noise quality impact on humans and on wildlife including migratory birds, and domestic animals. I know that many animals rely on an acute sense of hearing in order to track and find prey. Have studies been done on how noise affects animals with more sensitive hearing, and if there are any impacts on their ability to hunt when exposed to the sound pollution from jets for us to 6 hours a day? How is this affecting birds and their communication, migratory patterns, nesting, mating, etc. These studies need to be done. A full EIS is absolutely necessary!	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
219	S. Freeman-Genz	Public	Why isn't USAF doing a comprehensive Environmental Impact Statement? This EA includes only minimal analysis of the impacts. USAF regulations state that a full environmental impact statement should normally be conducted for expansion of supersonic training ground lower than 18,000 feet (this plan proposes 10,000 feet), yet the USAF has determined an EIS is not necessary.	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
220	S. Freeman-Genz	Public	I'm also concerned about potential accidents and crashes. On Oct. 8 th , less than two weeks ago, a USAF pilot with over 20 years of experience crashed during a training in the Ukraine. With increased activity over urban centers, the chance of a crash increases, and potentially in a location where people on the ground would be killed or injured. https://www.foxnews.com/world/air-force-ids-american-pilot-killed-in-ukrainian-fighter-jet-crash?fbclid=IwAR3TVMAH7hgNV3yzz1It1SDFFY8IHW9XS4Gxel0jA4t8yCQ-x_8SxXkHojU Overall, the risks are too great to our health, safety, well-being, wildlife, economy and ultimately our quality of life. I LOVE BOISE! We do not want the USAF flying their jets here. This is my home. Don't ruin it!	S. Robertson	Thank you for your comment. Please also see responses to Comments 13, 14, and 42 . Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).
221	E. Yuen	Public	This is a a crazy and disruptive thing to do to Boise and the surrounding areas. Please locate your Air Force practice over non inhabited areas. The sound alone is too much. This is not the city I want to live in. The stress and anxiety it will cause residents is not	S. Robertson	Thank you for your comment. Please see response to Comment 8 . Noise analysis is provided in Section 3.1 of the EA.

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
			okay. Please reconsider!		
222	G. Giuntini	Public	As a resident of Boise, I am totally opposed to having "war games" in Boise. Claiming that there will be no effects as per your "Environmental Assessment" is simply ludicrous, and any economist would tell you that there are ALWAYS costs, even if only implicit costs. Even my time writing this email opposing it is a cost. I hope that you will consider doing better studies in the future, using outside parties without direct interests.	S. Robertson	Thank you for your comment.
223	J. Siegel	Public	I am a resident and small business owner in the city of Boise. I reside in Ada County. I strongly am against F15 fighter jets doing flight operations from Mountain Home Air Force Base over the city of Boise. These fighter jets cost up to \$80 million each, representing more than \$4.5 billion in a city where the average worker makes just 0.000005% of that total: \$21,991 per year. Idaho has one of the highest rates of extreme poverty in the country. In the last 8 years homelessness among children has increased by 64%. More than 20% of the population lack access to health care. As military spending skyrockets, so does poverty throughout the country. The U.S. spends trillions of dollars on war overseas at the same time it slashes funding for housing, education and environmental protections. We need money for jobs and education, not for war and occupation! No urban war training!	S. Robertson	Thank you for your comment. Please see response to Comment 19 .
224	M. Callahan	Public	My child has high anxiety and these types of planes and fly-overs create havoc with his ability to manage his behavior at school and at home. NO to War Games. Construct tall structures out in the dessert closer to Mtn Home.	S. Robertson	Thank you for your comment. Please see responses to Comments 8 and 19 . Under the Proposed Action, Urban CAS flight activities may be conducted at any one of the urban centers identified as adequate to support the aircrew proficiency training. Thus, flight operations would not be concentrated over any one urban center. Additionally, the 366 Fighter Wing Range Operations would monitor training for compliance with the EA. The information can be obtained by contacting the Mountain

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

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	Name	Agency			
					Home AFB Public Affairs Office (208-828-6800).
225	J. Duerner	Public	You have so many other places to train. I already moved my family away from the airport to avoid the air pollution and noise. NO!	S. Robertson	Thank you for your comment. Section 1.3 of the EA describes the real-world challenges of conducting Urban CAS operations during combat. Section 1.5 of the EA provides the purpose of and need for the proposed training. Section 2.2 of the EA provides the selection standards used to identify urban centers located near the installation that would adequately support the proposed Urban CAS aircrew proficiency training.
226	S. Benson	Public	I STRONGLY oppose the urban close air combat drills. I live in Boise Idaho. The noise pollution and war machines flying overhead are NOT appreciated. A FIRM NO TO THIS!	S. Robertson	Thank you for your comment. Noise analysis is provided in Section 3.1 of the EA.
227	K. Youtz	Public	There are many people with untreated psychosis living in our city and area. People with schizophrenia and similar illnesses cannot tell the difference between reality and non-reality. These “games” will be terrifying to them and their illnesses may worsen. I do not think this type of cruel torment of people with severe untreated mental illness is something to initiate. Their lives are difficult and painful enough as it is.	S. Robertson	Thank you for your comment. Please see responses to Comments 8 and 19 . Under the Proposed Action, Urban CAS flight activities may be conducted at any one of the urban centers identified as adequate to support the aircrew proficiency training. Thus, flight operations would not be concentrated over any one urban center. Additionally, the 366 Fighter Wing Range Operations would monitor training for compliance with the EA. The Mountain Home AFB Public Affairs Office (208-828-6800).
228	K. Ickes	Public	I would like to express my concern and opposition to the proposal for Air Force training activities around Boise. Our community is growing at an incredibly fast rate, and traffic, noise, and air pollution are all changing our quality of life. Air Force jets flying through or near our city will create additional noise and visible distraction. In addition, the presence of planes training for war in our community is very	S. Robertson	Thank you for your comment. Please see response to Comment 19 .

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
			disturbing and should not be forced upon Boise citizens. The analysis in the Environmental Assessment falls short of addressing the potential concerns of Boise's citizens, including noise and air pollution and safety and quality of life. A FONSI is inappropriate in this case. A full EIS would allow more opportunity for comment and public participation in determining whether the proposed action is a good fit for our community.		
229	S. Church-Cowart	Public	<p>I am deeply opposed to this proposal. Below, I have listed several reasons why I think this way.</p> <p>1) The military claims that training for jet pilots is vital to their effectiveness in combat. However, this training poses potential harm to people, animals and property.</p> <p>2) "Training" is a word used to describe a situation when a person or group of people is allowed to make mistakes and learn from those mistakes in a controlled and facilitated environment. Since there has been numerous evidence of jet pilot error in other similar conditions it is irresponsible to assume accidents won't happen in a populated urban area. The attitude behind this proposal tells the members of this community that our lives are irrelevant in comparison to their "necessary training".</p> <p>3) There are studies showing the wildlife in this area are and will be effected by the loud noises and lasers.</p> <p>4) The people of the treasure valley have already been talking about the noise of the jet planes. Animals are getting scared, which raises concern for the community which in turn raises concern about this proposal and the potential long term effects of the proposal.</p> <p>Thank you and I hope the concerns of the people of this community outweigh the irresponsible "need" of the military.</p>	S. Robertson	Thank you for your comment. Please see responses to Comments 13 and 19 .
230	I. Patrick	Public	<p>I am really concerned to hear that the draft Environmental Assessment by the US MH AFB concluded that their proposed year around military training in and over Boise will have No Significant Impact on civilians living in this still peaceful city. I can understand that for the military people it may seem so. But I do not want my family to be involved in this type of constant military activity. Because it sends my children a message that it is Normal to be in the state of</p>	S. Robertson	Thank you for your comment.

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Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

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	Name	Agency			
			<p>constant war.</p> <p>On average, America has been at war about 93% of its history. President Donald Trump largely grew his predecessor's conflicts in Afghanistan, Iraq, Syria, Yemen, Somalia, Libya, and Niger - which by the way are nowhere near the U.S. I think your URBAN CAS proposal is bringing these endless foreign wars back to U.S. soil in the form of a permanent training area over 9 major cities in Idaho.</p> <p>Next, the USAF Secretary will be asking the Congress for more funding, so you can fly endless CAS circles over our cities.</p> <p>Besides shattering peace and destroying countries, the U.S. Department of Defense is known as the largest polluter in the world . When acting overseas the DoD obviously is not subject to NEPA. At home, DoD rigs NEPA processes by piecemealing the impacts, or declaring a FONSI "No Significant Impact" earlier at EA stage . And now Trump administration wants to gut NEPA. You can go ahead and claim that the environment itself is not significant, just as you claim that you training using civilians and cities as targets is not a big deal at all, because the military will not wear uniforms and will not be armed, so the civilians will not even notice the military activity.</p> <p>I have to ask you what impact on civilians would the USAF consider to be significant, if not Environmental Impacts of military jet engine noise and fuel pollution? Would it have to be something as disruptive as carpet bombing the city? Because in this EA you are claiming that practicing targeted air strikes on our city by JTAC teams and F-15E planes year around including some at night time has no significant impact on a civilian city. If it has no significant impacts on residents then it should be done at the best location for such activity, a real urban environment of Washington D.C.</p> <p>I am still awaiting your answer as to the names and rank of the people who originated the Urban CAS proposal for 9 Idaho cities, so far the document released to the public does not mention its authors. If this is such a great idea, they should be proud to sign their names on Urban CAS proposal.</p> <p>I appreciate you withdrawing your flawed proposal to use my city as a permanent military training range for the MH AFB.</p>		

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
231	K. McDonald	Public	I'm against this. When fighter jets pass over my neighborhood unexpectedly it's loud, upsetting and scary. I understand scheduling a few days/year such as July 4th, but this would be more frequent.	S. Robertson	Thank you for your comment.
232	A.	Public	Couldn't they happen over open land / low population areas?	S. Robertson	
233	J. Benner	Public	I do NOT want my home used as a WAR training ground!	S. Robertson	Thank you for your comment
234	C. Williams	Public	I am a Veteran and a Patriot. I support the proposed war game flights in the Boise, Idaho area. It would be a privilege to have fighter pilots practice their skills in our skies.	S. Robertson	Thank you for your comment
235	E_T. Mayes	Public	<p>We live in the northwest side of the Boise airport flight path, at the Five Mile and Overland area. We were aware at the time of purchase seven years ago our home was in the path of commercial flights as well as the path for the Air Guard's "Warthog" flights. The noise level we experience while trying to have a relaxing weekend in our backyard has completely changed with F 15s. Why is it necessary to invade our peace and quiet with these trainings on the two days we have at home? Please don't try to say that the military will be conducting these flights as low as 10,000 feet, and that it is important to train around tall buildings in a major city. First, the F 15s flying over us are well below 10,000 feet regularly. Second, Boise's only tall buildings sit in a bowl, and by large city standards, these buildings aren't tall. There are no tall buildings here. The F 15s aren't flying near these buildings anyway.</p> <p>It has only been since regular weekend flights by F15s started that decibel levels became a concern to us. 100 dbs is a common noise level when these planes fly over. We record this. 100 decibels is not only unsettling, it borders on damaging to the human ear. What a nice way to spend the weekend in the backyard entertaining friends and family.</p> <p>We are more patriotic than most, but in this case, these jets aren't the sound of freedom, they are the painful, disruptive sound of what; the City and mayor trying to compensate for the loss of the F 35?</p>	S. Robertson	Thank you for your comment. Please see responses to Comments 8 and 19 .

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Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
	Name	Agency			
236	W. Wilson	Snake River Alliance	<p>The Snake River Alliance is a nonprofit organization whose mission is to protect Idahoans from nuclear threats and advocate for safe, clean and renewable energy. We respectfully request that the Air Force select the No Action alternative regarding the 366 FW Close Force Training Operations. The EA is inadequate and does not fully outline alternatives to the proposed action.</p> <p>Our primary office is located in the Boise area of operations and many of our members live in the surrounding impacted communities. We feel that we will eventually be impacted by these training activities, inadvertent activities and associated accidents.</p> <p>We are concerned that the stated goal of this program — aircrew proficiency in urban warfare simulation — does not appear to be fully supported by the currently proposed on-the-ground operations. We are concerned that eventually, to meet its mission, the Air Force will need to modify plans and begin to enter buildings, use urban parks and increase impacts to our community. The EA does a totally inadequate job of evaluating how operations will impact these communities, including communications networks, noise levels and quality of life.</p> <p>We request additional transparency about the full extent of potential future operations, and request that the well being of communities in this program be fully respected by the Air Force.</p>	S. Robertson	
237	C. Kreider	Public	<p>Thank-you for the opportunity to comment on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. From 1982-1987, I lived in Boise's north-end and I currently live in La Grande, Oregon. I have family and friends in Boise and come to Boise on a monthly basis for business and medical services. The potential impact of the Air Force's proposed training activities on the quality of life in Boise as well as the negative impacts of noise and safety on the thriving population and surrounding environment is extremely concerning.</p>	S. Robertson	Thank you for your comment.
238			<p>Establishment of the Urban CAS in Boise and other communities represents a significant expansion of the Mountain Home Air Force Base's training range. Such an expansion warrants a more detailed</p>	S. Robertson	Thank you for your comment. Please see responses to Comments 13 and 19 .

Comment Response Matrix

Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

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			<p>analysis of environmental impacts and alternatives through an expanded NEPA process and full Environmental Impact Statement (EIS.) Some of my specific concerns about the proposed activities are as follows:</p> <p><u>Noise:</u> I have lived near airports and a Strategic Air Command (SAC) Air Force base back east. The noise from air traffic needs a much more thorough analysis because they are NOT insignificant effects. The Air Force acknowledges that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single training event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. The noise duration for these events is in no way comparable to that of commercial airliners. Your whole body shakes and no conversation can occur. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities.</p> <p><u>Air Quality:</u> Boise has significant air quality issues in both winter and summer due to inversions, smoke and dust. Boise does not need additional pollutants that are unnecessary, unhealthy and contribute to greenhouse gas emissions too. These cumulative effects must be analyzed and considered in a full EIS.</p> <p><u>Health and Safety:</u> In addition to noise and air quality, mentioned above, the Air Force's plan does not take into account the full range of health and safety concerns for a growing population the size of Boise. Accidents happen and flying complex military jets loaded with fuel over densely populated areas greatly increases the catastrophic impacts of an inevitable accident. Local emergency preparedness is not fully equipped or funded for such catastrophic incidents. And, as the airport continues to grow and expand creating cumulative risks, a more in-depth analysis, like an full EIS, is warranted.</p> <p><u>Biological Resources:</u> The EA is also dismissive of impacts to biological resources. While there are no direct disturbances on the ground, the assertion that there are no impacts to wildlife is and erroneous statement. The impact of increased noise levels on wildlife, in particular on nocturnal species, migratory birds and bats, must be</p>		

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Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
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			<p>thoroughly studied.</p> <p><u>Livestock</u>: Similar to the impacts on biological resources, impacts on livestock and the range economy must be studied. Regardless of the lack of “on-the-ground” disturbances, noise will have a huge impact on livestock and their viability. This needs further study to determine impacts, as well as appropriate mitigation measures.</p> <p><u>Environmental Justice</u>: The EA does not evaluate issues of Environmental Justice, dismissing concerns from the outset. This is not acceptable! EJ issues—especially with noise and safety—must not be ignored.</p> <p><u>Property Values</u>: There is no way that the property values in Boise and vicinity will NOT be impacted! This needs further investigation and study. What will the impacts be? What will it do to the tax base of the city or surrounding towns and how will it impact their future economic development prospects? What are the alternatives and how can these impacts be mitigated? Quickly, this study becomes complex and I encourage you to commence a full NEPA analysis.</p> <p>In summary, the proposed training activities have the potential to significantly impact the local environment and wildlife; the quality of life, health and safety of the citizens of Boise; the local economy and property values; and it may further impact livestock and the range economy. It doesn't take high level scientists or economists to see the fact that a more thorough analysis of the full range of alternatives is in order. I urge you to please initiate a full NEPA/Environmental impact Statement process, before moving forward.</p>		
239	C. Fabis	Public	<p>1) Thank you for this opportunity to submit comments. I am opposed to the U.S. Air Force's proposal to establish a roughly 175-mile Urban Close Air Support (CAS) Air and Ground Training Zone in southern Idaho. I believe it would negatively effect quality of life in our cities and among our civilian population.</p> <p>Name of Proposal is Misleading. Although the title of the proposal refers to “Training Spaces near Mountain Home, Idaho,” in fact when the proposed training spaces are considered together, they form virtually a contiguous stretch of roughly 175 miles stretching from Burley to Nampa, Idaho.</p> <p>2) Psychological Damage to Military Servicepersons and Area Residents.</p>	S. Robertson	<p>1) Thank you for your comment.</p> <p>2) Thank you for your comment. Please see responses to Comments 8 and 19. Under the Proposed Action, Urban CAS flight activities may be conducted at any one of the urban centers identified as adequate to support the aircrew proficiency training. Thus, flight operations would not be concentrated over any one urban center. Additionally,</p>

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Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

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			<p>Implementation of this proposal would “normalize” simulated urban combat and bombing in American cities. Practicing high-stakes warfare in one’s own home country, and coming to view persons in one’s own country, even one’s own state or city, as “hostile threats” is not healthy psychologically for the military personnel involved. Similarly, having the constant presence of military aircraft overhead could be psychologically damaging for returned veterans, who very well could be in need of respite after multiple tours of duty, or for refugees who have fled from urban warfare and may have been traumatized by bombing by military aircraft. In addition, the proposed activities also “normalize” urban warfare in general and prepare the pilots for bombing in a densely populated area, with its virtually certain attendant civilian casualties and the possibility of being charged with war crimes. These health and safety issues have not been addressed in the Environmental Assessment.</p> <p>3) Inadequate Justification for Use of American Cities and Towns for Combat Practice by Foreign Militaries. USAF Has not demonstrated a need for CAS training in American cities by the Singaporean Air Force. A full one-third of the proposed training operations in the proposal will be conducted by the Singaporean Air Force. USAF has not demonstrated a compelling need for this third of the program, such that it would merit putting Idaho cities at risk for additional noise and air pollution as well as an increased risk of possible aircraft crashes. Is this proposal for training of Singaporean pilots being done primarily for economic purposes? Who benefits financially from this arrangement? A separate environmental publication describes how USAF, at the request of Singapore’s Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. It appears that Singaporean officials are off-shoring their training so that their local residents do not have to suffer from the negative effects of training with the F-15SG’s. It appears that this portion of the proposal seems to be essentially using Idaho cities as a “training ground for hire” and exposing Idaho cities to increased risk primarily for financial purposes. Please explain why Singaporean pilots need to practice with U.S. ground troops. Or, will there be Singaporeans working on the ground to practice with Singaporean pilots, given the proposals references to the need for “integrally linked aircrews and ground support teams (including Joint Terminal Attack Controllers).” Draft FONSI, p. 1. Similarly, the purported need for the proposal is that the “air and ground assets working as one operating unit integrally linked in all communication and coordination efforts to identify, track, and neutralize threats.” It should be noted that the stakeholder letter included in the EA</p>		<p>the 366 Fighter Wing Range Operations would monitor training for compliance with the EA. The information can be obtained by contacting the Mountain Home AFB Public Affairs Office (208-828-6800).</p> <p>3) Please see response to Comment 4.</p> <p>4) Stakeholders and the public were informed that the proposed Urban CAS aircrew proficiency training would involve flight of both the F-15 E and F-15 SG aircraft at the public scoping meetings.</p> <p>5) Section 2.1.1 of the EA specifies the aircraft that would be used to conduct the proposed aircrew proficiency training. As stated in Section 3.1.3 (page 3-9), clearly states that “if aircraft other than F-15E or F-15SG are flown during Urban CAS training in the future, either near Mountain Home AFB or over other urban centers, subsequent NEPA analysis and comprehensive noise modeling would be required to specifically address potential noise impacts of those activities.”</p>

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Mountain Home AFB – Urban CAS Draft EA/FONSI Public Comments

#	Commenter		Comment	Reviewer	Response
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			<p>fails to make any mention of the training by the F-15SG's and the Singaporean Air Force. This is misleading, if not deceptive, because it does not accurately describe the nature of the proposal, which includes one-third of the flights by a foreign military.</p> <p>4) Also, it did not give stakeholders adequate notice of the aircraft involved, as the F-15 and the F-15SG have different environmental impacts.</p> <p>5) Other Aircraft That May be Substituted in at a Later Date. Several other foreign militaries operate their own versions of the F-15. Will USAF be bringing in other foreign militaries in the future to use southern Idaho as a "training ground for hire"? What environmental analysis will be done in that event?</p> <p>6) Improper Segmentation. USAF needs to perform a comprehensive Environmental Impact Statement so that a comprehensive review can be done of the Cumulative Impacts of several USAF proposed activities in southern Idaho, such as those involving the F-35, the embedding of additional F-15SG aircraft, and expansion of training activities at Mountain Home AFB.</p> <p>7) Previous Use of Boise and Other American Cities for Possibly Unpermitted CAS Training. The EA states that "The Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirement." EA 1-6 (emphasis supplied).</p> <p>The fact there is no precedent set for this type of training over a civilian population anywhere in the U.S. should cause alarm to our cities in Southern Idaho. Why would any city want this ongoing training impacting daily life?</p>		

Public Comments Received on the Draft EA

> -----Original Message-----

> From: katie fite <katie@wildlandsdefense.org>

> Sent: Tuesday, September 18, 2018 8:09 PM

> To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

> Cc: katie fite [REDACTED]

> Subject: [Non-DoD Source] Are there Public Meetings on Draft EA for Urban CAS/War Games?

>

> Hello,

>

> Are there going to be public meetings for the Draft EA for Urban CAS?

>

> If so, when will they be?

>

> I request that such meetings be held.

>

> Thank you,

>

> Katie Fite

> WLD

> On Sep 19, 2018, at 3:37 PM, 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil> wrote:

>

> Ms. Fite,

>

> At this time, we do not have plans to hold a public meeting for the draft EA for Urban CAS.

>

> However, if you would like to provide a comment that will be added to public record, you are welcome to send your comments to the Public Affairs office via email or phone:

> Email: 366FW.PA.Public.Affairs@us.af.mil

> Phone: (208) 828-6800

>

>

> Very respectfully,

> 366 Fighter Wing Public Affairs

> Mountain Home Air Force Base

-----Original Message-----

From: katie fite <katie@wildlandsdefense.org>

Sent: Wednesday, September 19, 2018 4:17 PM

To: 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>

Cc: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

Subject: Re: [Non-DoD Source] Are there Public Meetings on Draft EA for Urban CAS/War Games?

Hello 366 FW/PA,

At the last scoping meeting in Boise, members of the public had requested a meeting with the MHAFB Commander.

I then e-mailed requesting such a meeting, but have heard nothing from MHAFB in response to my request.

Can you please check into this?

Katie Fite

WLD

-----Original Message-----

From: 366 FW/PA Public Affairs

Sent: Thursday, September 20, 2018 8:13 AM

To: katie fite <katie@wildlandsdefense.org>; 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>

Cc: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

Subject: RE: [Non-DoD Source] Are there Public Meetings on Draft EA for Urban CAS/War Games?

Ms. Fite,

We do know about your request for a meeting with the Commander, but at this time no meeting is on the calendar and no meeting is planned. However, all the comments and insight you send to us via email or phone will be gathered and presented to the Commander and base leadership as part of the public record mandated by law.

Very respectfully,

366 Fighter Wing Public Affairs

Mountain Home Air Force Base

From: katie fite <[REDACTED]>
Sent: Thursday, September 20, 2018 11:43 AM
To: katie fite <katie@wildlandsdefense.org>
Cc: 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>; SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>; ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE <sheri.robertson@us.af.mil>
Subject: Re: [Non-DoD Source] Are there Public Meetings on Draft EA for Urban CAS/War Games?

Here is the attachment with the e-mail. I apologize for failing to attach it.

Katie Fite
WLD

On Sep 20, 2018, at 11:38 AM, katie fite <katie@wildlandsdefense.org> wrote:

Hello,

Here is a PDF of an e-mail documenting that the request for a meeting with the Commander was made.

I again request a citizen meeting with the MHAFB Commander re: Urban CAS/War Games and the current EA process.

Numerous Boise citizens requested such a meeting at the second Boise Scoping meeting as well. Ms. Robertson and a military officer from MHAFB were present at the meeting.

There are many questions that were asked by the public at the scoping sessions that remain unanswered.

For example, many questions surround the makeup and activities of JTAC. Despite the public at the first scoping meeting requesting a JTAC representative be present, no one from JTAC was present at the second scoping meeting. Now JTAC disguised personnel ground activity appears to have significantly increased in the Draft EA - despite extensive public concern about this JTAC activity.

As another example, the EA information on airspace and airspace use is very confusing.

It is also an enigma why such an unprecedented militarization of civilian spaces across southern Idaho is really required - given that Nellis and other military bases perform Urban CAS training quite proficiently at military withdrawn lands and special sites that do not endanger a large civilian population. This is especially the case given the increased use of simulated activity in training. Certainly a combination of building some tall building shells at MHAFB and/or Saylor Creek, coupled with simulations must be carefully assessed in this process.

Further, the EA makes sweeping assertions about the effects of the plane noise levels on sleep and on people in general that do not really seem to comport with my experience with how disturbing military plane noise levels really are, and human sensitivity to all parameters of sound/noise generated (including infrasound).

The comments I for WLD submitted asked many questions about a Department of Defense Instruction Memo and many other matters that have not been adequately addressed in the EA.

A meeting of concerned citizens with the Commander of the airbase proposing this unprecedented and potentially catastrophically hazardous activity (in the event of a plane crash or other mishap) may help clarify matters.

I also note that this proposal raises serious Constitutional questions in subjecting unwilling citizens to exposure, and in reality participation in, military War Games. Citizens will be used as "Chaos" for the War Games. Images of citizens, vehicles, homes, etc. may appear on devices used by the military in this activity. Plus the noise, pollution, psychological effects/trauma, from relentless Urban War Games over and around one's home, in one's neighborhood, etc. appear to be an unwarranted intrusion into citizen privacy.

Thank you,

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701

> On Sep 20, 2018, at 2:05 PM, 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil> wrote:
>
> Ma'am,
>
> We understand your request for a meeting, but no meeting is scheduled at this time.
>
> However, the feedback you provided is what we're looking for in this public comment period. If you would like to expound on your points in an email, we'll save it in the public record and present it to base leadership. (Or, if you feel your previous email covered your thoughts sufficiently, we can designate that as your official comment, whichever you prefer.)
>
>
> Very respectfully,
> 366 Fighter Wing Public Affairs
> Mountain Home Air Force Base
>

From: Kathryn Railsback [REDACTED]
Sent: Wednesday, September 19, 2018 4:10 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Link to Appendices for Draft EA?

Hello, Ms. Shaver,

I am trying to find Vol. II of the Draft EA. Is it publicly available? Thanks,

Kathy Railsback

--
Kathryn Railsback, Attorney at Law, PLLC
[REDACTED]

CONFIDENTIALITY: This communication, including attachments, is for the exclusive use of the addressee(s) and may contain proprietary, confidential or privileged information. If you are not the intended recipient, any use, copying, disclosure, or distribution or the taking of any action in reliance upon this information is strictly prohibited. If you are not the intended recipient, please notify the sender immediately and delete this communication and destroy all copies. Thank you.

From: Inna S. [REDACTED]
Sent: Wednesday, September 19, 2018 12:09 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban CAS EA

Dear Noelle,

Despite me submitting comments on MH AFB Urban Cas proposal, my name is no longer on the list of people you notified of the EA draft. Please add my email [REDACTED] to the list of people you notify .

Thank you.

Inna Patrick - very much against your immoral proposal to simulate F-15 strikes and bombings of my city and use my kids as props for it.

-----Original Message-----

From: katie fite [REDACTED]

Sent: Friday, September 21, 2018 10:06 AM

To: 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>

Cc: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>; ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE <sheri.robertson@us.af.mil>

Subject: Re: [Non-DoD Source] Are there Public Meetings on Draft EA for Urban CAS/War Games?

Please include the e-mails i have been sending as comments on this process.

We will be sending more comments as well.

Why can;t a meeting be scheduled? The MHAFB headed by a Base Commander proposes to significantly intrude on the lives and wellbeing of nearly a million people across southern Idaho with this unprecedented War Games scheme — and the Commander won't meet with the public and hear their concerns first hand?

Is the Base Commander still a Mr. Kunkel - who appears to have only been in Idaho since Sept. 2017? Perhaps not long enough to understand that many folks here very much value their privacy, peace and quiet.

Please include this e-mail in the record, as well.

Katie Fite
Wildlands Defense

From: Carolyn and Mike [REDACTED]
Sent: Wednesday, September 26, 2018 9:50 AM
To: Rich Sykes <RSykes@mountain-home.us>; Daniel Brennan <DBrennan@mountain-home.us>; Matthew Bundy <MBundy@mountain-home.us>; Jimmy Schipani <JSchipani@mountain-home.us>; Mark Bryant <MBryant@mountain-home.us>
Subject: Proposal for Urban Close Air Support Training by USAF

Good day,

I am contacting you as one of many concerned citizens regarding the recent Environmental Assessment (EA) on the US Air Force's proposal to establish an Urban Close Air Support zone in eight Idaho cities.

Can you please tell me who your point person is for this proposal?

Your city is listed as one of the eight proposed cities for this training. The training is not exclusive to the United States Air Force; this project includes the Singapore military. Their citizens expressed enough concern about this type of training in their country that their military was forced to find another location.

Another concern is this project is proposed as a permanent project - once it moves forward and is approved there is no mechanism to revisit the approval.

Just in case you were unaware or unsure where to find information, both volumes of the environmental assessment can be found at the following location:

<https://www.mountainhome.af.mil/Home/Environmental-News/>

The draft environmental assessment has been released and public comments are being accepted until October 20, 2018.

I, and many other concerned community citizens, look forward to coordinating with you regarding a response to this environmental assessment.

Thank you!

Sincerely,
Michael Stambulis

From: Rich Sykes [<mailto:RSykes@mountain-home.us>]
Sent: Wednesday, September 26, 2018 12:06 PM
To: Carolyn and Mike <[REDACTED]>; Daniel Brennan <DBrennan@mountain-home.us>; Matthew Bundy <MBundy@mountain-home.us>; Jimmy Schipani <JSchipani@mountain-home.us>; Mark Bryant <MBryant@mountain-home.us>
Cc: GILES, TRACY K GS-12 USAF ACC 366 FW/CVE <tracy.giles.3@us.af.mil>
Subject: [Non-DoD Source] RE: Proposal for Urban Close Air Support Training by USAF

Michael,

I want to thank you for reaching out to myself and the council. I know myself and some of the council went to a public meeting here in Mountain Home. It was very informative, and educational. We here in Mountain Home are very proud of our Air Force, and very grateful to have the Singapore squadron here. They bring a very unique demographic to Mountain Home, and we are a better city for having them here. The person I would talk to is Trace Giles at the Air Force. I have CC'd him on this email chain. I want to thank you once again for reaching out to us and have a fantastic day!

Rich Sykes

Mayor
City of Mountain Home
City Hall
P.O. Box 10
160 South 3rd East
Mountain Home, Idaho 83647

T (208) 587-2104
M (208) 350-0272
F (208) 587-2110
www.mountain-home.us



From: GILES, TRACY K GS-12 USAF ACC 366 FW/CVE

Sent: Tuesday, October 16, 2018 1:19 PM

To: Carolyn and Mike [REDACTED]

Cc: Rich Sykes <RSykes@mountain-home.us>; Daniel Brennan <DBrennan@mountain-home.us>; Matthew Bundy <MBundy@mountain-home.us>; Jimmy Schipani <JSchipani@mountain-home.us>; Mark Bryant <MBryant@mountain-home.us>; ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE <sheri.robertson@us.af.mil>

Subject: RE: Proposal for Urban Close Air Support Training by USAF

Michael,

Thank you for sharing your concerns.

Sheri Robertson (cc'd) is our Point of Contact for this proposal and will add your comments for consideration.

Best,

Trace

//SIGNED//

Trace Giles, GS-12, DAF

Community Partnerships Director

Mountain Home AFB, Idaho, 83648

Comm: (208) 828-2116 DSN: 728-2116

Cell: (208) 590-3053

tracy.giles.3@us.af.mil

Pam Aishlin Cedillo, P.G.



September 30, 2018

Noelle Shaver
366 A6 7/A7IE
1030 Liberator
Mountain Home, ID 83648

RE:

NOTICE OF AVAILABILITY DRAFT ENVIRONMENTAL ASSESSMENT DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR THE ESTABLISHMENT OF URBAN CLOSE AIR SUPPORT (CAS) AIR AND GROUND TRAINING SPACES NEAR MOUNTAIN HOME AIR FORCE BASE, IDAHO The document is available for public review and comment from September 14, 2018 through October 14, 2018. Please address written comments to Ms. Noelle Shaver at noelle.shaver@us.af.mil, or by postal mail at: Noelle Shaver, 366 A6 7/A7IE, 1030 Liberator, Mountain Home, ID 83648

Dear Ms Shaver,

Please find herein my strong objections to any audible Air Force flights over urban areas, particularly Boise and especially within the zone wherein hospitals are located. Additional areas to not be flown over are schools, universities and city centers. Fly-overs should especially NOT occur on weekends.

My strong objection is based on the experience earlier this year when jets flew very low over Boise's city center, hospital, university and downtown neighborhoods and schools. This involved numerous flights throughout the day, for more than one day.

The jets flying over were visible and extremely loud, the experience was deeply stressful. I am speaking as one sample of hundreds of citizens packed into a city center who were affected by this outrageous military act. An impact study must involve extensive study of the potential stress impacts across a population, including vulnerable population segments.

It must be specifically considered that the Air Force is not protecting its citizens by terrorizing them.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pam Aishlin Cedillo'.

Pam Aishlin Cedillo

-----Original Message-----

From: katie fite [REDACTED]

Sent: Saturday, September 29, 2018 5:43 PM

To: BORDERS, CHRISTOPHER L Maj USAF ANG JFHQ-ID/CSSA <christopher.borders.1@us.af.mil>; timothy.d.marsano.mil@mail.mil; Mayor Bieter <mayor@cityofboise.org>; Lauren McLean <lmclean@cityofboise.org>; 366 FW/PA Public Affairs <366FW/PA.Public.Affairs@us.af.mil>; Rebecca Hupp <RHupp@cityofboise.org>; SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>; ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE <sheri.robertson@us.af.mil>
Subject: [Non-DoD Source] NOXIOUSLY loud military plane noise today

Hello,

There has been noxiously loud military plane noise terrorizing the citizens of Boise today. Example: 2:10 pm. AND Just now, at 5:32 pm VERY loud plane went by, scaring my dog and making her bolt under a Table.

WHO is responsible for these noxious overflights? Is it the Air Force? Please answer if it is 366 Public Affairs Office. Is it the National Guard? Please answer if it is Mr. Marsano and Mr. Borders.

WhAT type of planes overflew at this time? Where are these planes based?

I request a response.

Also Ms. Shaver, please enter this e-mai of concern into the record as a comment for the Urban CAS War Games EA. Boise's are being subjected to much noxious and unhealthy intrusive military plan noise so as it is.

The adverse cumulative effects of the existing Noxious overflights have not been properly assessed in the self-serving Urban CAS War Game EA.

Adding the chronic noise Hell of Urban War Game overflights would be a major military incursion into the lives of the citizens of this town. An EIS must be prepared.

Sincerely,

Katie Fite
[REDACTED]

-----Original Message-----

From: katie fite [REDACTED]

Sent: Sunday, October 7, 2018 1:58 PM

To: 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>; timothy.d.marsano.mil@mail.mil; Rebecca Hupp <RHupp@cityofboise.org>; Mayor Bieter <mayor@cityofboise.org>; Lauren McLean <lmclean@cityofboise.org>; BORDERS, CHRISTOPHER L Maj USAF ANG JFHQ-ID/CSSA <christopher.borders.1@us.af.mil>; SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>; ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE <sheri.robertson@us.af.mil>
Subject: [Non-DoD Source] incessant Military Plane Noie

Hello,

There has been incessant grinding military plane overflight noise over the North End of Boise this afternoon. This greatly intrudes on quality of life of Boise citizens.

WHAT planes are responsible for this incessant grinding highly ANNOYING noise? WHERE are they based? Why are they dangerously flying over town? Times - 1:01 and many minutes thereafter, 1:38 to the present (1:50).

Is this the Guard or Air Force?

There have also been many military overflights in the past couple days.

A full and detailed accounting of ALL of this highly intrusive currently occurring military plane activity conducted over Boise must be provided in the analysis for the Urban CAS War Games scheme that would unleash an unprecedented military "training" assault on Boise citizens.

Please place a copy of this e-mail in the record as a comment on the Urban War Game EA.

Katie Fite
[REDACTED]

From: Kristin Hasselblad <[REDACTED]>
Sent: Sunday, October 7, 2018 10:49 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban CAS EA, comments

Dear Ms. Shaver,
I am writing to submit concerns I have about this project. Here is a list for your team to consider. Thank you.

1. ***Why are one-third of the training operations for the Singaporean Air Force?*** Is this being done primarily for economic purposes? Who benefits financially from this arrangement? A separate publication describes how USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20.

One Singaporean news story quotes a local politician boasting about protecting his constituents in Singapore from harmful noise pollution from military aircraft. It seems they have shifted this problem to Idaho.

Several other countries operate their own versions of the F-15. What other foreign militaries can be expected to utilize Idaho's new large urban combat zone to avoid unwanted impacts in their own countries? USAF needs to be transparent. In fact, USAF's public outreach letter to stakeholders neglected to mention the Singaporean military planes and only mentioned the US F-15E aircraft.

2. USAF's Urban Close Air Support (CAS) proposal is for an ***open-ended, i.e., permanent urban combat zone in Boise and other Idahoan cities, without any mechanism for review*** to assess how operations in the urban combat zone will affect our rapidly growing area over time. That is, there is no sunset date or specified date to review potentially negative impacts in light of other developments – including other USAF developments – in the state.

3. ***How can the public monitor USAF's compliance with the promised mitigation measures,*** such as limiting the number of flights, the flying altitudes, the extent of ground operations, etc.? In fact, USAF disclosed at the scoping meetings that USAF had *already* been conducting urban combat training in Boise – apparently for years – in violation of environmental requirements.

4. ***USAF has not adequately analyzed the health, safety, and environmental risks*** to humans or wildlife in its draft, and ***has not adequately consulted with public officials*** about these risks. Regarding noise, the U.S. Environmental Protection Agency states that, "Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity."

The World Health Organization states that "children living in areas with high aircraft noise have delayed reading ages, poor attention levels, and high stress levels." USAF's analysis does not appear to include the cumulative impacts of the noise from the aircraft combined with the existing background noise.

USAF calculations also appear to seriously undercount the proposed number of sorties by at least a third and the number of expected aircraft to be flying sorties. The USAF noise calculations need to be seriously analyzed by independent experts.

5. ***Inadequate consultation with public officials, such as state and local law enforcement,*** USAF neglected to notify many of the cities and towns that will be affected, and also many of the state legislative districts.

The AF neglected to consult with the Idaho Department of Environmental Quality on its list of relevant state agencies. Many of the affected cities were not included on the list of stakeholders and the list of state legislators included only two in Idaho and one in Oregon, ignoring numerous legislative districts that are included in the proposed urban combat training zone.

In summary, the list of stakeholders was arbitrary, and there was inadequate consultation with state, local, and federal agencies.

6. USAF ***does not appear to be seriously calculating the cumulative impacts*** of the proposed permanent urban combat zone and other USAF operations in Idaho, such as the proposed F-35. It appears they may be unlawfully segmenting USAF proposals so as to be able to claim that each of them has negligible impacts. USAF's separate analysis of the impacts of the F-35's have not been released.

7. ***How does this proposed permanent urban combat zone – the only one in the U.S. – fit with Boise's goal of being the "Most Livable City in the Country"?*** Boise and surrounding towns within a 17-mile radius will be impacted by increased noise and air pollution, with military aircraft circling overhead in a "wheel" and teams of "friendly" and "hostile" forces simulating warfare in civilian clothing and unmarked vehicles.

8. The EA does not properly consider all socio-economic impacts. ***USAF does not address the psychological impacts on veterans, refugees, and other war survivors of simulated urban warfare*** and the activities mentioned above.

9. ***The USAF does not address the psychological impacts on current servicemembers of waging simulated urban warfare in "the homeland."***

10. ***The USAF has not done an analysis on air or noise quality impact on humans and on wildlife including migratory birds, and domestic animals.***

11. ***Why isn't USAF doing a comprehensive Environmental Impact Statement?*** This EA includes only minimal analysis of the impacts. USAF regulations state that a full environmental impact statement should normally be conducted for expansion of supersonic training ground lower than 18,000 feet (this plan proposes 10,000 feet), yet the USAF has determined an EIS is not necessary.

Please consider these comments and conduct a full EIS for this project. Thank you.

Sincerely,
Kristin Hasselblad
[REDACTED]

From: Judi and Frank <[REDACTED]>
Sent: Monday, October 8, 2018 6:16 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Comments on EA addressing establishment of urban CAS air and ground training spaces in urban centers in Idaho

1. This proposal requires an Environmental Impact Statement. It will have major negative sound impacts and potential negative health and safety impacts on over half a million residents of southwestern Idaho that must be more thoroughly evaluated. Opportunities for scoping, for understanding the details of the proposal, and for providing comments must be widely publicized in advance and provided throughout the area of impact.
2. Noise levels will be high and disturbing. The draft EA describes noise impacts as "overflights will not interfere with communications or awaken individuals from sleep." However, Table 3-5 shows maximum sound levels for F15-E overflights at 70.8 decibels. Table 3-6 shows maximum sound levels for F-15SG overflights as 72.3 decibels. Table 3-1 describes common sounds like a vacuum cleaner indoors at 10 feet with a 70 decibel noise level, and heavy traffic outside at 150 feet also at 70 decibels. Because the decibel scale is logarithmic, 70.8 and 72.3 are a lot louder than 70. But even at 70 decibels, how could anybody possibly sleep with the loud sounds the volume of a running vacuum cleaner suddenly and perhaps repeatedly audible in your bedroom? How could people go about their normal lives outdoors - walking, talking, playing, eating - with these new sounds resembling close by heavy traffic? Most of the proposed operating areas are now very quiet. Even in the urban metropolitan area of Boise, it is absolutely quiet in much of the city all night long. And there are proposed to be well over 1000 hours of training flights.
3. There is a lot of research on the negative health effects on humans and other animals from being subjected to noise over a long period of time. This research needs to be included in the analysis.
4. Socioeconomics- The Treasure Valley is currently one of the fastest growing areas in the country. If word gets out that residents are subjected to the sound of hundreds of military overflights each year and are frequently awakened from sleep by the jets, the desirability of this area may disappear and growth may end or slow. This potential should be analyzed.
5. Inadequate safety analysis. The draft EA looks at the past, when Mtn Home AFB was not operating over urban areas and was not operating in the same airspace as hundreds of private and commercial planes each day, to predict a very low risk of collisions and crashes. This greatly underestimates the risk and likelihood of crashes to a population exceeding 500,000 people, as well as additional people in aircraft. This analysis needs to be redone.
6. The safety aspects of laser damage to humans and animals also needs to be better researched and analyzed. Pilots are not going to think about their elevation when shooting lasers in order to minimize risk. The potential negative effects of different frequencies of radio waves also needs analysis.
7. The no action alternative needs to be expanded. If the proposed action is not implemented, the military is not precluded from designing other training programs that may meet their mission while being less harmful and dangerous to a half million residents. The no action alternative also would have significant positive health and safety benefits to the population that should be described.
8. I have worked on federal land in military operating areas in Idaho and California. I have observed that fighter jets routinely violate the airspace restrictions and fly much, much closer to the ground than is prescribed. Accurately reporting these events to the responsible air base has no effect on pilot behavior and the low flights continue. The low overflights greatly increase noise impacts and safety risks. How would this be addressed?

Military flight training areas are typically located away from urban populations, in isolated rural areas, in order to provide ground separation for noise nuisance and potential accidents. This is practical and that is where these activities need to stay.

Judi Zuckert, [REDACTED] October 8, 2018

From: Deborah Ferguson <DAF@fergusondurham.com>

Sent: Tuesday, October 9, 2018 7:07 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] Comments on Draft EA for Urban CAS Air and Ground Training Spaces, Mountain Home AFB

Dear Ms. Shaver: I object and disagree with the FONSI on the Draft EA for Urban CAS Air and Ground Training Spaces, Mountain Home AFB. Simulating war games in a large urban center such as Boise would have significant impact on the people who live and work in the community, as well as visitors. It would have a negative impact on our large veteran population, many who suffer from PTSD, as well as our significant refugee population who have escaped their own war torn countries. The noise and distraction would also negatively impact schools, universities, businesses, and conventions in Boise. Moreover, the analysis of the impact on wild life is woefully inadequate, in this important urban wildlife interface.

The FONSI should be pulled and a draft EIS initiated for all of these reasons and more. -Deborah Ferguson



Deborah A. Ferguson
Ferguson Durham, PLLC
223 N. 6th Street, Suite 325
Boise, Idaho 83702
www.fergusondurham.com
O: (208) 345-5183, ex. 1
F: (208) 906-8663

Ms. Ferguson is a member of:



THE NATIONAL ACADEMY OF
DISTINGUISHED NEUTRALS

For mediation requests, see www.idahomediategroup.com

From: A.J. Rystad [REDACTED]>

Sent: Wednesday, October 10, 2018 8:30 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] Urban Close Air Support Training in Southwest Idaho

To whom it may concern,

As a resident of Caldwell, I am in support of the U.S. Air Force plans to conduct urban close air support training here in the Treasurer Valley.

Sincerely,
Arnold J. Rystad



Ms. Noelle Shaver
366 A6 7/A7IE
1030 Liberator Street
Mountain Home, Idaho 83648

October 9, 2018

RE: Urban CAS EA – Comments

Dear Ms. Shaver,

Thank-you for the opportunity to comment on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. I have lived in the North End of Boise for 35 years and have grave concerns about the impact of the Air Force's proposed training activities on the quality of life in Boise as well as the surrounding environment.

Establishment of the Urban CAS in Boise and other communities represents a significant expansion of the Mountain Home Air Force Base's training range. Such an expansion warrants a more detailed analysis of environmental impacts and alternatives through an expanded NEPA process and full Environmental Impact Statement. When the Air Force expanded their training activities into the Owyhee Canyonlands of southwestern Idaho in the 1990s they went through multiple analyses and proposals with extensive public involvement. Although the Owyhee expansion involved more direct on-the-ground impacts than the CAS proposal, the current proposal will affect over 300,000 people and should not be rushed through an abbreviated NEPA process that has provided limited opportunities for public input and virtually no public outreach.

Some of my specific concerns about the proposed activities are as follows:

Noise: The Air Force's use of noise averaging over a 24 hour period (DNL) and conclusion that there is no significant impact is ludicrous. The noise impacts are from the individual sorties at the time of the activity. The Air Force does acknowledge that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single training event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. And this may occur on 160 days of the year! The noise duration for these events is in no way comparable to that of commercial airliners. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities.

In Tables 3-5 and 3-6 the Air Force shows the SEL (sound exposure level) of four-aircraft formations to be 70.8 dBA and 72.3 dBA for the F-15E and F-15SG respectively. This is stated to be well below the 90 dBA SEL threshold for sleep interference. According to whom? As someone who is a very light sleeper and enjoys sleeping with my windows open, I am very concerned about having my precarious sleep

disrupted by the sounds of F-15s. The needs of people with sleeping disorders and challenges need to be taken into account when considering noise levels that are found to be disruptive.

Air Quality: Boise has significant air quality issues, particularly during the winter when inversions trap pollutants in the valley and during the summer when winds frequently bring smoke from wildfires into the region. We do not need additional pollutants that are unnecessary. This is becoming a significant health issue for many residents of the valley. The Air Force should be precluded from training exercises in the region during periods when the air quality is poor.

Furthermore, the EA states that there will be no net increase in greenhouse gas emissions as a result of their training range expansion because they are offset by reductions in emissions associated with current training exercises. However, this fails to account for increased travel distances for training which will result in the burning of more fuel and a net increase in emissions. Training locally and training in dispersed areas cannot be equated on a one-to-one basis.

Health and Safety: The Air Force's plan for safety is to not have any accidents. We all know that is an impossibility – accidents happen and flying complex military jets loaded with fuel over densely populated areas greatly increases the catastrophic impacts of an inevitable accident. If problems arise, pilots are allowed to jettison their fuel over 'unpopulated areas'. Is that the Boise Foothills, Bogus Basin or perhaps the desert south of town where people go to recreate? There is nowhere within the training circle around Boise that is not inhabited or used by local residents so where will they jettison their fuel if the unexpected happens and a pilot suddenly needs to lighten his/her load?

The EA describes the emergency services available from the impacted municipalities. Why is it their responsibility to deal with the mishaps from the Air Force? Does the Air Force intend to provide additional funding to communities for enhanced emergency services to deal with an Air Force caused disaster?

Similarly, the Air Force contends that the 'eye-safe' lasers used in their training operations won't cause any harm as long as it has been properly put into the 'training' mode as opposed to the 'combat' mode. Again, the finding of no significant impact is based on the assumption that an error will never occur. Are citizens expected to gamble their vision on the belief that the military never makes a mistake?

And finally, there is the simple fact that as Boise continues to grow the airport has also continued to expand operations and add commercial flights. The addition of Air Force training exercises will only exacerbate the problems of growth and increase the risk of a disaster resulting in the loss of life.

Environmental Justice: The EA does not evaluate issues of Environmental Justice, dismissing concerns from the outset based on their assertion that noise impacts averaged over a 24-hour period are negligible. However, they did not consider the affect of the noise and visual displays of fighter jets on people suffering from PTSD. This group includes not only veterans but also many of the refugees now living in Boise who have come here to escape violence and war in their home countries. The adverse impact of Air Force activities on these vulnerable residents of our community need to be given serious consideration in an EIS.

Biological Resources: The EA is also dismissive of impacts to biological resources. While there are no direct disturbances on the ground, the assertion that there are no impacts to wildlife is erroneous. The impact of increased noise levels, particularly at night when it is otherwise relatively quiet, need to

be more thoroughly examined. Potential disruption to the behavior of sensitive nocturnal species such as bats and owls should be considered in an EIS.

The EA also discounts impacts to migratory birds by claiming that since the overall number of air operations will remain the same, the impacts of Air Force training activities are also the same. This ridiculous assertion completely ignores the fact that the proposed activities will impact a different geographic area and therefore have the potential to disrupt other corridors for migratory birds. The Intermountain Bird Observatory located to the east of Boise and within the training circle is an example of the types of areas adversely impacted by this proposal. A comprehensive analysis of migratory corridors within the expanded training area needs to be conducted.

In summary, the proposed training activities have the potential to significantly impact the local environment and quality of life, health and safety of the citizens of Boise. Before moving forward with the proposed actions, a thorough analysis of impacts and training alternatives must be conducted in an Environmental Impact Statement.

Thank-you for the opportunity to comment.



Amy Haak

From: Anne Hausrath [REDACTED]
Sent: Wednesday, October 10, 2018 12:42 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] comments on EA for Close Air Support

Dear Ms. Shaver:

Attached are my comments on the EA for Close Air Support. Please include them in the public record. Thank you. Sincerely, Anne Stites Hausrath

--
Anne Stites Hausrath
[REDACTED]

EA CLOSE AIR SUPPORT: Comments by Anne Hausrath, [REDACTED]

Dear Sir or Madam:

I urge you to do a full Environmental Impact Statement for this proposed project in order to address the contradictions and fill in the omissions of the current Environmental Assessment.

The following are some concerns which need to be addressed:

Key stakeholders do not appear to have been included in the original scoping efforts for evaluation of the proposal and comment:

Idaho Department of Environmental Quality

Idaho State Representatives and Senators from all the southern Idaho affected districts, including all of Boise's legislative districts

There has not been adequate public notice or any serious public involvement process. The two public scoping meetings in Boise were held with very little advance notice.

The project appears to be open-ended with no sunset clause. What means of evaluation do you propose? How are elected officials at the federal, state, and local level going to be involved in that evaluation?

What is the proposed benefit to American citizens or the residents of southern Idaho of having one third of the pilots be from the Singapore Air Force?

If in the future the Air Force were to propose to increase the number of foreign pilots or pilots from another nation, what process do you propose to follow for stakeholder input? Will you do an additional Environmental Assessment? Or Environmental Impact Statement?

What is the benefit of having foreign pilots from Singapore communicating with American ground crews from southern Idaho? You state that practice in coordination is crucial yet when in any possible warfare scenario would American ground crews be coordinating with pilots from Singapore? This inconsistency needs to be addressed!

You propose to have planes flying over the city of Boise and ground support teams on the streets potentially for over one third of the year. How specifically do you plan to coordinate with the Boise Police Department regarding position of the ground teams? How many hours of local police time do you expect will be needed for this coordination?

In the first part of Vol. I you state that ground crews may enter buildings or may need to get to upper floors of buildings. Later in Volume I you state that ground crews will not go into buildings. This serious contradiction needs to be addressed. Will they or will they not be entering buildings?

You state that there may need to be some adjustment of local flight patterns. How specifically do you plan to coordinate with the Boise Airport personnel?

You state that combat lasers will never be used because there is a switch that will never be turned on. How do you reassure us, the residents, that human error will never allow the mistake of flipping that

switch?

You state that there will be some long term adverse effects regarding noise and air pollution. How do you plan to monitor those effects? What metrics do you plan to use? What modeling have you done to include cumulative effects related to population growth in southern Idaho and the Boise area, increased wildfires and smoke?

This is by no means an exhaustive list of the issues that need to be included in a full Environmental Impact Statement.

I am dismayed that many of these questions and issues were raised last spring during the poorly advertised scoping process, are documented in Vol. II Appendices and yet have not been addressed in this Environmental Assessment.

If indeed this proposal is as important as you say it is, it deserves a much better public review.

Sincerely,

Anne Stites Hausrath



From: Kevin Cahill <[REDACTED]>
Sent: Wednesday, October 10, 2018 8:44 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] comment on Urban CAS EA

Kevin E. Cahill, PhD
[REDACTED]

Ms. Noelle Shaver
RE: Urban CAS EA
366 A6 7/A7IE
1030 Liberator
Mountain Home, ID 83648
noelle.shaver@us.af.mil

Dear Ms. Shaver:

My name is Kevin E. Cahill and I am a PhD economist who lives in Boise, Idaho. I reviewed the Urban CAS EA and, as a professional, doctoral-level economist, I find it to be grossly insufficient with regard to its analysis of socioeconomic impacts, failing to meet even the most minimum standards of custom and practice in the field of economics.

Below please find an article I wrote that explains my conclusions about the EA. This article was published recently in the Idaho Statesman.

I love my country, and feel ashamed that such an analysis would be passed off by our military as being adequate. I urge you to do a valid socioeconomic impact analysis that takes into account both the costs and the benefits of the proposed action. If not, I will have no choice to continue expressing my professional opinion in public.

Sincerely,

Dr. Kevin E. Cahill

The Air Force's Blind Eye to the Socioeconomic Impact of Urban Close Air Support in Boise

By Kevin E. Cahill, PhD

On Friday the Air Force issued an Environmental Assessment (EA) to establish Urban Close Air Support (CAS) training in Boise, and reached a finding of no significant impact (FONSI). The technical terms throughout the EA obfuscate what this actually is but, in lay terms, the Air Force is proposing war simulations in downtown Boise with teams posing as "hostile threats" on the ground and fighter jets responding to the threat in close proximity. Such a policy is concerning on many levels, but one aspect of the EA that is simply inexplicable is the lack of any assessment of the socioeconomic costs to Boise and the surrounding areas.

To be clear, the EA contains a section called, "Socioeconomics." But this section merely states: "The Proposed Actions and No Action Alternative would not include any activities that would require the temporary employment or relocation of workers." As a result, "... impacts on socioeconomics at the nine urban centers would not be expected." That's the Air Force's "analysis" of socioeconomic impacts—assume the costs are zero. Not surprisingly, when you assume costs are zero, you reach a conclusion of no significant impact.

Stating the obvious, good economic analysis consists of more than just assuming that the costs of an activity are zero. Especially when they are not. What is more, of the nine "urban" centers listed in the EA (Boise, Mountain Home, Twin Falls, Burley, Grand View, Glenns Ferry, Bruneau, Mountain Home AFB, Hammet), Boise is by far the largest and the one most certainly capable of providing the Air Force its desired "realities of urban combat." So fighter jets will be within "close proximity" (as low as 10,000 feet) of downtown Boise, with actors embedded in public areas as targets for the fighter jets. The Air Force asserts that these activities will not impact the way we live and work in Boise. Economically, this assertion is utter nonsense.

A region's economy depends critically on the ability to attract and retain high-quality workers and employers. Cities and states compete aggressively to attract both. One only need to think of the recent scramble among cities for Amazon's second headquarters to know how this takes place. More generally, cities tout their strategic advantages. Boston has its elite educational institutions; New York is a global financial center; Washington, DC has its political connections; Los Angeles has fabulous weather and Hollywood. What do we have in Boise? Arguably, the best quality of life in the nation. Our quality of life in Boise is a resource that allows us to thrive.

The Air Force's proposal for CAS will negatively impact Boise's most valuable resource, and any reasonable interpretation of the EA would suggest that the negative impact is going to be large. People will be less likely to come downtown, harming businesses; students will be distracted, posing yet one more hurdle to learning; and veterans seeking mental health services from our regional VA medical center could have PTSD episodes triggered. For all of us, having fighter jets swirling around the area, looking for a hostile target downtown, will affect our ability to enjoy the foothills, the Greenbelt, Ann Morrison Park, or any of the other wonderful places we visit on a regular basis.

Making trade-offs is a key part of economic analysis. The Air Force's CAS policy has benefits to our military. The CAS proposal also has costs. For the Air Force to simply assume these costs are zero is not acceptable. We need to demand a decent socioeconomic analysis. If not, the socioeconomic costs will be set equal to zero, by assumption, and the Air Force will conclude that the benefits, however large, will outweigh the costs (\$0). That's just bad economics.

From: Barbra Smith - [REDACTED]
Sent: Wednesday, October 10, 2018 12:27 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] FONSI to Urban CAS Air and Ground training in/over Boise, ID

Dear Ms. Shaver,
I'm strongly opposed to the findings of FONSI and to the possible Urban CAS Air and Ground Training Spaces in and over Boise, Idaho.

I find it impossible that your EA resulted in no significant impact.
As noted, I am strongly opposed, it will have a significant impact to Boise residents -people and animals.

I do not chose to live in a war zone -even simulated ones! Your report states that your air and ground training would adequately simulate current mission realities of urban combat - that means Boise residents would experience a combat zone.
The noise and tension and invasion of my living space is not acceptable or wanted.

The aircraft at 10,000 feet would produce a noise level that is unacceptable to me and my dog. When your Thunderbird's were in Boise last year, the low level flyovers and the loud and sustained jet noise put my dog into a trembling state. He thought the noise was thunder. He was so scared he trembled and cried FOR THREE MONTHS afterwards every time he heard any jet noise. Might sound meaningless to your group but for all the dogs and their owners it is a big deal.

This plan will have a significant impact to everyone in the Boise area - we do not want to live in an urban combat zone, just because we are convenient to MHAB doesn't make it your right to "invade".
Barbra Smith
[REDACTED]

From: Daniel Hill - [REDACTED]
Sent: Wednesday, October 10, 2018 1:00 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [EEMSG-SPAM: Suspect][Non-DoD Source]

Dear Ms. Shaver,

I strongly object to the proposed war games over Boise and neighboring SW Idaho cities. The noise would be very problematic for all residents, particularly our large refugee and veteran populations. A proper Environmental Impact Statement is in order, at the very least.

Thank you,

Daniel Hill - Boise resident.

From: Marsha Lane - [REDACTED]
Sent: Wednesday, October 10, 2018 9:36 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>; noell.shaver@us.af.mil
Subject: [Non-DoD Source] Feedback on Scheduled War Games

I read in the Idaho Press Tribune that you are soliciting feedback regarding the planned war games/training exercises.

I wholeheartedly agree with the need to practice urban CAS and encourage the Air Force to "train like we fight." A well-prepared, well trained military is essential to our nation's self-defense.

Thank you for protecting our nation.

From: Sharon Lewis [REDACTED]
Sent: Wednesday, October 10, 2018 10:07 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban War Games

I am in favor of the urban war games you are going to perform in Idaho. Thank you for your service.
Sharon Lewis
Nampa, Idaho

From: Richard Reimann [REDACTED]
Sent: Wednesday, October 10, 2018 1:45 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Real canyons

To whom it may concern:

Please avoid the annoyance and potential danger created by the Air Force's plan for training in the "urban canyons" of Boise. Most of this training can be accomplished with flights through Bruneau Canyon and in the City of Rocks near Burley.

Thank you for considering this alternative.

R. J. Reimann
Emeritus Professor of Physics
[REDACTED]

From: Jordan Morales [REDACTED]
Sent: Wednesday, October 10, 2018 3:53 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Opposition to Military Training Over City of Boise

Good Afternoon,

First and foremost, thank you for your service. I greatly appreciate the professionalism and training our servicewomen and servicemen adhere to in an effort to prepare to protect this county.

I've been alarmed by the lack of citizen involvement solicited for recent proposals such as basing the F35 at Gowen Field (I know, that's not USAF) and these training exercises which I'm writing to provide public comment in opposition. The biggest concern is the lack of a pilot program where such proposals are run for a week or two so residents can get a real feel and listen for what the impacts will be on our communities. I think before the USAF is given permanent approval for these exercises, that there should first be approval for a pilot with a short timeframe. Then we can really see how this proposal really *sounds*.

Best regards,
Jordan Morales

10/10/18
I WAS AWARE OF YOUR PAST PUBLIC MEETINGS
BUT DID NOT ATTEND. NOW THAT I SEE YOU ARE
FACING OPPOSITION, I WANTED TO SUPPORT THE
AIR FORCE'S DECISION TO GO FORWARD WITH THE
URBAN TRAINING.

I AM PROUD OF THE MILITARY AND ITS
MEMBERS AND AM GRATEFUL BOISE CAN HELP IN
THIS SMALL WAY WITH THEIR PREPARATIONS —
JILL NEWTON, [REDACTED]
BOISE, ID 83706

From: Roger Rosentreter [REDACTED]
Sent: Thursday, October 11, 2018 9:07 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Comments on the Draft EA addressing Urban Close Air support and Ground training

My comments are attached.

Roger

Roger Rosentreter PhD
[REDACTED]

Roger Rosentreter PhD

October 11, 2018

Ms. Noelle Shaver
366 A6 7/A7IE
1030 Liberator Street
Mountain Home, Idaho 83648

Subject: Draft Environmental Assessment (EA) for the proposed Establishment of Urban Close Air Support (CAS) and Ground Training Spaces Comments:

Dear Ms. Shaver:

Thank-you for the opportunity to comment on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. I have lived in the Treasure Valley for 40 years. First and foremost, I urge you to complete a full Environmental Impact Statement for this proposed project. Such an expansion of military training warrants a more detailed analysis of environmental impacts and alternatives through an expanded NEPA process and full Environmental Impact Statement. Additional concerns:

1. The proposal is for jets to fly over the city of Boise and for ground support teams to be on the streets for more than one third of the year. How specifically do you plan to coordinate with the Boise Police Department and other Emergency Services personnel regarding position of the ground teams? How many hours of local police time do you expect will be needed for this coordination? The EA describes the emergency services available from the impacted municipalities. Will it be these municipalities' responsibility to deal with potential mishaps from the Air Force? Does the Air Force intend to provide additional funding to communities for enhanced emergency services to deal with an Air Force caused disaster?
2. The Air Force contends that the 'eye-safe' lasers used in their training operations won't cause any harm **as long as** it has been properly put into the 'training' mode as opposed to the 'combat' mode. Again, the finding of no significant impact is **based on the assumption that an error will never occur**. You state that combat lasers will never be used because there is a switch that will never be turned on. How do you reassure us, the residents, that human error will never allow the mistake of flipping that switch?
3. You state that there will be some long-term adverse effects regarding air pollution. How will these effects be monitored? What modeling have you done to include cumulative effects related to population growth in southern Idaho and the Boise area, increased wildfires and smoke? The Treasure Valley already has significant air quality issues, particularly during the winter when

inversions trap pollutants in the valley and during the summer when winds frequently bring smoke from wildfires into the region. We do not need additional pollutants that are unnecessary. This is becoming a significant health issue for many residents of the valley. The Air Force should be precluded from training exercises in the region during periods when the air quality is poor.

4. You state that there will also be some long-term adverse effects regarding noise pollution. The Air Force's use of noise averaging over a 24 hour period (DNL) and conclusion that there is no significant impact is illogical. The noise impacts are from the individual sorties at the time of the activity. The Air Force does acknowledge that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single training event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. And this could occur 160 days of the year. This alone should trigger an EIS!!! The noise duration for these events is in no way comparable to that of commercial airliners. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities. As a resident of SE Boise for more than 40 years, I do not remember jet noise like what we have experienced for the past month, which is apparently due to transient military aircraft that have a contract with the Jackson Jet Center to use their ramp space at the Boise Airport for training. It has been disruptive and disconcerting, even though it has primarily taken place Fridays-Sundays. I cannot imagine what it will be like to live here in the future, should the proposed action be approved. I believe it will be intolerable.

5. There has not been adequate public notice or serious public involvement. The two public scoping meetings in Boise were held with **very little advance notice**, i.e. just a few days, and the one I attended was on a Friday night. There was only one member of the State Legislature and one Boise City Council member in attendance. Two days before that meeting, it was rumored that the Boise City Council and Mayor had also just heard about the meeting. Key stakeholders do not appear to have been included in the original scoping efforts for evaluation of the proposal. Idaho Department of Environmental Quality staff and Idaho State Representatives and Senators from all the southern Idaho affected districts, including all of Boise's legislative districts, need to be involved.

6. You state that there may need to be some adjustment of local flight patterns. How specifically do you plan to coordinate with the Boise Airport personnel? The simple fact is that as Boise continues to grow the airport has continued to expand operations and add commercial flights. The addition of Air Force training exercises will only exacerbate the problems of growth and increase the risk of a disaster resulting in the loss of life.

7. The EA is dismissive of impacts to biological resources. While no direct, on-the-ground disturbances are proposed, the assertion that there will be no impacts to wildlife is flawed. The impact of increased noise levels, particularly at night when it is otherwise relatively quiet, need to be more thoroughly examined. Potential disruption to the behavior of sensitive nocturnal species such as **bats and owls should be considered in an EIS**. The EA discounts potential impacts to migratory birds by claiming that since the overall number of air operations will

remain the same, the impacts of Air Force training activities are also the same. This assertion ignores the fact that the proposed activities will impact a different geographic area and therefore have the potential to disrupt other corridors for migratory birds. The Intermountain Bird Observatory and the Morley Nelson Birds of Prey National Conservation Area are both located within the proposed training area, and thus a comprehensive analysis of migratory corridors within the expanded training area needs to be conducted. The proposed training activities have the potential to significantly impact our quality of life, and the health and safety of citizens and wildlife, not just in Boise but throughout the larger "action area". I urge you to do the thorough analysis that is needed by preparing an **Environmental Impact Statement**. Thank you for the opportunity to comment.

Thank you

Roger Rosentreter PhD.

From: Ann DeBolt [REDACTED]
Sent: Thursday, October 11, 2018 7:59 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Comments on the Mountain Home AFB Draft EA for CAS and Ground Training Spaces

Dear Ms. Shaver: Please find my comments on the Draft CAS EA attached to this email.
Thank you for the opportunity to comment.

Ann DeBolt

Ann DeBolt

October 11, 2018

Ms. Noelle Shaver 366 A6 7/A7IE
1030 Liberator Street
Mountain Home, Idaho 83648

Subject: Draft Environmental Assessment (EA) for the proposed Establishment of Urban Close Air Support (CAS) and Ground Training Spaces Comments

Dear Ms. Shaver:

Thank-you for the opportunity to comment on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. I have lived in the Treasure Valley for 32 years. I am writing out of deep concern re. the EA and the proposed actions. First and foremost, I urge you to complete a full Environmental Impact Statement for this proposed project. Such an expansion of military training warrants a more detailed analysis of environmental impacts and alternatives through an expanded NEPA process and full Environmental Impact Statement.

Additional concerns:

1. The proposal is for jets to fly over the city of Boise and for ground support teams to be on the streets for more than one third of the year. How specifically do you plan to coordinate with the Boise Police Department and other Emergency Services personnel regarding position of the ground teams? How many hours of local police time do you expect will be needed for this coordination?

The EA describes the emergency services available from the impacted municipalities. Will it be these municipalities' responsibility to deal with potential mishaps from the Air Force? Does the Air Force intend to provide additional funding to communities for enhanced emergency services to deal with an Air Force caused disaster?

2. The Air Force contends that the 'eye-safe' lasers used in their training operations won't cause any harm as long as it has been properly put into the 'training' mode as opposed to the 'combat' mode. Again, the finding of no significant impact is based on the assumption that an error will never occur. You state that combat lasers will never be used because there is a switch that will never be turned on. How do you reassure us, the residents, that human error will never allow the mistake of flipping that switch?

3. You state that there will be some long-term adverse effects regarding air pollution. How will these effects be monitored? What modeling have you done to include cumulative effects related to population growth in southern Idaho and the Boise area, increased wildfires and smoke? The Treasure Valley already has significant air quality issues, particularly during the winter when inversions trap pollutants in the valley and during the summer when winds frequently bring smoke from wildfires into the region. We do not need additional pollutants that are unnecessary. This is becoming a significant health issue

for many residents of the valley. The Air Force should be precluded from training exercises in the region during periods when the air quality is poor.

4. You state that there will also be some long-term adverse effects regarding noise pollution. The Air Force's use of noise averaging over a 24 hour period (DNL) and conclusion that there is no significant impact is illogical. The noise impacts are from the individual sorties at the time of the activity. The Air Force does acknowledge that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single training event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. And this could occur 160 days of the year. This alone should trigger an EIS!!! The noise duration for these events is in no way comparable to that of commercial airliners. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities. As a resident of SE Boise for more than 25 years, I do not remember jet noise like what we have experienced for the past month, which is apparently due to transient military aircraft that have a contract with the Jackson Jet Center to use their ramp space at the Boise Airport for training. It has been disruptive and disconcerting, even though it has primarily taken place Fridays-Sundays. I cannot imagine what it will be like to live here in the future, should the proposed action be approved. I believe it will be intolerable.

5. There has not been adequate public notice or serious public involvement. The two public scoping meetings in Boise were held with very little advance notice, ie. just a few days, and the one I attended was on a Friday night. There was only one member of the State Legislature and one Boise City Council member in attendance. Two days before that meeting, it was rumored that the Boise City Council and Mayor had also just heard about the meeting. Key stakeholders do not appear to have been included in the original scoping efforts for evaluation of the proposal. Idaho Department of Environmental Quality staff and Idaho State Representatives and Senators from all the southern Idaho affected districts, including all of Boise's legislative districts, need to be involved.

6. You state that there may need to be some adjustment of local flight patterns. How specifically do you plan to coordinate with the Boise Airport personnel? The simple fact is that as Boise continues to grow the airport has continued to expand operations and add commercial flights. The addition of Air Force training exercises will only exacerbate the problems of growth and increase the risk of a disaster resulting in the loss of life.

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The EA discounts potential impacts to migratory birds by claiming that since the overall number of air operations will remain the same, the impacts of Air Force training activities are also the same. This assertion ignores the fact that the proposed activities will impact a different geographic area and therefore have the potential to disrupt other corridors for migratory birds. The Intermountain Bird Observatory and the Morley Nelson Birds of Prey National Conservation Area are both located within the proposed training area, and thus a comprehensive analysis of migratory corridors within the expanded training area needs to be conducted.

The proposed training activities have the potential to significantly impact our quality of life, and the

health and safety of citizens and wildlife, not just in Boise but throughout the larger "action area". I urge you to do the thorough analysis that is needed by preparing an Environmental Impact Statement.

Thank you for the opportunity to comment.

Sincerely, Ann DeBolt

From: Kathleen Mercer [REDACTED]
Sent: Thursday, October 11, 2018 12:32 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] War Games in Idaho

I have read through the environmental assessment, and am thoroughly opposed to the potential impact on residents in Boise and surrounding areas. The military should structure needed training in some other way. Kathleen Mercer, [REDACTED]

From: ROGER & PAMELA PIPER-RUTH [REDACTED]
Sent: Friday, October 12, 2018 10:21 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Comments on USAF Urban CAS Training

Comments on USAF Urban CAS Training

Ms. Noelle Shaver
RE: Urban CAS EA
366 A6 7/A7IE
1030 Liberator
Mountain Home, ID 83648

Hello,

We are very concerned about the proposed United States Air Force Urban Close Air Support training. We are against making Boise and much of southern Idaho into a military training area.

It is our understanding that this would be the only permanent urban combat training zone in the country. How does this fit with Boise's goal of being the "Most Livable City in the Country"? Boise and surrounding towns will be impacted by increased noise and air pollution, with military aircraft circling overhead and teams of "friendly" and "hostile" forces simulating warfare in civilian clothing and unmarked vehicles. This could cause real confusion and danger for our citizens.

The proposal is for an open-ended, permanent urban combat zone without mechanism for review to see how this training is affecting our rapidly growing area. There is no specified date to review potentially negative impacts. We do not think this is acceptable.

We are very concerned about the psychological impacts on veterans, refugees, and other war survivors of this simulated urban warfare. Boise is well known for the amazing work it does with refugees. It just doesn't make any sense to expose anyone to sights and sounds that would traumatize them due to their past experiences.

We are concerned that a full Environmental Impact Statement has not been conducted. USAF regulations state that a full environmental impact statement should normally be conducted for expansion of supersonic training ground lower than 18,000 feet (this plan proposes 10,000 feet), yet the USAF has determined an EIS is not necessary. We think a full EIS should be conducted.

We understand that one-third of the training operations is for the Singaporean Air Force. We do not want our citizens to have to suffer the ills of noise and air pollution and the other negative things mentioned above for the benefit of a foreign nation. We do not believe that we as a city, state or nation benefit from this arrangement. A publication says that the USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20.

Thank you for hearing our concerns. We appreciate your help on this.

Sincerely,

Roger and Pamela Piper-Ruth
[REDACTED]

October 12, 2018

Ms.Noelle Shaver

RE: Urban CAS EA

366 A6 7/1A71E

1030 Liberator

Mountain Home ID 83648

Dear Ms. Shaver,

Thank you for the opportunity to comment on the urban combat exercise proposal for Boise.

I do not support the proposal to conduct urban combat exercises in Boise. I believe the proposal would have a tremendous negative impact on the quality of life in Boise and directly contradicts the expectation that Boise is a safe, inviting city.

I urge the Air Force to select the No Action alternative and formally abandon this proposal.

Sincerely,



Craig Gehrke



-----Original Message-----

From: Matt Denning [REDACTED]
Sent: Friday, October 12, 2018 7:30 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] CAS Operations over Boise

I am opposed to F-15's operating over Boise. I presume they will be landing and taking off from the Boise Airport/Gowen Field? Touch and Go's? The energy and noise impact is intense for all living in the flight paths, my neighborhood included. I am concerned for everyone living here, our peaceful quality of life. A-10's are imperceptible in comparison. Potential for PTSD triggers for veterans, me included, and refugees is another important concern. Urban militarized operations in our community is also cause of more concern. I understand the need for training both for ground and air crews, but the impact is too high for our community. Thank you.

Matt Denning
[REDACTED]

From: Dale Reynolds [REDACTED]
Sent: Friday, October 12, 2018 1:17 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Draft Urban CAS EA Comments

Ms. Shaver, attached are our comments and concerns to the Draft Urban CAS EA. Please keep us informed of any developments at this email. Thanks, Dale and Meg.

Dale Reynolds
Meg Fereday

Ms. Noelle Shaver
366 A6 7/A7IE
1030 Liberator Street
Mountain Home, Idaho 83648

October 12, 2018

RE: Urban CAS EA – Comments

Dear Ms. Shaver,

We have many concerns about the Draft Environmental Assessment on the proposed Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. This draft is incomplete and does not address all the issues of concern. A complete Environmental Impact Statement should be completed allowing more time for investigations, public input and training alternatives.

Meg and I grew up in the Treasure Valley and have lived here all of our lives (64 and 59 years respectively). We have grave concerns about the impact of the Air Force's proposed training activities on the quality of life in Boise as well as the surrounding environment. Boise has been seeing rapid growth, infrastructure problems, and air quality concerns. This proposal would impact us directly and we do not support this proposal.

Our list of concerns include:

Noise pollution - (Averaging noise over a 24 hour period should not be applicable.)

Air Quality - (Boise already has air quality issues.)

Site - (We do not need more jet trails covering our sky.)

Traffic - (Boise already has traffic problems.)

Migratory birds - (Many migratory birds fly over Treasure Valley heading south in the winter and north in the spring. These birds are flying at various elevations.)

Biological harm – (Effects to wildlife in the area.)

Health and Safety Issues - (More air and vehicle traffic. Problems with people suffering PTSD.)

Boise tourism- (This proposal could limit Boise as a destination spot.)

In summary, this proposed training activities has many issues that concern us. We believe this proposal will impact our lives directly. Please look at alternatives and perform a complete EIS. The Air Force has many training sites that do not affect a population of 300,000 people. This training should be done in a simulator or an isolated location away from any cities or towns.

Sincerely,

Dale Reynolds and Meg Fereday

From: john wheaton [REDACTED]
Sent: Saturday, October 13, 2018 9:53 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban CAS EA – Comments

Attached are my comments regarding the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho.

Thank you for the opportunity to provide comments.

John Wheaton
[REDACTED]

Ms. Noelle Shaver
366 A6 7/A7IE
1030 Liberator Street
Mountain Home, Idaho 83648

October 13, 2018

Regarding: Urban CAS EA – Comments

Dear Ms. Shaver,

Thank-you for the opportunity to comment on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. I have lived in Boise for 28 years and have grave concerns about the impact of the Air Force's proposed training activities on the quality of life in Boise as well as the surrounding environment.

Establishment of the Urban CAS in Boise and other communities represents a significant expansion of the Mountain Home Air Force Base's training range. Such an expansion warrants a more detailed analysis of environmental impacts and alternatives through an expanded NEPA process and full Environmental Impact Statement.

I have specific concerns:

Noise: The Air Force's use of noise averaging over a 24 hour period (DNL) and conclusion that there is no significant impact is irrelevant. The noise impacts are from the individual sorties at the time of the activity.

The Air Force does acknowledge that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single training event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. And this may occur on 160 days of the year! The noise duration for these events is in no way comparable to that of commercial airliners. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities.

In Tables 3-5 and 3-6 the Air Force shows the SEL (sound exposure level) of four-aircraft formations to be 70.8 dBA and 72.3 dBA for the F-15E and F-15SG respectively. This is stated to be well below the 90 dBA SEL threshold for sleep interference. The needs of people with sleeping disorders and challenges need to be taken into account when considering noise levels that are found to be disruptive.

There will very likely be the occasional "fly boy" that launches their after burners at lower altitudes and/or breaks the sound barrier above the city. These bad apples will only add to the noise disruption that is expected. Even though it is not permitted, it still happens. I have been in the Owyhee and Steens Mountain areas where occasional fighter jets blow by at low altitudes and break the sound

barrier, startling visitors enjoying these remote areas and disturbing the fauna that have to live there. Can we expect this over Boise? How can this be assured these infractions won't happen? Why does this keep happening when it is not supposed to in sensitive wild areas? Who will enforce? This is not the "cost of freedom" it is a cost we should not have to live with.

Air Quality: Boise has significant air quality issues, particularly during the winter when inversions trap pollutants in the valley and during the summer when winds frequently bring smoke from wildfires into the region. We do not need additional pollutants that are unnecessary. This is becoming a significant health issue for many residents of the valley. The Air Force should be precluded from training exercises in the region during periods when the air quality is poor.

Furthermore, the EA states that there will be no net increase in greenhouse gas emissions as a result of their training range expansion because they are offset by reductions in emissions associated with current training exercises. However, this fails to account for increased travel distances for training which will result in the burning of more fuel and a net increase in emissions. Training locally and training in dispersed areas cannot be equated on a one-to-one basis.

Health and Safety: The Air Force's plan for safety is to not have any accidents. We all know that is an impossibility – accidents happen and flying complex military jets loaded with fuel over densely populated areas greatly increases the catastrophic impacts of an inevitable accident. If problems arise, pilots are allowed to jettison their fuel over 'unpopulated areas'. Is that the Boise Foothills, Bogus Basin or perhaps the desert south of town where people go to recreate? There is nowhere within the training circle around Boise that is not inhabited or used by local residents so where will they jettison their fuel if the unexpected happens and a pilot suddenly needs to lighten his/her load?

The EA describes the emergency services available from the impacted municipalities. Why is it their responsibility to deal with the mishaps from the Air Force? Does the Air Force intend to provide additional funding to communities for enhanced emergency services to deal with an Air Force caused disaster?

We now live with increased fire danger as we experience lengthened and more frequent droughts. An accident in our foothills would devastate the City population with a wildfire. The source of ignition from a down jet would be very difficult to extinguish with existing fire suppression devices designed for wildfires today. Will there be additional fire fighting resources made available to address this?

Similarly, the Air Force contends that the 'eye-safe' lasers used in their training operations won't cause any harm as long as it has been properly put into the 'training' mode as opposed to the 'combat' mode. Again, the finding of no significant impact is based on the assumption that an error will never occur. Are citizens expected to gamble their vision on the belief that the military never makes a mistake?

And finally, there is the simple fact that as Boise continues to grow the airport has also continued to expand operations and add commercial flights. The addition of Air Force training exercises will only exacerbate the problems of growth and increase the risk of a disaster resulting in the loss of life.

Environmental Justice: The EA does not evaluate issues of Environmental Justice, dismissing concerns from the outset based on their assertion that noise impacts averaged over a 24-hour period are negligible. However, they did not consider the affect of the noise and visual displays of fighter jets on people suffering from PTSD. This group includes not only veterans but also many of the refugees now

living in Boise who have come here to escape violence and war in their home countries. The adverse impact of Air Force activities on these vulnerable residents of our community need to be given serious consideration in an EIS.

Biological Resources: The EA is also dismissive of impacts to biological resources. While there are no direct disturbances on the ground, the assertion that there are no impacts to wildlife is erroneous. The impact of increased noise levels, particularly at night when it is otherwise relatively quiet, need to be more thoroughly examined. Potential disruption to the behavior of sensitive nocturnal species such as bats and owls should be considered in an EIS.

The EA also discounts impacts to migratory birds by claiming that since the overall number of air operations will remain the same, the impacts of Air Force training activities are also the same. This ridiculous assertion completely ignores the fact that the proposed activities will impact a different geographic area and therefore have the potential to disrupt other corridors for migratory birds. The Intermountain Bird Observatory located to the east of Boise (Lucky Peak) and within the training circle is an example of the types of areas adversely impacted by this proposal. A comprehensive analysis of migratory corridors within the expanded training area needs to be conducted.

In summary, the proposed training activities have the potential to significantly impact the local environment and quality of life, health and safety of the citizens of Boise. Before moving forward with the proposed actions, a thorough analysis of impacts and training alternatives must be conducted in an Environmental Impact Statement.

I urge you to conduct an Environmental Impact Statement.

Thank-you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "John Wheaton", with a stylized, flowing script.

John Wheaton

From: karen [REDACTED]
Sent: Sunday, October 14, 2018 12:07 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban CAS EA - Comments

Dear Ms. Shaver,

I understand the need for the military to train for missions and all possible scenarios that it may encounter. However, I am uncomfortable with your plan to train in my town and in my environment. I know that technology has many options for simulations, and my tax dollars have probably already paid for these types of programs. I know that this type of training is not the same as reality, but simulations these days are likely very realistic.

My primary concern is with the noise, which frightens me and causes stress. I am not a person who thinks big engines and Harley Davidson noises are cool. On the contrary, I am very sensitive to sound and loud things are very disturbing. This town is already getting much bigger and louder. It would be best if you don't exacerbate the problem.

Air quality is a big concern too. It is already terrible in the Treasure Valley area all winter and a good portion of summer with all the wildfires. Again, with the town growing so fast, perpetual smog is likely. And, again, It would be best if you don't exacerbate the problem.

Your EA seems dismiss quality of life concerns. I don't feel that you have put enough time into the quality of life issues for the residents of this area, and I don't feel like you are actually concerned about that. I don't want to live in a training range. Most people don't.

I want you to know that I appreciate the work you do and the services you provide to all of us. I support the military and understand that training is essential to performance in an emergency.

But, you have other options, and you should pursue them.

Thank you for your attention.

Karen Getusky

From: joanie fauci <joanie4c@yahoo.com>
Sent: Sunday, October 14, 2018 12:07 PM
To: joanie fauci [REDACTED]; SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Cc: City Council <citycouncil@cityofboise.org>; Mayor Bieter <mayor@cityofboise.org>; cbucknerwebb@senate.idaho.gov; merpelding@house.idaho.gov; mwintrow@house.idaho.gov
Subject: [Non-DoD Source] Re: MFHAFB URBAN CAS EA

Ms. Shaver,

Please accept my new comments on this issue as well as my previous comments below. I attended both the April 13 and the May 2 meetings at the library.

I am not in agreement with the determination of a Finding of No Significant Impact (FONSI). I believe the people of Idaho, and Boise in particular, deserve more, a full EIS review!

Any increase in military air flights over Boise IS a Significant Impact! We recreate outside. We dine outside. We converse outside. Boise tries to lure new, clean businesses to town. Who wants to come and have their conversations interrupted 160 times a day, 260 days a year (see numbers below, new numbers are somewhere between 160, 240, 400, and 624, it's very confusing)? None! So besides a quality of life issue, this is an economic issue.

If the planes fly high enough that we aren't going to hear them, why do they need to fly anywhere near our urban canyons/vertical developments? This can all be simulated, along with the applicable lighting. The lighting is probably better simulated electronically than actually so that all variations can be achieved. And for much cheaper. I don't think the simulations are given enough credit. This is the future of the military, simulated and electronic, not live people flying live planes. It would also prevent accidents (in the air and on the ground) and not worsen our already sketchy air quality. Simulated flying rather than actual flying is the true FONSI.

The "alternatives considered but dismissed" in the EA, section 2.5 gives me cause to wonder. Why is this needed for Mountain Home? Why can't the crews at the other bases do this? They are located near large urban areas. The Air Force does not need to be practicing these war games all over our country, with all types of aircraft. It takes me back to my other argument that these things need to be practiced in simulation, not over our citizens.

Items 1-5 below still stand.

1. When will these exercises end? If there are issues or problems, how does the public or city governments take action for a review or halt of the exercises?
2. During the April and May meetings it was clearly stated that only the US/Mountain Home crews would conduct these exercises. Now it appears that the Singapore crew (F15 SG) will also be involved. I'm not sure Boise, Idaho, or the rest of America is willing to sacrifice our cities for training of foreign militaries. I have nothing against Singapore but we have no guarantee that next year the F15 SG crew might be from somewhere else.
3. I am still highly suspicious of F35s coming to Boise. This EA and/or EIS should be clear that NO other plane besides a F15 can perform this activity.
4. At the spring meetings several people commented that the ground crews should be wearing obvious clothes and driving marked vehicles. I too believe this is a good idea. Since it's only an exercise it's not like they'd be tipping off the enemy. If instead they were obvious, people might not be concerned when they see the JTAC crew running down the street.
5. Where is the EA and/or EIS for JTACs? I hope what is mentioned in this document is not all we're expected to accept. At the spring meetings the Air Force personnel present didn't even know who the JTAC were. How can they be held accountable for anything? I'm afraid there will be vehicle accidents and they won't be held accountable. We need more information about this part of the project. I do appreciate the Air Force people who held the spring meetings and have prepared this EA. It's more than we've seen from the JTAC side of the project.

If the Air Force still wants to pursue this exercise, I request a full EIS with inclusion of the JTACs impact.

Sincerely,
Joanie Fauci

From: Christine Loucks <[REDACTED]>
Sent: Tuesday, October 16, 2018 11:32 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Air Force plan to conduct urban war games in Treasure Valley

To Whom It May Concern,

I do not support the conduction of urban war games in Boise, ID. I live within three miles of the Boise airport. When the Air Force or National Guard conduct training exercises in Boise, I am adversely affected by the noise. The early morning and late night training runs wake me up; when I'm walking in the neighborhood or on the Greenbelt, the noise from the flights destroys the peace and quiet of my walks.

I am also concerned about adverse effects on air quality in Boise. We already have increasingly bad air quality due to increased congestion and smoke from fires.

I support conducting an environmental analysis that considers all of the costs imposed on residents of the Treasure Valley before any decision is made regarding the plan to conduct urban war games in the Treasure Valley is feasible.

Sincerely,

Christine Loucks

From: Mike Stambulis [REDACTED]

Sent: Tuesday, October 16, 2018 9:21 AM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] Comments on Urban CAS EA

Please find my comments attached to this email.

Sincerely,

Michael Stambulis

[REDACTED]

October 16, 2018

Ms. Noelle Shaver
RE: Urban CAS EA
366 A6 7/A7IE
1030 Liberator
Mountain Home, Idaho 83648

Subject: Urban Close Air Support Environmental Assessment

I am completely against using Boise as a training ground for the urban “war on terror.”

I am against using the city of Boise – one of the fastest growing cities in the US as well as a refugee center – for training of not just US troops but of foreign troops. Foreign troops especially have no right to conduct their training missions in our city.

I am against forcing our civilian population to accept the presence of unidentified persons of unknown authority operating with unspecified liability and who appear to have no accountability for their behavior.

With that said, this Environmental Assessment (EA) fails to substantiate a finding of no significant impact (FONSI), and fails to provide adequate justification for not preparing a full Environmental Impact Statement.

Overall, this proposal does not adequately and objectively consider impacts to the citizens of the communities where the training is proposed.

Public Participation

There were serious shortcomings in the public participation leading up to the preparation of the EA. These shortcomings included the following:

- Lack of advanced notice
- Abrupt cancellation and rescheduling of meetings
- Lack of public meetings in all affected communities
- Lack of notification to everyone in the affected area

The last is especially critical. As one example, if a water company is going to propose something such as a rate increase, the company will typically publish a legal notice and notify all customers in writing via their monthly bill.

As this proposal will affect the largest population center of the State of Idaho along with many more Idahoans in surrounding areas mailings should have been sent to the entire affected population.

In addition, legal notices of public meetings should have been published in advance of the meetings. If legal notices were published, copies of those publications were not included within the EA.

Public Opposition

For the limited effort put into the public outreach, the response to the proposal was overwhelmingly negative. From the information provided in Appendix A, I counted over 30 comments opposing the proposal and only two in support. **However, the lack of public support was not mentioned anywhere within the body of the EA.**

Many of the comments in opposition directly spoke to the impacts on urban quality. As stated in Subsection 1502.16.g of Chapter V of Title 40 of the Code of Federal Regulations (40 CFR V), the discussion of environmental impacts of the alternatives must include a discussion of urban quality.

Lack of Alternatives

The EA does not adequately consider all reasonable alternatives. Subsections 1502.14 and 1502.16 of 40 CFR V clearly state the requirement to rigorously explore and **objectively** evaluate all reasonable alternatives, and subsequently provide a discussion that includes all the environmental impacts of the alternatives.

Alternatives that should be considered are included in the following list:

- Enhance the facilities at the Mountain Home Range Complex (MHRC) such as Saylor Creek
- Use video simulations
- Periodically fly and train at other military sites (note: this alternative was briefly discussed, but it was not rigorously and objectively explored)
- Enhance facilities on the Mountain Home Air Force Base
- Use a combination of the above alternatives

The environmental impacts, including urban quality and other socio-economic impacts, must be considered with the stated preferred alternative. As there are significant impacts from the

proposed action, these impacts must be weighed against not only the No Action Alternative, but all other reasonable alternatives.

Socioeconomics and Environmental Justice

The EA fails to account for the socioeconomic impacts regarding the livability of the nine urban centers as this will be the only area in the country where such training is conducted. It will economically affect land owner's property values and the livability and desirability of the Boise and the surrounding areas.

Boise is one of the fastest growing populations in the west. The Treasure Valley, and Boise in particular, show up on many Top 10 lists for desirable areas to live for a host of reasons. How will turning this valley into an urban military training ground affect those rankings?

Boise is a refugee relocation center – many of these refugees are relocated to Boise from war zones. The proposal fails to consider the negative impacts to refugees and veterans with post traumatic stress disorder (PTSD) as they encounter not only noise from the air sorties but potentially encounter unmarked ground troops acting as though we are in a war zone.

Comments Specific to the Sections of the Environmental Assessment

Abstract. If ground support personnel may be positioned on publically accessible paved roads such as driving along streets or parked along the side of a road, how can you guarantee that ground support would not interfere with civilian traffic or pedestrians?

Proposed Action. Adequate justification has not been provided for the proposed action. With the advancement of drones being used in these urban environments, I question the need to continue this training.

- How many missions of this type have been flown in recent years?
- Are the numbers of these missions increasing or decreasing?
- What is the legal basis for flying these types of missions in urban combat zones – there has not been a declaration of war to authorize these missions?

Section 1.3. "Ground support personnel are dressed and behave in a manner that is consistent with the civilian community to avoid drawing attention to operations. To facilitate aircrew tracking of identified targets, lead JTAC may be positioned in or on buildings in areas that provide broad line of sight. Remaining ground support personnel may be positioned anywhere

on the installation, such as in vehicles driving along streets or parked along the side of a road, walking along sidewalks, or walking into or out of buildings.”

Section 2.1.2 further indicates up to 15 personnel would simulate friendly forces and would include JTACs and up to 20 personnel would simulate non-friendly forces.

These activities have a high probability for encounters with civilians. What happens when there is a conflict between JTAC and civilians? There is no discussion of JTAC responsibilities and jurisdiction regarding encounters with civilians.

Section 1.5. “The Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirements.”

Not all reasonable alternatives have been considered. Given the paucity of Boise’s urban canyon, the alternative of enhancing training ranges already in existence must be included as an alternative, and the effects of this alternative must be compared side-by-side with the proposal and the no action alternative.

The presence or absence of a civilian population in the training area should not negatively affect the training as the purpose is stated as fully practicing the laser designation processes in varied urban settings. The purpose is stated as gaining a practical understanding of, and operational familiarity with, the environmental challenges that can disrupt the laser targeting efforts. These objectives can be met by enhancing the current training facilities. Enhancing the current training facilities would have significantly less impact on the socio-economic resources of Boise and its’ citizens.

Section 2.1.3. Will there be refueling touchdowns at Gowen Field? These impacts were not considered in the noise or air quality analysis.

Section 2.1.5. It is unrealistic to expect a group of up to five civilian vehicles for FFOR and five civilian vehicles for OPFOR would “...avoid drawing attention to themselves or the operations.”

Section 2.5. The alternatives do not consider enhancing the current facilities around the MHRC to simulate the large urban centers. The alternatives must compare all environmental impacts of reasonable alternatives. The citizens of the urban centers bear the brunt of the environmental impacts, and these are not considered in the socio-economic impacts.

Section 3.1. The noise analysis does not consider those citizens who work night shifts and will be subject to noise during the day; nor does it consider other sensitive populations.

Using a Department of Defense document as justification for establishing the noise level which will begin to interfere with sleep is not an independent source. Does the 90dBA SEL account for children, who have a higher awakening threshold than adults, and vulnerable populations such as shift workers whose sleep structure is under stress due to the adaptations of their circadian rhythm?

As one example, the World Health Organization (WHO), Europe, has published Night Noise Guidelines for Europe.

<http://www.euro.who.int/en/health-topics/environment-and-health/noise/publications/2009/night-noise-guidelines-for-europe>

The levels that may disturb sleep are much lower than the stated 90 A-weighted decibels Sound Exposure Level (dBA SEL). Page XVIII of the executive summary states, in part:

“If negative effects on sleep are to be avoided the equivalent sound pressure level should not exceed 30 dBA indoors for continuous noise. If the noise is not continuous, sleep disturbance correlates best with L_{Amax} and effects have been observed at 45 dB or less. This is particularly true if the background level is low. Noise events exceeding 45 dBA should therefore be limited if possible. For sensitive people an even lower limit would be preferred...

Important new studies (Passchier-Vermeer et al., 2002; Basner et al., 2004) have become available since then, together with new insights into normal and disturbed sleep. New information has made more precise assessment of exposure-effect relationship. **The thresholds are now known to be lower than L_{Amax} of 45 dB for a number of effects...**”

Page 9, Methods and Criteria, of the WHO document relates SEL to L_{Amax} :

$$SEL = 23.9 + 0.81 * L_{Amax}$$

Therefore, health effects may be seen at SELs of 60 dBA. This WHO document compiles data from multiple independent studies, and this data indicates multiple health effects may occur at levels substantially lower than presented in EA.

The potential sound levels were developed by a suite of computer programs. As this proposal is open-ended with no timeframe, there is no mechanism to review if these computer programs were accurate and there are indeed no impacts on affected populations. A sunset date for this proposal must be provided, and a mechanism outside of modeling to review its' impacts on the populations must be developed.

There is no accountability from the USAF to determine if the modeling was correct in assessing noise impacts. At the very least, a hotline to register noise complaints must be established. More robust measurement of actual noise impacts during training runs would be best.

Section 3.2. The Idaho Department of Environmental Quality was not consulted for the Air Quality section. Therefore, not all relevant agencies were consulted in this evaluation.

Summary

The document does not provide a summary of environmental consequences as required by Subsection 1502.16 of Chapter V of Title 40 of the Code of Federal Regulations. As such, important environmental consequences are not considered:

“Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned.” The proposed action is not congruent with the local government of the City of Boise and surrounding area and their desire to maintain livability.

“Urban quality, historic and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures.” The proposal does not take into account the degradation of urban quality to the residents of Boise.

The open-ended proposal only speculates on potential impacts and provides no manner to review and substantiate the assumptions that went into the FONSI.

The FONSI is not substantiated, not all alternatives were considered, and by federal law, an full Environmental Impact Study is required.

From: Ester Ceja [REDACTED]
Sent: Wednesday, October 17, 2018 7:34 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Cc: Ester Ceja [REDACTED]
Subject: [Non-DoD Source] Comments on Urban Close Air Support (CAS) Air and Ground Training Spaces EA

[↑ Next](#) [⚙ Last](#)

Thank for the opportunity to comment on the Environmental Assessment. This project is controversial and as a result should entail the development of an Environmental Impact Statement. The Environmental Assessment developed by the Air Force is inadequate.

1. NEPA Public Notification: As part of the NEPA process, the agency proposing the project must provide the public with an opportunity to review and comment on the proposal. From the beginning the Air Force failed to notify the general public through the proposed area about the project. Contact city officials and meeting with some county commissioners is inadequate and true public notification to the general public. Based on my review of the EA, the Air Force failed to conduct any meeting with the City of Burley where the project is being proposed, yet meetings were held in Eagle and Meridian where the project is not being proposed? It has become clear the Air Force lacks the skill and likely interest to notify the general public in all the communities where this project is being proposed. We have a growing population in the Boise, Twin Falls, and Burley areas where English is their second language. How did the Air Force reach out to these segment of the population? The Air Force must take the next step to fully and accurately evaluate this project by completing an EIS and conducting appropriate public notification efforts. I can not stress enough the inadequacy of the public notification efforts or lack there of specially outside of Boise. The Air Force should be looking into the different ways to notify the stakeholders. The stakeholder notification process thus far has been unacceptable especially for a project that impacts every single person who resides in the area in which the Air Force base wants to conduct their urban warfare exercises.
2. Alternatives Analysis: The alternatives analysis is inadequate. It appears as though the Air Force has already made a decision and they are just completing this process because it's required by NEPA. Go back to the drawing board and evaluate other reasonable alternatives.
3. Noise: The EA fails to fully address noise impacts to residents of the proposed project area. The EA does not consider noise impacts especially to residents suffering from Post Traumatic Stress, be it veterans or refugee families who have lived in war torn areas of the world. Further more, there is no cumulative impacts analysis of continued warplane noise.
4. Laser used by warplane: The EA mentions the ocular hazard of the IR laser but, fails to adequately identify what exactly is the ocular hazardous of an IR laser.
5. Section 106: The EA mentions prescriptive avoidance of buildings and facilities of cultural or historical importance. The EA fails to provide specific ways in which cultural and historical buildings will be avoided?
6. EPA Consultation Response: Lynne Hood with EPA provided comment on the proposal on March 7, 2018. It appears that the Air Force has ignored EPA's comments as the EA does not address them. Noise pollution: EPA recommended comprehensive analysis of potential impacts associated with the proposed activities in each location. The EA does not provide comprehensive analysis. Furthermore, the EA does not address EPA's comment on special consideration be given to sensitive receptors as well as environmental justice communities in each location.

Based on my review of the inadequate EA, I'm opposed to this project and REQUEST THAT AN ENVIRONMENTAL IMPACT STATEMENT BE DEVELOPED.

thank you,
Ester Ceja
Boise and Rupert resident

-----Original Message-----

From: jj max [REDACTED]
Sent: Wednesday, October 17, 2018 1:29 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban Close Air Support at Mt. Air Base, Idaho

Dear Ms. Shaver:

I am contacting you to protest the Urban Close Air Support at Mt Home air base in Idaho.

Please count my vote against such an unwarranted and misguided adventure. It is quite simply not anything we need and is therefore a monumental waste of time and resources.

I appreciate you taking note of this objection.

Sincerely,

James Max
Idaho Resident

-----Original Message-----

From: katie fite [<mailto:katie@wildlandsdefense.org>]

Sent: Wednesday, October 17, 2018 9:03 PM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>;

ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE <sheri.robertson@us.af.mil>

Subject: [Non-DoD Source] Please enter into Urban CAS War Game comments

Hello,

Please enter the following article on a recent F-15 plane crash during training into the record for the Urban CAS War Training EA.

At scoping meetings, the Air Force representative repeatedly said F-15s were very safe. Yet there have been many crashes, and the EA does appear to adequately detail these. a crash over a civilian population would be catastrophic.

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701

Air Force IDs American pilot killed in Ukrainian fighter jet crash

By Frank Miles

Published October 17, 2018

Fox News



Lt. Col. Seth "Jethro" Nehring, a fighter pilot with the California Air National Guard's 194th Fighter Squadron, part of the 144th Fighter Wing based in Fresno, Calif. was killed in a crash during a routine familiarization training.

The American pilot aboard a Ukrainian Air Force fighter jet killed when the aircraft crashed during a training exercise in Ukraine on Tuesday now has been identified as hailing from California, officials said.

An Air Force fighter pilot, Lt. Col. Seth "Jethro" Nehring, was with the California Air National Guard's 194th Fighter Squadron, part of the 144th Fighter Wing based in Fresno.

Nehring had been a member of the 144th for more than 20 years. He began his career as an enlisted crew chief before being selected for a pilot slot; he flew the F-16 Viper for more than 15 years and converted to the F-15 Eagle, the Air Force said.

"We are a close-knit family and when a tragedy like this occurs, every member of the 144th Fighter Wing feels it," Col. Daniel Kelly, commander of the 144th FW, said to Fox News in a statement. "We share in the sorrow felt by Jethro's loved ones and our thoughts and prayers go out to his family and friends as well as those of the Ukrainian aviator."

Officials said Nehring and a Ukrainian pilot were killed in the crash, which took place in the Khmelnytskyi region in western Ukraine, 175 miles southwest of the capital of Kiev.

The crash took place during joint military training between the U.S. military and Ukrainian counterparts, known as Clear Sky 2018, as Fox News previously reported.

The joint military training was billed as the "first-ever Clear Sky exercise," to be held primarily at Starokostiantyniv Air Base in Ukraine as well as other training areas and ranges in the region.

Personnel from nine nations are taking part in the exercises that started in Ukraine on Oct. 8.

The U.S. and Ukrainian governments are conducting an investigation to determine the cause of the crash, officials said.

From: Anne Olden <[REDACTED]>
Sent: Thursday, October 18, 2018 3:53 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Cc: Mayor@cityofboise.org; citycouncil@cityofboise.org
Subject: [Non-DoD Source] Urban warfare training

The idea of using our towns and cities for war games is beyond bizarre. Has this been done in other cities? Which ones and what was their experience? Why hasn't the public been made aware of this? Do we have a choice? It is not as though this will happen just one time. Build a mock city and conduct these events in empty territory.

Anne Olden
6101 N Portsmouth
Boise

-----Original Message-----

From: Megan Keating <[REDACTED]>
Sent: Thursday, October 18, 2018 10:37 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Huge Concerns about Urban War Games in Idaho

Good morning,

I'm writing to inform you I am very concerned about the proposed Urban War Games in Idaho. It appears there are very few details available to the public about what these war games entail. Do you have an Air Force website with additional details and information? I looked for information, but I could not find it, so if you do have a website can you please send it to me. I can tell you from what I have read and heard thus far, I do not want these war games to occur in Idaho.

Without knowing all the details, I can tell you I have huge concerns about the amount of noise the jets will make during the games and the stress and anxiety it will cause for many people. My son is very anxious whenever the jets fly over Boise and I can only imagine how the many veterans in Idaho suffering from PTSD feel about hearing the loud jet noises at unexpected times, especially in the middle of the night, while trying to cope with all they have been through.

I am also very concerned about the lasers that will be used, the images that are taken of civilians, how to know if an war game event is taking place when I'm walking downtown or if something needs to be reported to authorities.

Again, I have many concerns about these war games and with the little details I have, I do not want them happening in Boise. I grew up in Colorado Springs and I have had a great respect for the Air Force because of my proximity to the Air Force Academy growing up. However, based on what I have been hearing it sounds like the Air Force is planning to do whatever it wants regardless of the public reaction which is very upsetting to me and would definitely sour my respect for the Air Force. I hope that the Air Force is taking public concerns into strong consideration and will rethink the need for urban war games in Idaho.

Thank you for your consideration.

Megan Keating

From: Nicholas Emerson Moore <[REDACTED]>
Sent: Thursday, October 18, 2018 10:41 PM
To: 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>; SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Resident against War Games passing over my head

To whom it may concern:

I am appalled to hear about the proposal to approve the use of the skies and combat units above and within urban areas to simulate war tactics. I am opposed to this proposal. I feel that this will directly impact my safety. I am concerned that a situation wherein military craft and personnel are conducting raids and simulated warfare within urban areas with dense populations will create a hostile environment. I disagree with the findings of the Environmental Impact. I think there would be a huge impact, both to the physical and to the psychological well being of residents within urban centers chosen, if this measure were to be passed. I am not in support of this proposal and have faith that it will not be passed. If anything, please conduct further analysis and give the public a full year to assess this proposal. And, conduct further analysis regarding the full impact on the environment.

Concerned;

--
Nicholas Emerson Moore
weaving together stories
Spacetime. Growth. Dreams.

From: Michael Stuth Adams <[REDACTED]>
Sent: Thursday, October 18, 2018 10:31 AM
To: 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>; SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban Close Air Support Environmental Assessment

Good day,

I am against using Boise as a training ground for the urban close air support.

I am against using the city of Boise for training of not just US troops but of foreign troops. Foreign troops need to conduct their training missions in their own country and not in our city.

I am against forcing our civilian population to accept the presence of unidentified persons of unknown authority operating with unspecified liability and who appear to have no accountability for their behavior.

This Environmental Assessment (EA) fails to substantiate a finding of no significant impact (FONSI), and fails to provide adequate justification for not preparing a full Environmental Impact Statement. Overall, this proposal does not adequately and objectively consider impacts to the citizens of the communities where the training is proposed.
Public Participation There were serious shortcomings in the public participation leading up to the preparation of the EA. These shortcomings include lack of advance notice, meeting rescheduling, lack of meetings in all affected areas, and lack of notification to all people in those affected areas.

This proposal will affect the largest population center of the State of Idaho along with many more Idahoans in surrounding areas mailings should have been sent to the entire affected population.

Legal notices of public meetings should have been published in advance of the meetings. If legal notices were published, copies of those publications were not included within the environmental assessment.

The response to the proposal was overwhelmingly negative from the public and this was not acknowledged adequately in the environmental assessment. As stated in Subsection 1502.16.g of Chapter V of Title 40 of the Code of Federal Regulations (40 CFR V), the discussion of environmental impacts of the alternatives must include a discussion of urban quality.

The EA does not adequately consider all reasonable alternatives. Subsections 1502.14 and 1502.16 of 40 CFR V clearly state the requirement to rigorously explore and objectively evaluate all reasonable alternatives, and subsequently provide a discussion that includes all the environmental impacts of the alternatives.
Alternatives that should be considered are enhancing the facilities at the Mountain Home Range Complex (MHRC) such as Saylor Creek and use of video simulations.

The environmental impacts, including urban quality and other socio-economic impacts, must be considered with the stated preferred alternative. As there are significant impacts from the proposed action, these impacts must be weighed against not only the No Action Alternative, but all other reasonable alternatives.

The environmental assessment fails to account for the socioeconomic impacts regarding the livability of the nine urban centers as this will be the only area in the country where such training is conducted. It will economically affect land owner's property values and the livability and desirability of the Boise and the surrounding areas.
Boise is one of the fastest growing populations in the west. The Treasure Valley, and Boise in particular, show up on many Top 10 lists for desirable areas to live for a host of reasons. How will turning this valley into an urban military training ground affect those rankings?
Boise is a refugee relocation center – many of these refugees are relocated to Boise from war zones. The proposal fails to consider the negative impacts to refugees and veterans with post traumatic stress disorder (PTSD) as they encounter not only noise from the air sorties but potentially encounter unmarked ground troops acting as though we are in a war zone.
Comments Specific to the Sections of the Environmental Assessment
Abstract. If ground support personnel may be positioned on publically accessible paved roads such as driving along streets or parked along the side of a road, how can you guarantee that ground support would not interfere with civilian traffic or pedestrians?

These activities have a high probability for encounters with civilians. There is no discussion of JTAC responsibilities and jurisdiction regarding encounters with civilians and potential conflict between JTAC and those civilians.

Section 1.5. "The Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirements."

Section 3.1. The noise analysis does not consider those citizens who work night shifts and will be subject to noise during the day; nor does it consider other sensitive populations. Using a Department of Defense document as justification for establishing the noise level which will begin to interfere with sleep is not an independent source.

There is no accountability from the USAF to determine if the modeling was correct in assessing noise impacts. At the very least, a hotline to register noise complaints must be established. More robust measurement of actual noise impacts during training runs would be best.

Section 3.2. The Idaho Department of Environmental Quality was not consulted for the Air Quality section. Therefore, not all relevant agencies were consulted in this evaluation.

Summary

The document does not provide a summary of environmental consequences as required by Subsection 1502.16 of Chapter V of Title 40 of the Code of Federal Regulations. As such, important environmental consequences are not considered:

"Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned." The proposed action is not congruent with the local government of the City of Boise and surrounding area and their desire to maintain livability.

"Urban quality, historic and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures." The proposal does not take into account the degradation of urban quality to the residents of Boise.

I respectfully request that Boise and all of Ada County not be used for urban air close support training in any manner.

Kind Regards,
Michael Stuth Adams

From: Darcy Sharp <darcy_sharp@hotmail.com>

Sent: Thursday, [REDACTED]

To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

Subject: [Non-DoD Source] Urban CAS EA

Hello Ms. Shaver,

Please see my attached comments on the proposed Environmental Assessment Addressing Establishment of Urban Close Air Support Air and Ground Training Spaces in Urban Centers in Idaho.

Thank you for your attention to my comments.

Darcy Sharp

October 18, 2018

Ms. Noelle Shaver
RE: Urban CAS EA
366 A6 7/A7IE
1030 Liberator
Mountain Home, ID 83648
noelle.shaver@us.af.mil

Dear Ms. Shaver,

Due to potential air quality impacts, I am opposed to the Finding of No Significant Impact (FONSI) for the *Environmental Assessment addressing Establishment of Urban Close Air Support Air and Ground Training Spaces in Urban Centers in Idaho*. There has not been an adequate analysis of the air pollutant impact of the proposed air and ground training in urban centers. Treasure Valley is particularly impacted by onroad and nonroad mobile sources of pollution, which would be exacerbated by the proposed air and ground mobile support units.

According to the 2014 National Emissions Inventory published by the United States Environmental Protection Agency (EPA), Onroad Mobile Sources¹ for Ada, Canyon, and Elmore counties caused the following carbon-containing air pollutant load:

- 365,583,668 tons of Carbon Dioxide
- 227,221,646 tons of Carbon Monoxide

Nonroad Mobile Sources² for Ada, Canyon, and Elmore counties have emitted

- 14,940,805 tons of Carbon Dioxide
- 15,935,363 tons of Carbon Monoxide

There are also large loads of other criteria and toxic air pollutants. Carbon dioxide is the primary greenhouse gas emitted through human activities, accounting for 81.6% of all US greenhouse gas emissions³. Transportation accounts for 34% of total carbon dioxide emissions.

Treasure Valley has serious air quality issues. It gets so bad every year that sensitive populations have to move out of town. The Department of Environmental Quality Boise Regional Air Quality website⁴ documents efforts to address carbon monoxide, and PM10 with air quality improvement plans in an attempt to keep Treasure Valley from becoming a non-

¹ onroad_8910.csv file downloaded from <https://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-data> for onroad mobile sources.

² folder_2014neiv2_onroad_byregions folder; nonroad_8910.csv file downloaded from same website as footnote 1.

³ <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>

⁴ <https://www.deq.idaho.gov/regional-offices-issues/boise/air-quality-plans-reports/>

attainment zone for EPA national air quality standards. In addition, PM2.5 and ozone are pollutants of concern in the summer. This website states:

"Due to topography and weather patterns, the Treasure Valley is subject to some of the most severe wintertime inversions in the intermountain West. During an inversion, colder, heavier air settles into the valley while warm air sits above the inversion. This causes air stagnation as the cold air and accumulating air pollution is trapped. The pollution builds up under the inversion until a strong weather system moves through and mixes the air. During these events, air pollution monitors in the valley have recorded levels above the national health-based standard for both fine particulate matter (PM2.5) and coarse particulate matter (PM10).

The valley experiences air pollution problems in the summer months as well, as stagnant air conditions, heat, and intense sunlight combine to produce unhealthful accumulations of ozone pollution. Monitoring has shown increased levels of ozone in the valley, sometimes to unhealthful levels, during the past several summers."

Due to topography and weather patterns, the western half of the Treasure Valley acts as a geographic funnel for mobile source pollution from Canyon County to pollute Ada County. A report prepared by the Desert Research Institute, *Ozone and its Precursors in the Treasure Valley, Idaho*⁵ shows that ozone in the Treasure Valley is affected by regional fires, local air circulation, and local emissions. Whereas regional fires are episodic, the contribution of local emissions are constant and associated with regular activities such as motor vehicle traffic.

With these and other air pollution issues being a major concern in the Treasure Valley, I am strongly opposed to the redistribution or addition of additional onroad and nonroad mobile air pollutant sources. The Department of Defense has committed to reduce greenhouse gas emissions from non-combat activities 34 percent by 2020⁶. Are these training exercises considered non-combat? The draft EA has not provided any model scenarios for the Treasure Valley airshed or any other analysis that shows how the annual air emissions shown in Table 3-9 were calculated. There is no demonstration showing how the distribution of the proposed activities will impact air quality. Instead, a separate publication describes a proposal to increase the number of permanently station F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. The increased military aircraft activity will increase the pollutant load to Treasure Valley.

Thank you for your time and attention to my concerns.

Sincerely,

Darcy Sharp

⁵ https://www.deq.idaho.gov/media/352767-ozone_treasure_valley_report.pdf

⁶ EO 13693, *Planning for Federal Sustainability in the Next Decade*, referenced on page 3-10 of the Draft EA for Urban CAS Air and Ground Training Spaces, Mountain Home AFB.

From: Roy.Guerrero@deq.idaho.gov <Roy.Guerrero@deq.idaho.gov>
Sent: Friday, October 19, 2018 9:21 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] EA Comments

Hello Ms. Shaver,

Please see my attached comments on the proposed Environmental Assessment Addressing Establishment of Urban Close Air Support Air and Ground Training Spaces in Urban Centers in Idaho.

Thank you for your attention to my comments.

Roy Guerrero

Roy Guerrero

Boise, ID 83714

roy.guerrero@deq.idaho.gov

October 19, 2018

Ms. Noelle Shaver
RE: Urban CAS EA
366 A6 7/A7IE
1030 Liberator
Mountain Home, ID 83648
noelle.shaver@us.af.mil

Dear Ms. Shaver,

I am employed by the Idaho Department of Environmental Quality as a Security Supervisor. I receive approximately 75 calls per day from citizens regarding environmental health issues. When air quality is bad, this call rate increases to 250 calls per day or more. I frequently hear from sensitive populations such as school groups, athletic directors, seniors, and people with asthma and COPD who need to know if it is safe to exercise or even go outdoors. People who are looking to move into the Treasure Valley also call to ask questions about the air quality, and when they hear how frequently the Air Quality Index indicates hazardous levels, they look for other places to live.

Treasure Valley has serious air quality issues. It gets so bad every year that sensitive populations have to move out of town. With these and other air pollution issues being a major concern in the Treasure Valley, I am strongly opposed to the redistribution or addition of additional ~~onroad~~ and ~~nonroad~~ mobile air pollutant sources. The increased military aircraft activity will increase the pollutant load to Treasure Valley.

Due to potential air quality impacts, I am opposed to the Finding of No Significant Impact (FONSI) for the *Environmental Assessment addressing Establishment of Urban Close Air Support Air and Ground Training Spaces in Urban Centers in Idaho*. There has not been an adequate analysis of the air pollutant impact of the proposed air and ground training in urban centers.

Very Truly Yours,

Roy Guerrero



Fri 10/19/2018 12:16 PM

ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE <sheri.robertson@us.af.mil>

Urban CAS Training Draft EA

To ☐ Roy.Guerrero@deq.idaho.gov

Cc ☐ SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE; ☐ ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE

We removed extra line breaks from this message.

Mr. Guerrero,

Thank you for your comments. We will consider them with other received comments once the public comment period closes. All comments, and associated responses, will be included in the final document.

Respectfully,

Sheri Robertson
Branch Chief, Environmental
366 A6 7/A7IE
1100 Liberator Street
Mountain Home AFB ID 83648

DSN: 728-2299

Commercial: 208-828-2299

From: Sarah Stellberg <sstellberg@advocateswest.org>

Sent: Friday, October 19, 2018 2:59 PM

To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

Cc: Scott Lake <scott@westernwatersheds.org>; Kristin Ruether <kruether@westernwatersheds.org>; pam conley@q.com; Laird Lucas <llucas@advocateswest.org>

Subject: [Non-DoD Source] Comments on Urban CAS and Ground Training Spaces

Dear Ms. Shaver:

On behalf of Advocates for the West, Western Watersheds Project, and Boise Great Old Broads for Wilderness, I am writing to provide comments on the Air Force's Draft EA addressing the establishment of urban close air support (CAS) air and ground training spaces near Mountain Home Air Force Base. We appreciate the opportunity to participate in this process.

Kind regards,
Sarah

Sarah Stellberg
Staff Attorney
Advocates for the West
sstellberg@advocateswest.org
(208) 342-7024 x209



VIA E-MAIL

October 19, 2018

Noelle Shaver
EIAP/Cultural Resources Programs Manager
366 A6 7/A7IE
1030 Liberator St.
Mountain Home AFB 83648
noelle.shaver@us.af.mil

Re: Comments on Draft Environmental Assessment of the Establishment of Urban Close Air Support Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho

Dear Ms. Shaver:

On behalf of Advocates for the West, Western Watersheds Project, Boise Great Old Broads for Wilderness, and their staff, board, and members, I am writing to provide comments on the Air Force's Draft Environmental Assessment addressing the establishment of urban close air support (CAS) air and ground training spaces near Mountain Home Air Force Base. We appreciate the opportunity to participate in this process and request that you provide us with notice, sent to the undersigned counsel, regarding all further actions in this matter.

1. THE AIR FORCE MUST PREPARE AN EIS.

The Air Force's decision to prepare an EA for a project of this magnitude, in lieu of an EIS, violates NEPA and its implementing regulations. An EIS must be prepared by an agency for every "major Federal action significantly affecting the quality of the human environment." 42 U.S.C. § 4332(c). "Significance" requires consideration of both context and intensity. See 40 C.F.R. § 1508.27. "Context" considerations include the affected region, interests and locality, varying with the setting of the action, and include both short and long-term effects. *Id.* "Intensity" refers to the severity of impact, and the regulations list ten factors agencies must consider when reviewing intensity. *Id.*

The Ninth Circuit has held that the existence of any one of these "significance factors" may warrant preparation of an EIS. *Ocean Advocates v. U.S. Army Corps of Eng'rs*, 402 F.3d 846, 865 (9th Cir. 2005). Several of these "significance" factors are implicated by the Air Force's proposed action and require preparation of an EIS. These include:

- **The degree to which the effects on the quality of the human environment are likely to be highly controversial (40 C.F.R. § 1508.27(b)(4))**

A proposal is highly controversial when there is a "substantial dispute [about] the size, nature, or effect of the" action. *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1211 (9th Cir. 1998). These and many other comments provide abundant evidence of the uncertainties surrounding the impacts of military overflights to human health, air quality, imperiled species, and quality of life in urban centers. The level of controversy surrounding the impacts of this proposal is sufficient to trigger the need for an EIS.

- **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks (40 C.F.R. § 1508.27(b)(5))**

An EIS must also be prepared when an action's effects are "highly uncertain or involve unique or unknown risks." 40 C.F.R. § 1508.27(b)(5). As the Ninth Circuit has held, "[p]reparation of an EIS is mandated where uncertainty may be resolved by further collection of data, or where the collection of such data may prevent speculation on potential . . . effects." *Native Ecosystems Council v. U.S. Forest Serv.*, 428 F.3d 1233, 1240 (9th Cir. 2005) (internal citations omitted). There are several sources of uncertainty here. First, while it is clear that aircraft noise is a major cause of annoyance and disruption for communities, there remains much to be learned about the health impacts and effects of long-term exposure to aircraft noise on humans and wildlife. Moreover, there is substantial uncertainty about how the Singaporean Air Force can be held accountable to applicable federal, state, and local environmental regulations and standards for environmental quality. In the face of such uncertainty, especially given the magnitude and indefinite nature of the proposal, the Air Force must prepare an EIS.

- **The degree to which the proposed action affects public health or safety (40 C.F.R. § 1508.27(b)(2))**

An EIS is also required when an action's effects could cause significant impacts to public health and safety. 40 C.F.R. § 1508.27(b)(2). As explained below, the noise impacts of military overflights will risk serious public health impacts, including but not limited to the health effects of sleep disruptions. Additionally, these impacts will affect **over one third (35%) of the population of the State of Idaho.**¹ For a project of this magnitude, it is critical that an EIS be prepared.

- **Unique characteristics of the geographic area, such as proximity to ecologically critical areas (40 C.F.R. § 1508.27(b)(3))**

An EIS must be prepared where the proposed action will affect "[u]nique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas." 40 C.F.R. § 1508.27(b)(3). Here, the training operations will affect numerous state and federal wildlife conservation and refuge areas, such as the Minidoka National Wildlife Refuge and the Morley Nelson Snake River Birds of Prey National Conservation Area, which contain exceptional concentrations of raptors and songbirds during fall migration. The Intermountain Bird Observatory, located to the east of Boise and within the training circle, is another example of the unique areas adversely impacted by this proposal. While lacking special designations, there are many other areas within the selected training areas that contain exceptional shrub-steppe, mountain shrub, and mixed conifer habitats that are thought to be the primary feature looked for by migrating birds. Because these ecologically critical areas will be impacted by the proposed training operations, this factor is triggered.

¹ This figure was calculated by combining the 2017 census estimates for the following cities and towns which appear to be within the 15 NM radius: Boise, Meridian, Idaho Falls, Twin Falls, half of the city of Nampa, Eagle, Kuna, Mountain Home, Garden City, Jerome, Burley, Star, Rupert, Buhl, Kimberly, Heyburn, Filer, Wendell, Paul, Hansen, Glenns Ferry, Grand View, Eden, Declo, Bliss, and Albion. Census numbers are available at https://www2.census.gov/programs-surveys/popest/datasets/2010-2017/cities/totals/sub-est2017_16.csv.

2. THE EA FAILS TO TAKE A “HARD LOOK” AT DIRECT, INDIRECT, AND CUMULATIVE IMPACTS

a. Impacts to Wildlife

The Air Force failed to adequately analyze the potential impacts to wildlife. Studies have shown that aircraft noise may impact species of domestic and wild mammals and birds. The DEA concludes, *without any supporting evidence or analysis*, that “[n]oise levels associated with the Proposed Action would not be of sufficient magnitude to result in the direct loss of individuals or reduce reproductive output.” DEA at 3-2. An agency may not avoid preparing an EIS by making this type of conclusory assertion that an activity will have only an insignificant impact on the environment. *Ocean Advocates v. U.S. Army Corps of Eng’rs*, 402 F.3d 846, 864 (9th Cir.2005). If an agency opts not to prepare an EIS, it must put forth a “convincing statement of reasons” to explain why a project’s impacts are insignificant. *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir.1998). This “convincing statement of reasons” here must include the basis for the Air Force’s conclusion that the noise levels would not cause reproductive impacts on wildlife species. The Air Force must also look at the full range potential effects of these decibel levels on important species, such as bighorn sheep and sage grouse. For example, airplane noise has been shown to displace bighorn sheep and result in increased vigilance, coupled with increased energetic costs. Others showed that bighorn sheep penned in an area with semi-regular overflights and rigged to heart monitors experienced an increase in heart rate during helicopter flights. *See generally* Larkin, Ronald P., *Effects of Military Noise on Wildlife: A Literature Review*, available at http://nhsbig.inhs.uiuc.edu/bioacoustics/noise_and_wildlife.pdf.

Moreover, in the absence of definitive data on the effect of noise on animals, the U.S. National Research Council has proposed that protective noise criteria for animals be taken to be the same as for humans. We request that the Air Force follow this guidance.

The DEA also asserts that “[n]o additional effects on migratory birds would be expected because the overall number of air operations would remain the same, only distributed among the installation, MHRC, and the nine urban centers. . . . Additionally, continuing adherence to existing Bird/Wildlife Aircraft Strike Hazard (BASH) protocols would limit the potential adverse effects.” DEA at 3-2. This claim ignores the fact that migratory bird flight patterns may differ across urban centers and that a change in the location of air operations may indeed increase the potential impacts to migratory birds.

Finally, the DEA provides no details as to how it will ensure that aircrews avoid wildlife conservation and refuge areas, or how such avoidance will protect birds that migrate beyond the arbitrary boundaries of these wildlife areas. The DEA also fails to indicate whether or how the Republic of Singapore Air Force would be held to the BASH protocols or other wildlife protections laws applicable to federal agencies.

We request that the Air Force study the potential short- and long-term effects to domestic and wild animals from military overflights, including but not limited to federal- and state-listed species.

b. Impacts from Aircraft Noise

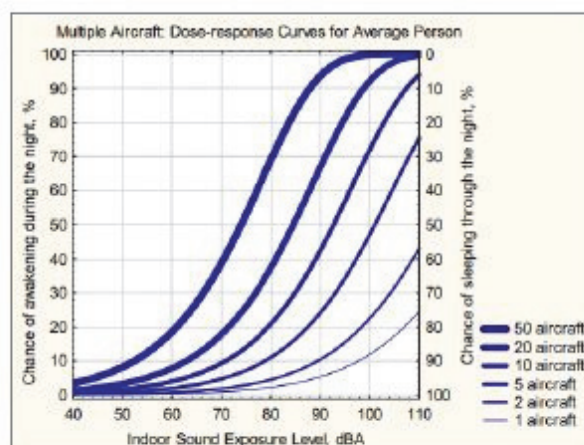
i. Sleep Interference

The DEA concludes that overflights would cause no sleep disturbance. *See* EA at 3-8. There are two key flaws with this conclusion. First, the DEA suggests that noise-induced awakening is the only form of potential sleep interference. The Air Force must consider how repeated nighttime overflights can otherwise impair sleep quality, through changes in sleep structure and delayed sleep onset.

Second, the DEA relies on a crude method for predicting the probability of noise-induced awakenings. It concludes that aircraft overflights would not awaken individuals because no single overflight would exceed the 90 dBA SEL threshold. The only support cited for this conclusion is a 2009 report which indicated that a single event at the 90 dBA level has only a 1% chance of awakening individuals. However, that 2009 report simply replicated the ANSI standard for sleep impacts at the 90 dBA SEL threshold and did not report the probability of awakenings at other decibel levels, including those at issue here.

Additionally, the relevant threshold here is not what percent will be awakened by a single event but what percent or number of people will be awakened by a full night of events. Exposure to multiple noise events substantially increases the likelihood of awakening at any given decibel level.

The best available science suggests that repeated overflights at the noise levels the Air Force predicts—up to 72 dBA SEL for four-aircraft formations—is likely to cause sleep awakenings. For the homeless population, who does not enjoy the assumed protection of 25dB from a building envelope, these impacts will be more severe. The figure below depicts just one study of the probabilities of awakenings at different sound levels and numbers of events. To meet the “hard look” standard, the Air Force must undertake a true noise impacts analysis based on the ANSI standard or similar models.



Source: Eagan, Mary Ellen, Using Supplemental Metrics to Communicate Aircraft Noise Effects (May 30, 2007), available at <https://www.noisequest.psu.edu/pdfs-documents/effects.pdf>.

ii. Other Health Impacts

The Air Force failed to meaningfully analyze the adverse health impacts of noise. Studies have shown that loud noise has a variety of physiological and psychological effects, including high blood pressure, peptic ulcers, and depressed immune response. In addition, sleep disturbance caused by nighttime noise exposure is associated with long-term adverse health outcomes. We request that the Air Force address these potential health impacts in its NEPA analysis.

iii. Learning Disturbance

Research suggests that aircraft noise can interfere with children’s learning in the following areas: reading, motivation, language and speech acquisition, and memory. The American National Standards Institute (ANSI) has developed a standard for classrooms that states that sound levels from intermittent sources, such as airplanes, during the noisiest hour should not exceed a one-hour average A-weighted steady background noise level (Leq) of 40 dBA. The criteria further states that the one-hour Leq should not be exceeded more than 10% of the noisiest hour. The airforce failed to use or disclose the noise impacts to schools using this generally accepted metric (Leq).

iv. Speech Interference

The Air Force failed to take a hard look at the potential for aircraft noise events to mask or drown out speech and other communication (telephone conversations, television viewing). The DEA concludes that there will be no disturbance of speech from the aircraft overflights, because “the threshold at which aircraft noise may begin to interfere with speech and communication is 75 dBA.”

This conclusion disregards the potential for outdoor speech disruption. There is general acceptance that a noise event exceeding 60 dBA has the potential to cause speech and communication disruption. Assuming an average 15 decibels of outdoor-to-indoor noise level reduction, the Air Force reasonably assumed that an outdoor noise event would have to exceed 75 dBA to cause speech and communication disruption. However, a noise event at the 60-75 dBA range would still interfere with outdoor speech, including person-to-person and cell-phone conversations. We request that the Air Force consider the true impacts to speech from their proposed activities.

v. Impacts to Quality of Life

Courts require federal agencies to discuss the effects of their actions on the quality of life for city residents. See *Hanley v. Mitchell*, 460 F.2d 240 (2d Cir. 1972); *Glass Packing Institute v. Regan*, 737 F.2d 1083 (D.C. Cir. 1984). Noise from individual F-15E and F-15SG overflights would generate distinct, yet distant, acoustical events that would be sufficient to interfere with a wide range of daily activities, including relaxation, recreation, and activities requiring concentration. Such intermittent noises would also interfere with performances at outdoor venues in the selected urban areas, such as Shakespeare Festival. The Air Force fails to consider these significant quality-of-life impacts. In fact, the air force appears to dismiss the potential for such impacts by claiming that overall noise levels would not be “incompatible” with current land uses. “Compatibility” with current land use is not an appropriate proxy for quality of life impacts.

Additionally, in measuring overall annoyance with the expected noise levels, the Air Force relies exclusively on the DNL metric. While commonly used in federal noise studies, the DNL metric is increasingly viewed as an inadequate measure of the actual effects of aviation noise. We encourage to Air Force to use more appropriate predictions of the quality-of-life impacts of aviation noise.

c. Air Quality and Pollution

Boise has air quality that is often in the moderate range but sometimes reaches hazardous levels, especially during winter inversions. Would CAS activities be halted during an inversion to prevent contributing to the buildup of smog?

Additionally, the unpopulated areas where fuel dumping might be permitted are used for recreation or wildlife protection. The Air Force must assess and disclose the health and environmental impacts of dumping fuel in case of an emergency.

d. Impacts to Natural Viewsheds and Soundscapes

The Air Force entirely failed to consider potential impacts to natural soundscapes and viewsheds within and around the selected urban centers. The City of Boise and other impacted urban centers include large swaths of public lands and foothills trails whose wilderness characteristics are highly valued. Visitors to these areas expect to be able to escape the sights and sounds of modern life, and the dull roar of F-15s passing overhead or their lingering contrails would impact their ability to enjoy these natural resources. Moreover, the reduced ability to seek quiet recreation in these areas may have impacts on tourism and property values within the impacted urban centers. We request that the Air Force consider how the overflights would impact the viewsheds, soundscapes, and visitor experience in natural areas.

a. Human Health Impacts

The DEA asserts that the lasers will have no human health impacts but acknowledges that the lasers can cause severe eye damage if viewed through lenses. Telephoto lenses are frequently used in photography during both the day and night, with astrophotographers frequently pointing their lenses at the sky or using telescopes. The chance of a laser hitting a lens may be low, but the risk of blinding someone is unacceptably high. The Air Force must adequately consider and disclose such impacts and consider ways to avoid these human health impacts.

There are also potential health risks to veterans and others who might hear ground teams communicating with planes and be reminded of their experiences. The Supreme Court has held that such psychological impacts are cognizable under NEPA and must be considered. See *Metropolitan Edison Co. v. People Against Nuclear Energy*, 460 U.S. 766, 771 (1983). What steps will be in place to ensure civilians will not mistake ground team action for a real threat?

3. THE EA FAILS TO CONSIDER A REASONABLE RANGE OF ALTERNATIVES

The Air Force failed to meet its obligation to analyze reasonable alternatives. NEPA requires agencies to analyze “reasonable alternatives to the proposed action and the ‘no action’ alternative in all EAs and EISs, as fully as the proposed action alternative.” 32 C.F.R. § 989.8. Reasonable alternatives are defined as those that “meet the underlying purpose and need for the proposed action and that would cause a reasonable person to inquire further before choosing a particular course of action.” These specifically include alternatives outside of the jurisdiction of the Air Force, reasonable alternatives raised during the scoping process, and combinations of the various alternatives.

The stated purpose of this proposal is to “ensure F-15E and F-15SG aircrews from the 366 FW can conduct Urban CAS proficiency training to identify, track, and perform in-air laser designation of targets within the full range of urban ground and airspace environments with ground support from JTACs.” DEA 1-6. Furthermore, “the Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirement.” *Id.*

In the DEA, USAF proposed only the preferred plan and the no action alternative as potential alternatives. A token effort was made at carrying other alternatives forward for analysis, but instead of true alternative plans, this was only a method determining which cities were best able to meet the needs of the project. The alternatives failed to offer difference in environmental impacts. All alternative cities were instantly dismissed as being too flawed to meet the selection standards. Two additional alternatives—training over all nearby cities and training at other AFBs or MOAs—were also summarily dismissed for failing to meet the purpose and need. None considered other ways of fulfilling the purpose and need.

Comments on the DOPAA raised at least two reasonable alternatives that were not addressed by the DEA. The first reasonable alternative is that USAF develop its own urban range in MHRC to make it a suitable substitute. This is briefly touched upon in the DEA as the likely outcome under the no action alternative, but the idea is dismissed for failing to meet the purpose and need. This is because it would require developing MHRC in a way that would require weapons employment training on gunnery ranges to be limited. However, there appears to be nothing in the purpose and need that is not met by having a private urban CAS range, and there is no mention in the purpose and need category of any requirement that the proposal not affect other training operations. If urban CAS is indeed a priority, altering the gunnery range might be a reasonable proposal deserving of some analysis. An examination of the proposal’s reasonability would require further analysis of the degree of impact it would have on the gunnery range and a further investigation of the effects it would have on training which the DEA neglected to perform.

The second reasonable alternative raised in the comments to the DOPAA is the possibility that all urban CAS training could be done in a simulator. (A-43). Nellis AFB in Nevada has a JTAC simulation facility that is described as “a most realistic training environment”. (<https://www.af.mil/News/Article-Display/Article/588267/bringing-heat-simulation-facility-keeps-jtacs-sharp/>). It allows ground teams and pilots to work together inside the simulator to perform a range of missions under many conditions and adequately meets the needs and purpose of this proposal. As required by the proposal’s purpose, this simulation can “ensure F-15E and F-15SG aircrews from the 366 FW can conduct Urban CAS proficiency training to identify, track, and perform in-air laser designation of targets within the full range of urban ground and airspace environments with ground support from JTACs.” DEA 1-6. Furthermore, a simulation could provide a superior range of urban and airspace environments to practice in because adverse weather conditions, enemy fire, and a whole range of other options could be simulated that would be too dangerous and unpredictable to practice live. This is not a remote or speculative option. JTAC simulation is used widely by the US Air Force, Navy, Marines, Air National Guard, and other armed forces

around the globe. <http://www.metavr.com/casestudies/jtac.html>. The technology is ready and able to substitute for putting civilian populations in any degree of risk.

Finally, the DEA should have considered a combined alternative which minimized flights over civilians by using simulations and/or improving the MHRC range to both minimize the potential risks to civilians and still allow live flights if they provide an irreproducible training atmosphere. Moreover, the proposal to train at other AFBs that was rejected due to a perceived lack of suitable urban environments should also be combined with other proposals. The proposal to build an urban CAS range on USAF land should analyze whether other AFBs have enough land available to build a large urban CAS range without impacting their gunnery ranges.

4. FAILURE TO ADEQUATELY NOTIFY AND INVOLVE THE PUBLIC AND STATE, COUNTY, AND LOCAL OFFICIALS.

Public participation and intergovernmental consultation are paramount to the NEPA process. One of the statute's goals is "insure that environmental information is available to public officials and citizens before decisions are made and actions are taken" and to "help public officials make decisions that are based on [an] understanding of environmental consequences, and take actions that protect, restore, and enhance the environment." 40 C.F.R. § 1500.1.

To that end, NEPA's implementing regulations require federal agencies to encourage and facilitate public involvement "to the fullest extent possible," 40 C.F.R. § 1500.2, and identify public scrutiny as an "essential" part of the NEPA process, *id.* § 1500.1(b). *See also id.* § 1501.4(b) (Agencies must "involve . . . the public, to the extent practicable"); *id.* § 1506.6 ("Agencies shall: . . . (a) Make diligent efforts to involve the public in preparing and implementing their NEPA procedures" and give "public notice of . . . the availability of environmental documents so as to inform those persons . . . who may be interested or affected," and "solicit appropriate information from the public.")).

Here, BLM failed to meaningfully notify and seek input from members of the impacted public. The public meetings were poorly advertised, scheduled at inconvenient times during work or commuting hours, and subject to last-minute cancellations which added to the public's confusion and frustration. Additionally, the Air Force has conducted virtually no public outreach. The notice in only two paper newspapers—especially in today's internet age—was grossly insufficient to alert the impacted public of the proposed project.

Additionally, the Air Force appears to have neglected its duty to meaningfully consult with state and local officials about its plans. The DEA indicates that the Air Force "notified relevant agencies, stakeholders, and federally recognized tribes about the Proposed Action and alternatives." DEA at 1-7. However, it appears that there were no face-to-face consultations, and that "notice" came in the form of a mere letter notifying select stakeholders of the project.

As a result, very few people seem to know about this project, including key members of Boise local government. We request that the Air Force: (1) direct mail information about the proposed project to all potentially affected households within the selected urban areas; (2) conduct additional public meetings; (3) submit Public Service Announcements (PSAs) for broadcast on local radio and television; and (4) meaningfully consult with state and local officials who may be unaware of the existence or potential impacts of this proposal. Such efforts would further the purposes of NEPA and help address the lack of meaningful public participation that is a main underlying cause of the growing public opposition to this proposal.

SUMMARY

In summary, the proposed training activities have the potential to significantly impact the local environment and quality of life, health, and safety of Idaho citizens. Before moving forward with the proposal, the Air Force must complete a thorough analysis of impacts and potential alternatives in an EIS, and it must do more to meaningfully notify and consult interested stakeholders.

Thank you for your time and consideration of our comment.

Respectfully submitted by



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Pam Conley
Communications Coordinator
Boise Great Old Broads for Wilderness

Scott Lake
Idaho Director
Western Watersheds Project

From: Suzanne Troje <[REDACTED]>
Sent: Friday, October 19, 2018 1:50 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Draft War Games (aka Urban Close Air Support) Environmental Assessment

Ms. Noelle Shaver

ELAP/Cultural Resources Programs Manager

366 A6 7/A7IE

1030 Liberator St.

Mountain Home, AFB 83648

via email: noelle.shaver@us.af.mil

Dear Ms. Shaver:

I am writing in response to the draft *Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training spaces near Mountain Home Air Force Base, Idaho* the availability of which I was notified by email on September 14, 2018. I do not believe sufficient investigation has been undertaken of the potential environmental impacts of the Proposed Action (training of F-15 pilots and other war personnel in and over population centers including Boise), even though the draft concludes a “Finding of No Significant Impact” and hence no need for a full environmental impact study. I urge the Air Force to re-consider the “No Action Alternative” or otherwise conduct a full environmental impact assessment.

The U.S. Air Force's plan is no small matter. It would establish a large-scale **permanent** urban combat training zone extending roughly 175 miles from Burley to Nampa. The zone will include numerous Idaho towns and cities located within a roughly 17-mile radius of the “center point” of each of nine designated “urban centers” including Boise, Twin Falls, Burley, Grand View, Glenns Ferry, Bruneau, Hammett, and Mountain Home. There are no plans for reviewing the merits of the training zone once established.

The alternatives considered, but dismissed, did not adequately compare areas similar in size to Southern Idaho. For instance, although Hill Air Force Base was considered, the Salt Lake City area which more closely resembles Boise was not considered. Similarly, although Nellis Air Force Base was considered, the Las Vegas metro area was not considered as a large urban area.

The plan involves U.S. and Singaporean pilots in F-15E and F-15SG aircraft respectively coordinating with teams of up to 35 troops on the ground. *Approximately one-third of the proposed operations will be conducted by Singaporean military pilots flying the F-15SG Singaporean combat aircraft.* The ground troops will be in civilian clothing and unmarked vehicles. The objective of the proposal is to simulate “the current mission realities of urban combat” by having personnel train in realistic locations with “urban canyons” created by multi-story buildings, artificial lighting to simulate day and evening combat missions, civilian traffic, and the general dynamic conditions of an urban area. It is ironic that “Boise” is considered an urban canyon – have you ever been to Singapore?

The Air Force has not done sufficient analysis on the air or noise quality impact on humans and on wildlife including migratory birds, and domestic animals. For example, the draft rather dismissively asserts, “Ground operations would result in negligible impacts on the noise environment. Vehicles would generate automobile noise during ground operations which would naturally blend with other existing noise sources in the urban centers. These impacts would be negligible.” The draft fails to consider that there are virtually no commercial flights out of the Boise Airport at night, and vehicle traffic is significantly less at certain times.

The draft cites an Executive Order, *Planning for Sustainability in the Next Decade*, which requires the Department to evaluate climate change risks and vulnerabilities, and to measure, report and reduce greenhouse gas emissions by a specific percentage. Yet the draft goes on to state, “This analysis does not attempt to measure the actual incremental impacts of GHG emissions from the Proposed Action, primarily because there is a general lack of consensus on how to measure such impacts.” This is unacceptable. No consideration is given to the growing population and development in Boise and the attendant environmental impacts this will have on the quality of our air, noise and life in general.

It was regrettable to hear of the recent death of an American pilot aboard a fighter jet during a training exercise in the Ukraine. This could happen in Boise and has not been considered in the analysis. I really hope that the Air Force will find a common sense alternative to using Boise and surrounding areas for its war game training.

Sincerely,

Suzanne Troje

From: Ann McClanahan [REDACTED]
Sent: Friday, October 19, 2018 4:32 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>; Mayor Bieter <mayor@cityofboise.org>; citycouncil@cityofboise.org
Subject: [Non-DoD Source] USAF proposal Urban Warfare Training - Boise ID

Dear Ms. Shaver:

This communication addresses my concerns of the proposed US Air Force's Urban Combat Training Zone and my opposition to its implementation in Boise and other southern areas of Idaho. These areas are not appropriate for this proposed training. Additionally, Idaho cities should not be used as combat training grounds for hire by foreign military forces.

My understanding is this proposal includes a permanent training zone and includes US and Singaporean pilots in F-15E and F-15SG aircraft and teams of up to 35 ground troops.

Please keep me informed of any development of this proposal.

Sincerely,

Ann S. McClanahan



October 19, 2018

Dear US Air Force Base Commander Kunkel, Ms. Nicole Shaver and Ms. Sheri Robertson,

Here are comments of WildLands Defense (WLD) on the Air Force's Draft EA and FONSI for: *Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, Responsible Agencies: U.S. Air Force (USAF); Air Combat Command; 366th Fighter Wing. Affected Location: Urban centers located near Mountain Home Air Force Base, Idaho.*

WLD carries forward all the concerns we have previously raised regarding this Urban War Combat proposal. It is an unlawful and unwarranted intrusion into American citizens lives. Every single citizen who would suffer overflights, be used as "chaos", have their selves, family, animals used in the Combat, be video-streamed, or who would potentially be subject to on the ground encounters with JTAC should be considered a Stakeholder. All these citizens who are Stakeholders should be mailed notification of the proposal by the military.

This Urban CAS Urban War Combat proposal is a shocking and unprecedented effort to impose hazardous and disturbing military War Game activity over top and in the midst of a civilian population of nearly a million Idaho residents. A new permanent ground and air War Range would be carved out, extending 175 miles East to West across southern Idaho.

Shifted Impacts

The Air Force intends to shift War training currently taking place at Military Withdrawn Range complex lands and in military Airspace at Saylor Creek Bombing Range and associated sites – to a huge and vulnerable civilian population. The Air Force has refused to consider alternatives in the EA. The AF states there is a reduction in flights (between Scoping and the EA) in response to the public. However, the information found in Tables, charts and text in the EA is quite confusing, and it appears the DOPAA may have used incorrect numbers on the amount of CAS activity taking place in Owyhee County. The EA includes "surges" where more frequent overflights may take place. The information on sorties, overflights, plane use, etc. presented in Tables and texts in the EA must be clarified and clearly explained in an EIS. It appears the AF EA calculations may seriously undercount the proposed number of sorties by at least a third and the number of expected aircraft to be flying sorties.

AF Response: JTAC activity was proportionately reduced with the reduced numbers of flight training operations to support 160 training events per year. The JTAC operational parameters would be as described in Sections 2.1 through 2.1.6 of the draft EA.

AF Response: JTAC activity was proportionately reduced with the reduced numbers of flight training operations to support 160 training events per year. The JTAC operational parameters would be as described in **Sections 2.1 through 2.1.6** of the draft EA

The Air Force seeks a permanent, immense new Urban War Range over Idaho's densest population. "*Once these air and ground spaces are identified and use is coordinated*", the USAF will shift the existing Urban CAS training operations from Military Withdrawn lands to the nine urban centers. This is an open-ended, i.e., permanent urban combat zone in Boise and other Idahoan cities, without any mechanism for review to assess how operations in the urban combat zone will affect our rapidly growing area over time.

AF Response: As explained in **Section 1.5**, the purpose and need for the Proposed Action is multifaceted, and includes: aircrew proficiency training, communication and coordination with ground support, gaining practical experience in identifying, tracking, and conducting in-air laser designation of identified targets. **Section 2.2** for the selection standards and analysis of reasonable alternatives for achieving the purpose and need of this required training. The 366 Fighter Wing (FW) Range Operations Office will monitor air operations for EA compliance. The information can be requested through the 366 FW Public Affairs Office (208-828-6800). The current proposed action is for the F-15E/F-15SG located at MHAFB. All proposed actions require MHAFB to follow the USAF Environmental Impact Analysis Process (EIAP). Coordination with local, state, and federal officials is guided by DODI 1322.28.

We are very concerned that the AF is not being transparent about a claimed "need" for this unprecedented militarization of civilian space and lives. Other military bases perform just fine without massive intrusion into civilian spaces. At the scoping meeting the AF claimed they needed "chaos". Now the EA references needing to make room at the existing military withdrawn lands for some other unexplained training use (what is this use???). The Air Force must provide solid data and information to back up its claims. Alternatives were suggested in Scoping of building more buildings on the existing ranges and at Mountain Home, and they have been cast aside.

Existing Urban War CAS training that has been taking place in and over the existing Military Withdrawn lands and existing MHAFB CAS sites has been ample for military readiness. See MHAFB 2016 Convoy Training EA Excerpts (Attached to Scoping Comments) describing use MHAFB existing Range Urban CAS training and fake towns at Saylor Creek and Juniper Butte, and WLD Scoping info submitted on other similar sites associated with other airbases.

The Air Force has not adequately responded to many public concerns raised in Scoping: Is this proposal, which assaults the health, well-being and property of a million Idaho civilians, an effort to clear out use at Saylor Creek and elsewhere, to make room for more U.S., Singapore or other foreign military training (either CAS or other types)? If so, more changes at the existing Ranges must be considered to nullify any "need" for Urban War training over and among Idaho citizens. Is this proposal to potentially make room for the F-35 War Planes the Idaho National Guard seeks to bed down at Gowen and the Boise Airport, and their foreseeable use of the remote Owyhee Ranges like Saylor Creek?

AF Response: As **Section 2.1.1** of the EA specifies the aircraft that would be used to conduct the proposed aircrew proficiency training. As stated in **Section 3.1.3** (page 3-9), clearly states that "if aircraft other than F-15E or F-15SG are flown during Urban CAS

Detailed analysis of these concerns must be provided in an EIS with a full range of alternatives, and a much more complete, accurate, scientifically supported baseline and clear analysis of the No Action alternative. This includes full and detailed analysis of how it is that the military has previously been proficient while relying on Urban Combat in fake towns, simulations, and combinations of these activities on military sites/Ranges.

Material displayed at the Boise F-35 scoping meeting showed that the military plans to replace F-15s with F-35s. Once the AF carves out its new Urban War Range, it is extremely likely F-35s will use it - if the Guard gets the F-35 War Planes it seeks. The Guard and politician efforts to acquire F-35s are highly controversial. Boise residents are alarmed at the loss of their homes (uninhabitable due to noise), plummeting home values, gutting of neighborhoods, health effects, and loss of quality of life associated with noxiously loud F-35 War Planes. Now this CAS proposal represents a further invasion of military activity into citizen lives. The EA does not adequately assess the noise, pollution, safety and other factors associated with foreseeable F-15 replacement by F-35s or other planes. It also does not address the highly foreseeable replacement of human pilots with automation. We also note there have been F-15 and F-35 crashes since we submitted Scoping comments.

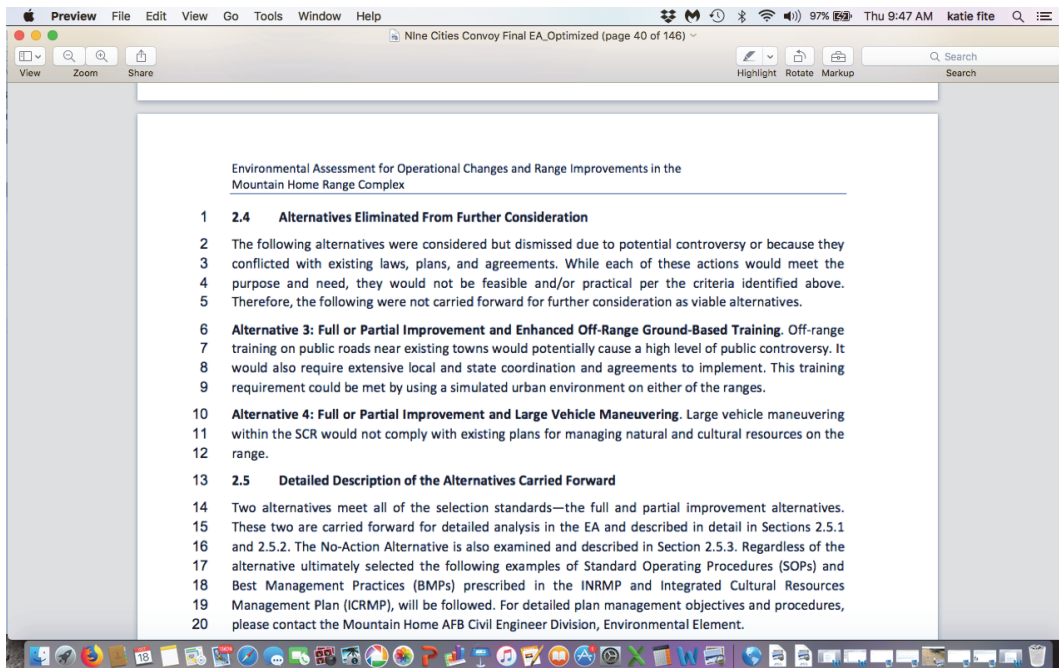
AF Response: Thank you for your comment. Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act to assess impacts that would result from implementing the proposed pilot proficiency training. Mountain Home AFB coordinated with regulators from the early planning stages, through public scoping, and through review of the EA to ensure awareness of the proposed training activities and the analysis approach. Because the proposed flight and ground operations would be limited in scope, and would be conducted as described in **Sections. 2.1 through 2.1.6**, impacts on certain resources either would not occur or would not have greater than negligible impacts. Therefore, those resources were reasonably and justifiably excluded from the full analysis (see **Section 3**, pages 3-1 and 3-2). A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an Environmental Impact Statement will not be required.

MHAFB has released this very significant and highly controversial CAS Urban War Game proposal at the same time that basing of F-35s is still unresolved. The Air Force has not yet released the F-35 DEIS. Plus there is significant public concern that even if Idaho is not “chosen” (with choosing a basing site being a highly political process) in the AF EIS process for F-35s now, Idaho may be added in later if additional \$\$\$ are available, under a Rider or other provision, and EIS “analysis” be used to claim F-35 basing has already been assessed.

Hazardous Military training activity, accidents, incessant noise and other disturbance, pollution, etc. will be shifted from the existing MHAFB Military Training Ranges to a new Training Range representing a radical expansion of the military footprint in Idaho and the region. This new Range would span a huge civilian population including Idaho’s largest city. It includes important public lands and various protected public land areas.

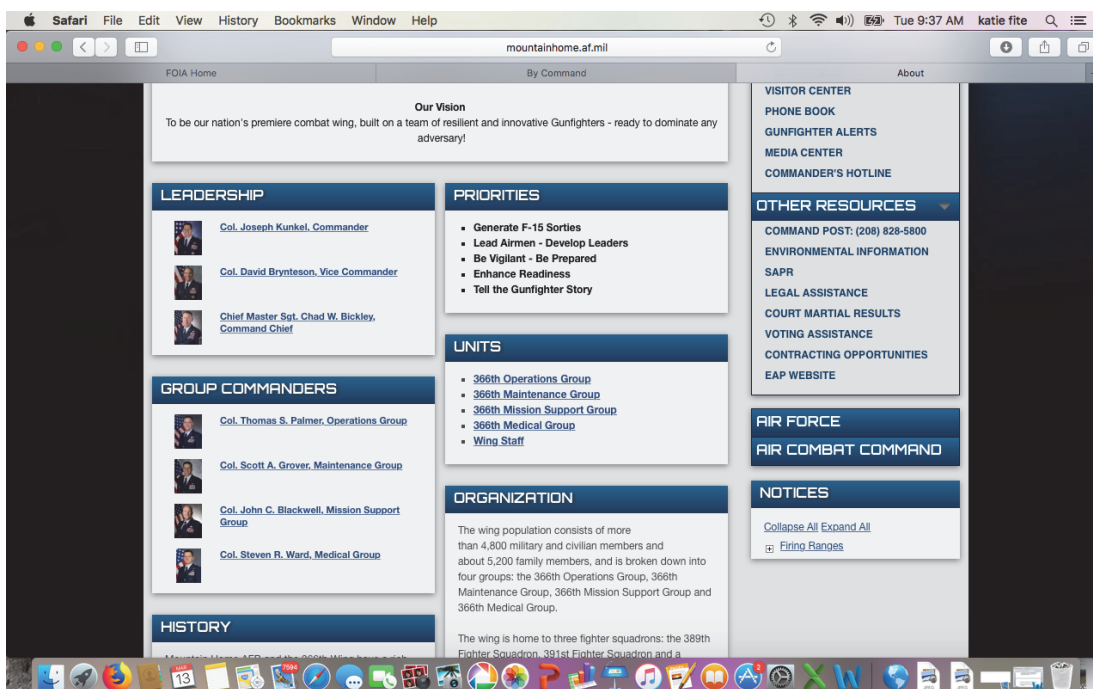
The EA does not address these concerns: Where in the Air Force did the Urban CAS proposal originate from? What larger Air Force plans may it be potentially linked to? Did it originate from MHAFB, the Air Force Secretary, or Department of Defense? We note that Sec of Defense James Mattis visited Mountain Home in January. This proposal was then mailed out to a few “Stakeholders” in February. Please also see Attached WLD letter documenting the USAF contemplating and rejecting without any analysis Boise (and Grandview and Mountain Home) Urban CAS training in an earlier Convoy Training EA that militarized State Highway 51.

See WLD Scoping letters re: the Urban CAS training taking place and facilities expanded from the 2016 MHAFB Convoy EA, “enhanced off-range training”. This EA specifically REJECTED Urban CAS training outside existing Military lands:



We are concerned the Urban War proposal may be “empire building” by the local airbase. Citizens and the public lands and wildlife underlying and within this radical range expansion may be subjected to Urban Combat activity in order to “generate” more MHAFFB F-15 sorties. See MHAFFB image below, showing “priority” for F-15 sorties. Military bases routinely compete with one another to get more facilities or activities – in order to get more federal dollars. More sorties = more dollars.

AF Response: As explained in **Section 1.5**, the purpose and need for the Proposed Action is multifaceted, and includes: aircrew proficiency training, communication and coordination with ground support, gaining practical experience in identifying, tracking, and conducting in-air laser designation of identified targets. **Section 2.2** for the selection standards and analysis of reasonable alternatives for achieving the purpose and need of this required training.



MHAFB web page showing “Priority” to generate more sorties.

Air Force Intends to Replace F-15 with F-35. So F-15 Planes and Activity Are Likely to Morph/Change after Air Force Gets New Urban War Range

The materials at the IDANG F-35 Scoping meeting in Boise showed that the Air Force intends to scrap F-15s and replace them with F-35s. The display states “**the F-35 is proposed to replace the aging F-15, F-16 and A-10**”. This has also been reported in *Aviation Week* and other news articles. It has also been reported that military pilots are to be replaced by automation in the near future.

AF Response: MHAFB will maintain F-15Es/SGs for the foreseeable future.

The EA’s proposal is for a perpetual Range. Thus, it is very likely and highly foreseeable that once the Air Force carves out an airspace and ground space for its new Urban War Range, the F-15s will be replaced by F-35s, and likely other military planes and devices as well. It is also highly likely the on the ground JTAC disguised military personnel activity and devices used will change.

AF Response: MHAFB will maintain F-15Es/SGs for the foreseeable future.

It is also very likely that Singapore and other foreign military aircraft (and potentially ground personnel???) will use the Urban War Range - with minor future NEPA tweaking by the Air Force. This raises the specter of even more foreign militaries using the bulk of Idaho’s population for “training” or using devices that may stream video, provide extremely detailed mapping, or otherwise collect data on Idaho citizens. This concern is not adequately addressed in the EA.

AF Response: Thank you for your comment. **Section 1.5** describes the purpose of and need for the Proposed Action. **Section 2.2** provides the selection standards used to identify the urban centers that could adequately support the proposed training.

EIS-level NEPA analysis must take a full candid hard look at all these highly foreseeable and linked activities and changes, and their cumulative effects. Both MHAFB and the Guard may be flying F-35s in the not so distant future.

AF Response: MHAFB will maintain F-15Es/SGs for the foreseeable future.

This need to thoroughly examine all of these concerns illustrates why it is essential for the Air Force to prepare an EIS.

AF Response: Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act to assess impacts that would result from implementing the proposed pilot proficiency training. Mountain Home AFB coordinated with regulators from the early planning stages, through public scoping, and through review of the EA to ensure awareness of the proposed training activities and the analysis approach. As reflected in the Environmental Consequences discussions provided in the EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an Environmental Impact Statement will not be required.

Recent reporting highlights the military practice of incrementally putting in place much larger or different activities than the public was informed of in an initial proposal. See

<http://www.truth-out.org/news/item/43596-the-pentagon-is-using-an-environmental-law-meant-to-protect-us-against-us>

“Using the NEPA process, the US military is required to evaluate the environmental and related social and economic effects of their proposed actions. The military is also required by NEPA to provide opportunities for public review and comment on those evaluations.

But critics say the military has stacked the deck in its own favor in order to get what it wants, oftentimes even doing so illegally.

Karen Sullivan, a retired endangered species biologist, cofounded the West Coast Action Alliance, which acts as a watchdog of naval activities in the Pacific Northwest.

Sullivan has compiled a document that she believes to be akin to a DOD "NEPA Playbook," which she shared with Truthout.

*The pattern Sullivan sees the DOD use to insure its operations or trainings are never held up or denied by NEPA begins with **the military always finding, in its environmental assessments, that its activities will have "no significant impact" on the environment or civilians**.*

“Sullivan pointed out that if impacts from the military's activities are likely to be significant for a particular project, the military segments that project into multiple pieces, so that several EAs (rather than one comprehensive EIS) can be prepared. This strategy allows it to portray the impacts described in each EA as below the threshold of significance. This is illegal. It is called "impermissible segmentation" under NEPA (40 CFR 1500-1508), which prohibits the breaking up of a larger project into smaller components that separately might have negligible impacts, but would, if considered together, likely be significant. It's illegal for an agency to do this”.

It has also been rumored that the military may seek to become exempt from NEPA – thus any assurances of future analysis or public process made in the EA would not be valid.

AF Response: MHAFB will comply with the AF EIAP until directed otherwise.

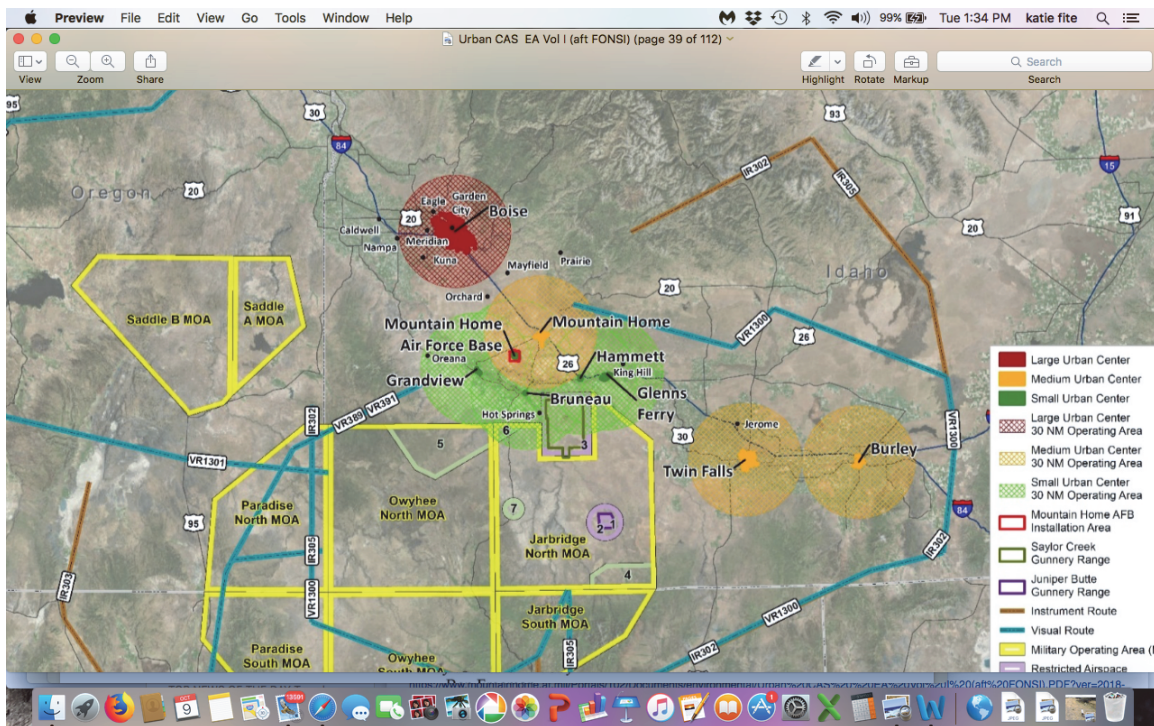
As we describe below, and in our Scoping letter regarding the 2016 MHAFB Convoy Training EA and references made in the DOPAA, it appears that segmentation and piece-mealing of a larger Urban War Plan has already been taking place with tax dollars used to build more new CAS facilities on the MHAFB Range. Urban War CAS over towns was rejected for analysis in the Convoy document because of the controversy. What has changed, and spawned the proposed DOPAA/EA actions in MHAFB's latest segmented and piece-meal Urban Range and activity expansion move? The Air Force prepared one of its many segmented incremental EAs for the MHAFB Range Complex that include militarizing a State Highway and two major access roads across public lands. That EA authorized Highway 51 and Bruneau Desert road closures for military “convoy training”, and allowed scrambling GPS frequencies - along with building more buildings on the existing Range, more use of white phosphorus, landing pads for other types of aircraft, increased use of unspecified and unknown “illumination devices”, etc. There was no media coverage, and no public outreach or public meetings on this MHAFB proposal of which we are aware. That EA expanded military activity within military Withdrawn and existing Range lands, across public land rights of way, and onto a significant State Highway. Since the Air Force has no convoys, it is unclear who all would be using this.

AF Response: The Environmental Assessment for Operational Changes and Range Improvements in the Mountain Home Range Complex, 17 Jul 2017 was conducted per AF EIAP

The Urban Combat CAS proposal must also be seen and assessed as part of the cumulative effects of an ever-expanding military footprint across Idaho and the region associated with MHAFB. In fact, this map image from the EA shows how the proposed War Game Range is contiguous with – and overlaps – the northern part of the immense MHAFB airspace over vast areas of public lands. It would in reality become one immense range. A

CAS wheel even overlays most of Saylor Creek. Bizarrely, the mapping does not show Saylor Creek as part of the existing Range, but instead as part of the proposed Urban War Range. See:

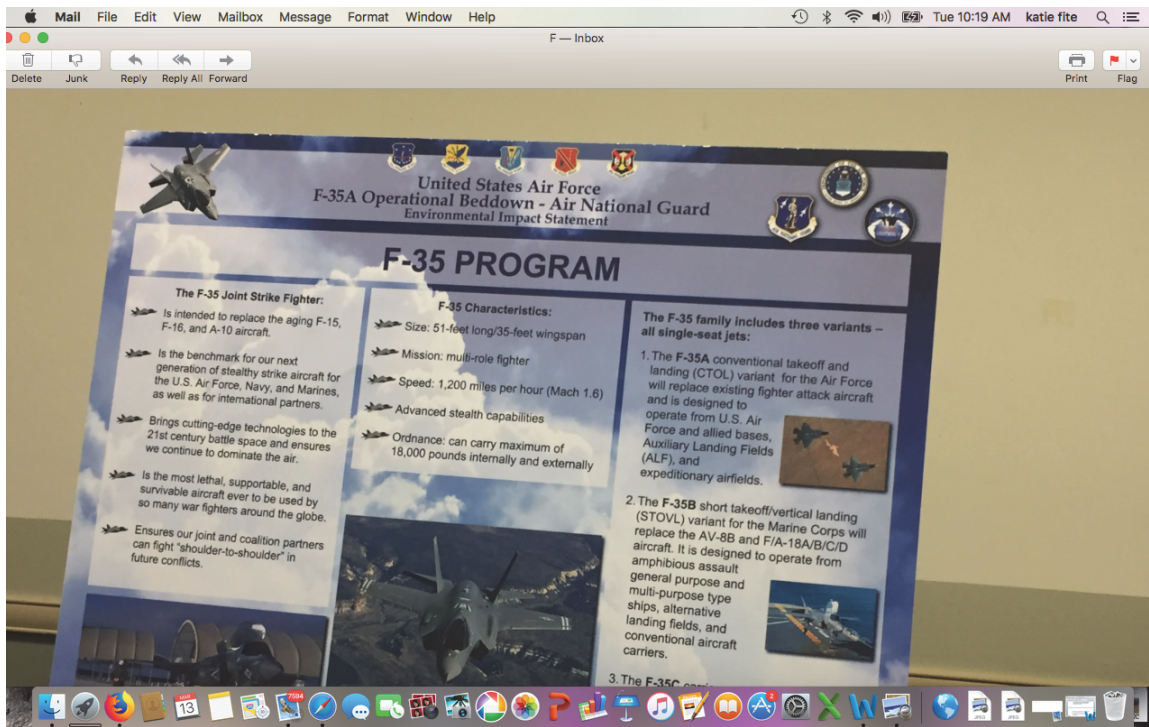
AF Response: SCR is restricted airspace defined separately from the MHAFB Military operations area (MOA).



The Urban War Range must be considered in light of a foreseeable F-35 beddown using the Boise airport, and/or MHAFB F-15s being replaced with F-35s, plus transient and other foreseeable plane use of airspace over Boise. The full battery of current and proposed MHAFB activities must be assessed in an integrated hard look NEPA analysis in an EIS here. The increasing number of transient military planes overflying Boise and using the Boise airport are a big noise and safety concern. The AF EA noise calculations need to be seriously analyzed by independent experts. The Military's artifices averaging sound over extended periods of time and claiming minimal effects are meaningless to a person, wild animal, or domestic animal exposed to the sound.

AF Response: Mountain Home AFB will maintain F-15Es/SGs into the foreseeable future. Additionally, noise is modeled using NOISEMAP, a suite of computer programs and components to predict noise exposure due to aircraft operations. Air Force Instruction (AFI) 32-7063, Air Installations Compatible Use Zones Program, provide land use guidelines for noise exposure. Operational parameters used in the analysis conservatively assumed all operations would occur at each urban center. Additionally, the analysis used thresholds more conservative than the American National Standard Institute for determining impacts on noise sensitive receptors. The impacts from the proposed flight training operations would be less than significant.

The Air Force must use this radical Urban War Range proposal process to take that hard, integrated look in an EIS with wide-ranging public notification and involvement.



Poster displayed at 2018 IDANG F-35 Scoping Meeting in Boise stating F-15s are to be replaced by F-35s.

No Public Meetings on Draft EA

The Air Force has not held public meetings on the release of the Draft EA, despite a request for such meetings.

The Air Force has also not fulfilled citizen requests for a meeting with the MHAFB Commander Kunkel who is new to the base (2017) to discuss concerns about this harmful unprecedented proposal. This was raised at a Scoping meeting, e-mail inquiries were made by the public, and no action has been taken by the AF.

AF Response: Stakeholder communications and notice of the public scoping meetings was carried out in accordance with NEPA, 40 CFR 1506.6, *Public Involvement*. Public involvement, including scoping and outreach efforts, are described in **Section 1.7** of the Draft EA. Scoping comments were requested through mailings sent to vested stakeholders identified early in the project planning phase - including local, state, and federal governments, planning entities, tribes, and non-government organizations. Additionally, MHAFB publicly announced and conducted eight public meetings across the defined project area with a town hall format that to enable community members who were in attendance to raise concerns and engage in discussion about the proposed training. The wing commander designated military members to represent the installation. Mountain Home AFB accepted and considered public scoping comments in the development of the DOPAA for several months (instead of the typical 30-days), which defined the Proposed Action.

Immense Civilian Population and Public Lands and Resources Impacted

The EA does not adequately address these concerns: What is the current human population underneath the 30 nautical mile diameter circles around the Nine Urban areas, and the flight paths the planes will take between them and commuting to MHAFB? Please provide much clearer and detailed mapping of flight paths. The EA contains more information about flights, but it is very confusing, and does not really show how the CAS use will take place. This activity will take place outside existing MTRs, won't it? Full analysis of the current areas and heights and other controls on military overflights across the project Footprint must be clearly laid out So must FAA oversight. This is necessary to understand the complete impact to populations and public lands resources.

AF Response: The airspace over Boise is a part of the National Airspace System (NAS) (controlled by the Federal Aviation Administration). The NAS is available to all aircraft to include the Department of Defense (DoD). Military aircraft, including those from MHAFB, routinely fly within the NAS, and perform the same instrument procedures as commercial, corporate, and general aviation. As a standard practice, the flight plan is filed with the FAA prior to take-off. Pilots would coordinate with air traffic control in accordance with existing flight safety rules. Standard airspace deconfliction practices through pilot communication with air traffic control would be followed. Adjustments to local flight patterns are monitored by Air Traffic Control (ATC) radar and aircraft transponders. If the Proposed Action moves forward, the 366FW/A3TS will establish letters of agreement with the FAA/ATC for all IFR flights scheduled and operated under this proposal. Any VFR Flights under this proposal will be conducted in accordance with both Federal Aviation Regulations and Air Force Instructions.

What is the population of the affected overflight and ground use area projected to be in 2028? In 2038? This proposal will impact the lives, health, and well-being of half or more of Idaho citizens. Idaho is the fastest growing state in the Nation, and much of that growth is taking place right within the area targeted for this massive new military Range. Many new as yet undeveloped subdivisions have also been platted, affecting the dispersion of the population in the lands targeted by the proposal. Thousands of new homes are platted - including in areas south, east and west of the Boise Airport that would be overflown under the War Game Proposal (and potentially subjected to hellish F-35 noise as well).

<http://abcnews.go.com/US/idaho-fastest-growing-state-population-us-census-bureau/story?id=51903202>

Re: Treasure Valley.

<http://www.idahostatesman.com/news/local/article190738949.html>

“The news may come as no surprise to those of us in the Treasure Valley. Earlier this year, [Meridian was named the nation’s 13th fastest-growing city](#), and [Ada and Canyon counties accounted for 50 percent of the state’s population growth in 2016](#).

[Idaho officials estimate that our state could swell to 2 million residents by 2025.”.](#)

Much of the still rural land areas underlying the War Game zone and surroundings are expected to become even more densely populated in the near future. Thus, even more residents and their children and animals will become adversely impacted by this immense and unprecedented Military War training airspace and land activity grab.

AF Response: Sections 2.1 through 2.2.6 describe the operational activities that would be conducted under the Proposed Action. Please see Section 4.2 for discussion regarding the potential cumulative effects analysis.

Necessary Baseline Data and Analysis on Public Lands, Recreation and Wildlife Impacts Are Not Provided in EA

The project entails: “Aircraft would be flown at an altitude of 10,000 to 18,000 feet above ground level within a 30-nautical mile operating area for each urban center. Ground teams would support flight tracking within the ground area directly underlying the operational airspace using radio communication equipment. Realistic Urban CAS training requires that all members of each ground support team behave in a manner typical of any community member to avoid drawing attention to themselves or the operations. Thus, ground support personnel would be unarmed and dressed in plain clothes. Members of each ground support team would be inside civilian vehicles driving along paved streets and paved roadways during training operations”.

While the ground people may be on paved roadways (for now), the airplanes will be growling overhead – and the full spectrum of frequency noise levels of the planes are not provided (including foreseeable F-35s or others that may use the Range in the future). As far as paved roads, JTAC activity has the potential to impact many areas of public lands and recreational use areas in town and close to towns. For example the road to Bogus Basin is paved, approx. 12 or so miles of the lower Mud Flat road is paved, various roads near the Snake River Canyon are paved, Highway 51 is paved, Highway 78 is paved, Simco road across the SRBOPA is paved, etc. Once the Air Force gets either Air or Ground space, it proceeds to expand activities. Example: 2016 MHAFFB Convoy training EA.

AF Response: Section 1.3, pages 1-3 and 1-4 of the Draft EA defines the existing proficiency training in Urban CAS on MHAFFB. Section 2.1.4, page 2-2 of the document defines the ground support activities associated proposed action. Ground support teams will only operate along paved public roads, will abide by standard traffic safety regulations and behave in a manner typical of the average citizen, and will not enter any buildings. Mountain Home AFB will maintain F-15Es/SGs for the foreseeable future.

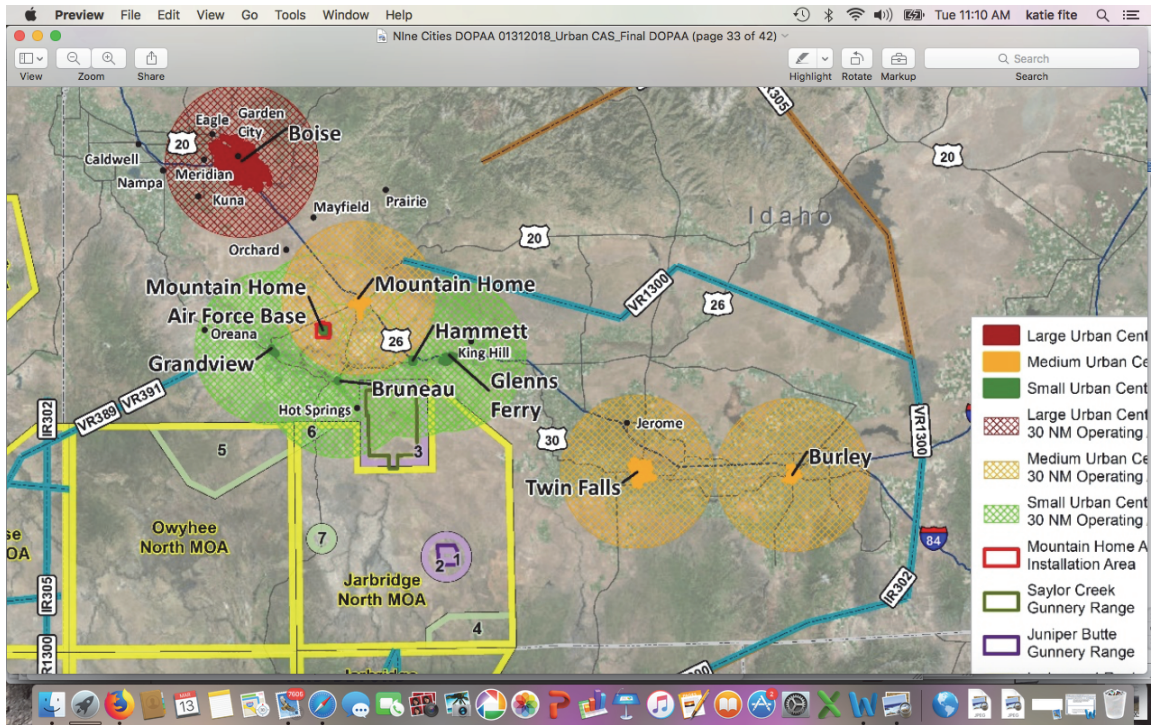
There are paved roads all around and running through the Snake River Birds of Prey Area. The SRBOPA area already suffers a great military burden from IDANG OTA training. The Guard has been the cause of many fires that destroyed significant habitat in that area over the years.

AF Response: Section 1.3, pages 1-3 and 1-4 of the Draft EA defines the existing proficiency training in Urban CAS on MHAFFB. Section 2.1.4, page 2-2 of the document defines the ground support activities associated proposed action. Ground support teams will only operate along paved public roads, will abide by standard traffic safety regulations and behave in a manner typical of the average citizen, and will not enter any buildings. Mountain Home AFB will maintain F-15Es/SGs for the foreseeable future.

Residents of Urban populations like Boise frequently recreate in public recreational areas close to and within town –ranging from the Foothills to city Parks. The overflying military aircraft noise and potential for training accidents, including inadvertent mis-use of technological devices on planes or on the ground, will be imposed on people not only in and surrounding their homes, but also while they are outside in public open spaces recreating, seeking peace and quiet, attempting to photograph or view wildlife, or engaged in other pursuits. How many parks are under the overflight areas (15 NM CAS circles and throughout the circle as well as flight paths), and which specific areas will be avoided vs. used in War Combat exercises? Residents of Idaho urban areas will be unable to escape the incessant disturbance of these War Games – and will be exposed to noise, pollution, potential catastrophic accidents or mis-use of devices in their homes, at work, and while trying to relax or recreate.

AF Response: Please see Section 4.2 for discussion regarding the potential cumulative effects analysis. Also, Chapter 3 Affected Environment and Environmental Consequences, and F-15E/F-15SG are flown by a pilot and a weapons system office (WSO). There is a division of duty in the cockpit. The pilot flies the aircraft; the WSO operates the laser. Crew coordination is required to use the laser system in the appropriate manner. The division of duty ensures a check and balance during operation.

Public lands in Owyhee County have already been turned into a noise Hell Zone and the skies whitened with contrails in many places due to incessant military plane noise. Now this proposal seeks to extend the MHAFFB military noise and other disturbance footprint even further onto public lands (in Ada County, Twin Falls County, Cassia County not yet militarized portions of Owyhee County, etc.). The Air Force seeks to carve out the equivalent of a new military Range in some of the only areas that do not have MHAFFB USAF airspace over them. As the MAP of the proposal (when compared with a BLM land status maps and USFS maps) shows -- this military activity would extend onto Boise National Forest lands, and southern Sawtooth Forest sage-grouse habitat lands - those near Albion - plus 15 NM extends onto the Minidoka Ranger District lands south of Twin Falls.



Note immense land area under this proposed new Range. The colors obscure the coloring of public lands areas underneath. How large is the land area, and what is the land ownership/status? Much better and more detailed mapping must be provided.

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources.

Appendix A, page **A-1** lists the stakeholders and agencies with, which, MHAFB coordinated throughout the NEPA effort for this Proposed Action. All listed were provided access to the DOPAA during early planning and scoping, and the Draft EA/Draft FONSI during the public comment. Noise is modeled using NOISEMAP, a suite of computer programs and components to predict noise exposure due to aircraft operations. Air Force Instruction (AFI) 32-7063, Air Installations Compatible Use Zones Program, provide land use guidelines for noise exposure. Operational parameters used in the analysis conservatively assumed all operations would occur at each urban center. Additionally, the analysis used thresholds more conservative than the American National Standard Institute for determining impacts on noise sensitive receptors. The impacts from the proposed flight training operations would be less than significant.



The map above is a very rough overlay of the CAS circles on a map showing public lands. Tan is BLM, and yellow is USFS managed public lands. This also shows how some smaller cities may face incessant, multiple and overlapping disturbance from being under multiple City CAS 15 NM zones, as they are located under “wheels”.

This also shows how disingenuous the EA is in focusing on only the Nine Cities claimed to be impacted by the proposal. The 15 NM mile radius overlays Burley, Rupert, Paul, Declo, Heyburn, Albion, Hansen, Kimberly, Twin Falls, Filer, Eden, Wendell, Gooding, Hagerman, Bliss, Mountain Home, maybe Buhl, King Hill, Garden City, Eagle, Kuna, and part of Meridian – plus recreational lands in and surrounding these sites. Yet impacts on cities outside the nine highlighted in the EA are not examined.

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3), the proposed training would not result in significant impacts on resources.

Is There a Link to National Guard OTA and Surroundings Activities, or Potential State of Idaho Land Actions?

The EA does not adequately address this concern: There have been recent efforts to expand the Idaho Guard’s ground-based activities in Idaho. The BLM scoped a proposal to grant Rights of Way to the state for access to state land it would lease to the Guard for expanded activity. It was inexplicably withdrawn, and re-surfaced earlier in 2018. Feeble reasons were given as to need – with the Guard oddly claiming ground squirrel shooters in the SRBOPA were crimping their training. The Guard also admitted it had torn up existing lands used for training so badly that they needed to be rehabbed. There are also rumors of a potential state land trade of some kind in the SRBOPA. See WLD comments on BLM ROWS for IDANG, and documents showing IDANG expects to bring in large numbers of military units, who pay for use of Idaho land.

Do any Guard activities at Orchard or elsewhere interface with USAF or IDANG training activities in any way? If so, where and how? Are there foreseeable changes – as large portions of the SRBOPA and OTA underlie the proposed Urban War range? Will Guard convoys be used in the AF 2016 EA Convoy Training on the Bruneau-Grasmere road – portions of which lie under a “wheel” of the CAS Range?

AF Response: Sections 2.1 through 2.1.6 describe the air and ground operational activities associated with the Proposed Action.

What foreseeable state land actions may take place or may the military be contemplating in this vast project area and its surroundings? For example, there is the long pending proposed state-BLM land exchange at Big Hill, just on edge of the project area – where the state inexplicably seeks a rugged dry high point that is very poor grazing lands. There have been concerns that the state seeks the land to use it for various military purposes, as no suitable explanation for acquisition has been provided.

AF Response: Sections 2.1 through 2.1.6 describe the air and ground operational activities associated with the Proposed Action.

Full analysis of the existing and foreseeable military footprint in southern Idaho must take place in an EIS.

FAA Role, Civilian Flight Concerns Questions

What is the FAA role in overseeing, regulating, or granting permission to the Air Force to carve out a new range airspace at 10,000 to 18,000 feet, or other elevations that flights involved with this range could foreseeably take place?

AF Response: The Federal Aviation Administration controls airspace. FAA-controlled airspace is available to all aircraft to include the Department of Defense (DoD). Military aircraft, including those from MHAFFB, routinely fly within the NAS, and perform the same instrument procedures as commercial, corporate, and general aviation. As a standard practice, the flight plan is filed with the FAA prior to take-off. Pilots would coordinate with air traffic control in accordance with existing flight safety rules. Standard airspace deconfliction practices through pilot communication with air traffic control would be followed. Adjustments to local flight patterns are monitored by Air Traffic Control (ATC) radar and aircraft transponders. If the Proposed Action moves forward, the 366FW/A3TS will establish letters of agreement with the FAA/ATC for all IFR flights scheduled and operated under this proposal. Any VFR Flights under this proposal will be conducted in accordance with both Federal Aviation Regulations and Air Force Instructions.

Has the FAA been allowing military activity in the 10,000 to 18,000 ft. zone already? If so, how often and what has the activity been? What NEPA or other analysis has been conducted? Is this found on aviation maps?

AF Response: The Federal Aviation Administration controls airspace. FAA-controlled airspace is available to all aircraft to include the Department of Defense (DoD). Military aircraft, including those from MHAFFB, routinely fly within the NAS, and perform the same instrument procedures as commercial, corporate, and general aviation. As a standard practice, the flight plan is filed with the FAA prior to take-off. Pilots would coordinate with air traffic control in accordance with existing flight safety rules. Standard airspace deconfliction practices through pilot communication with air traffic control would be followed. Adjustments to local flight patterns are monitored by Air Traffic Control (ATC) radar and aircraft transponders. If the Proposed Action moves forward, the 366FW/A3TS will establish letters of agreement with the FAA/ATC for all IFR flights scheduled and operated under this proposal. Any VFR Flights under this proposal will be conducted in accordance with both Federal Aviation Regulations and Air Force Instructions.

Won't incessant military use of this space - including use of technology like lasers or other military devices - potentially interfere with civilian aircraft below the military planes or elsewhere? Will civilian pilots or passengers in planes in this airspace, or above or below it, be exposed to various military devices?

AF Response: Section 2.1.6 of the EA addresses how the low-power, eye-safe, training lasers would be used for the Proposed Action.

The EA discussion of airspace currently used and designated at present is difficult to understand.

Has there been a public process or NEPA process regarding Military control of this airspace (10,000 to 18,000 ft) across much of southern Idaho? If so, when and what did that entail? Is this considered the process? Has there been there any FAA NEPA analysis?

AF Response: The airspace over Boise is a part of the National Airspace System (NAS) (controlled by the Federal Aviation Administration). The NAS is available to all aircraft to include the Department of Defense (DoD). Military aircraft, including those from MHAFB, routinely fly within the NAS, and perform the same instrument procedures as commercial, corporate, and general aviation. Also, MHAFB complies with the AF EIAP. FAA ensures compliance with the FAA NEPA process.

Fore-Ordained Outcome NEPA Process

The Scoping and EA state:

*Purpose. The purpose of the Proposed Action is to ensure F-15E aircrews from the 366 FW can conduct Urban CAS proficiency training within the full range of urban ground and airspace environments with ground support from JTACs. **Only this combination of training conditions would adequately simulate the current mission realities of urban combat.*** This statement shows the process will be biased to reach a fore-ordained conclusion. This undercuts a full and fair NEPA Process. The DOPAA and now the DEA Purpose and Need arrive at a fore-ordained conclusion – that only this single Nine Cities alternative action will do. In Internet searches, we can find no place where any other branch of the Service has ever proposed such an unprecedented ground and air War range over top and within an urban population in the U. S – let alone impacting a million people. How could other branches of the Service, and other airbases, get by with use of the vast Military lands and bases, but not Mountain Home? The Air Force claim must be fully analyzed with sound data to determine if they are valid or not. This alone demonstrates the need for an EIS to be prepared.

AF Response: Section 1.5 describes the purpose of and need for the Proposed Action. Section 2.1.4, page 2-2 of the document defines the ground support activities associated proposed action. Ground support teams will only operate along paved public roads, will abide by standard traffic safety regulations and behave in a manner typical of the average citizen, and will not enter any buildings. Ground support will not operate outside urban environments.

The statement that only the proposed action will do is shown to be false by the broad array of proficient CAS training that has been taking place at other bases across the country, and where MHAFB can also practice – rather than harming half the civilian population of Idaho. MHAFB could also place more facilities at Saylor Creek or Juniper Butte. Regrettably, the AF has already burned up nearly all the native vegetation in a long series of “range” fires, within Saylor Creek that spread to surrounding lands. So the land area there is highly degraded and it is uninhabited.

AF Response: MHAFB is a proactive steward of the lands managed by MHAFB. JBR has been used for 20 years, no fires have occurred. Native vegetation is intact. SCR is 109K of that, 97K is public use area which supports hunting, grazing, recreation. Fires have occurred in the 97K public use area and where all natural occurring. There have not been any AF training related fires in the public use area. Also, MHAFB conducts annual programs to reduce invasive vegetation, increase sage grouse habitat, and reduce fuel loads. SCR and JBR are neither highly degraded nor uninhabitable.

FONSI for Unprecedented CAS War Range Is Unlawful under NEPA

The AF stated: “if significant impacts were predicted, then USAF would decide whether to provide mitigation to reduce impacts below the level of significance, undertake the preparation of an EIS, or abandon the Proposed Action”.

Now the AF has produced a Draft FONSI that briefly describes the proposal and what the AF desires, but takes no hard look at significance factors necessary to arrive at a FONSI. Yet no proper clear baseline of No Action has even been provided, and the EA provides minimal review of the direct indirect and cumulative effects on the environment. Citations used in the EA do not include sources that show harmful effects of noise, pollution, psychological trauma to members of the civilian population such as refugees or people with PTSD or Pacifists or regular citizens who do not want their selves, children, property, animals used by the military for Urban Combat.

The minimal information in the FONSI raises a host of questions. For example:

Do existing flight operations include the new Singapore War Planes now authorized? It now appears that Urban War activities will also continue on the military Withdrawn lands/Ranges in Owyhee County- is that the case? The mapping shows that the Urban Combat Range will be contiguous with the Owyhee military zone. Will Urban War activities take place in both areas?

AF Response: Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act to assess impacts that would result from implementing the proposed pilot proficiency training. Mountain Home AFB coordinated with regulators from the early planning stages, through public scoping, and through review of the EA to ensure awareness of the proposed training activities and the analysis approach. Because the proposed flight and ground operations would be limited in scope, and would be conducted as described in **Sections 2.1 through 2.1.6**, impacts on certain resources either would not occur or would not have greater than negligible impacts. Therefore, those resources were reasonably and justifiably excluded from the full analysis (see **Section 3**, pages 3-1 and 3-2). A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an Environmental Impact Statement will not be required.

Solid rationales are not provided for justifying this unprecedented assault on a civilian population, or for the AF discarding a reasonable range of alternatives suggested in Scoping.

The AF references it must have the Idaho cities vertical development, population, physical distinction, and artificial lighting, in trying to cast aside any other course of action. Please explain how the Air Force manages to train at Nellis military Withdrawn land Range areas for Urban Combat just fine, but MHAFB just can't do so at its huge range sites in Owyhee County.

AF Response: As explained in **Section 1.5**, the purpose and need for the Proposed Action is multifaceted, and includes: aircrew proficiency training, communication and coordination with ground support, gaining practical experience in identifying, tracking, and conducting in-air laser designation of identified targets. **Section 2.2** for the selection standards and analysis of reasonable alternatives for achieving the purpose and need of this required training.

This sweeping conclusion in the Draft FONSI has no solid baseline data and analysis behind it.

Finding of No Significant Impact

Based on the information and analysis presented in the EA, which was prepared in accordance with the

requirements of NEPA, the Council on Environmental Quality regulations, implementing regulations set forth in 32 Code of Federal Regulations § 989 (Environmental Impact Analysis Process), as amended, and based on review of the public and agency comments submitted during the 30-day public comment period, I conclude that the environmental effects of establishing Urban CAS air and ground training spaces in urban centers in Idaho, is not significant, that preparation of an Environmental Impact Statement is unnecessary, and that concluding the NEPA effort with a FONSI is appropriate.

What does the Air Force consider as significant?

AF Response: Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act to assess impacts that would result from implementing the proposed pilot proficiency training. Mountain Home AFB coordinated with regulators from the early planning stages, through public scoping, and through review of the EA to ensure awareness of the proposed training activities and the analysis approach. Because the proposed flight and ground operations would be limited in scope, and would be conducted as described in **Sections 2.1 through 2.1.6**, impacts on certain resources either would not occur or would not have greater than negligible impacts. Therefore, those resources were reasonably and justifiably excluded from the full analysis (see **Section 3**, pages 3-1 and 3-2). A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an Environmental Impact Statement will not be required.

The impacts are highly significant as this proposal is for an unprecedented War Combat Air and Ground Range in the Air affecting nearly a million people Idaho citizens across southern Idaho – and affecting the citizens physical and mental health, well being and peace of mind. It sweeps the citizens, their vehicles and property up as unwitting participants in War Games. It involves the military treating American cities as hostile territory. It imposes the most use on Boise. The AF defined a “Large” city so there was only one. This all maximizes the potential for large-scale loss of life in plane crashes and maximum exposure of the most civilians exposed to noise, pollution and trauma of Urban War Combat activities. This is the context of the proposal, too.

It is highly controversial as it intrudes in many significant ways on Idaho citizens lives and property, and exposes citizens to lasers, noxious noise, increased air pollution, and other adverse environmental effects that may also impact health. It represents a danger to civilian health and safety – what if a training F-15 or other plane which may replace them crashes into the 10 story buildings in downtown Boise, for example? Or what if the War Planes’s laser mode accidentally gets switched? Or if the “eye safe” lasers end up causing harm? MHAFFB has already admitted Urban Combat in Idaho cities is controversial in its 2016 Convoy Training EA.

AF Response: The Environmental Assessment for Operational Changes and Range Improvements in the Mountain Home Range Complex, 17 Jul 2017 addressed JTAC training per JTAC requirements. These requirements would be seen as controversial if proposed within local populations. Under the proposed Urban CAS training, JTAC operations are defined to meet MHAFFB operators training requirements (see **Section 2.1.4**). JTAC training will continue on MHAFFB managed lands.

It is impossible for a decision maker to adequately understand beneficial or adverse effects, and their intensity - as a proper baseline has not been presented (noise, amount of military activity already taking place, pollution, contrails, disturbance to animals, how lasers may affect animals or harm people, exactly how “urban canyons” will be exploited while avoiding schools, churches, etc. For example, how many schools, churches, etc. are in the Boise “Urban Canyon” and where are they located? This info is crucial to determine if the proposed activities could even be conducted and the AF truthfully be avoiding these sites. Also, the EA information that is presented is very confusing (flights/sortie info, noise, airspace, etc.), is at times contradictory and relies on only a narrow range of scientific information.

AF Response: Noise is modeled using NOISEMAP, a suite of computer programs and components to predict noise exposure due to aircraft operations. Air Force Instruction (AFI) 32-7063, Air Installations Compatible Use Zones Program, provide land use guidelines for noise exposure. Operational parameters used in the analysis conservatively assumed all operations would occur at each urban center. Additionally, the analysis used thresholds more conservative than the American National Standard Institute for determining impacts on noise sensitive receptors. The impacts from the proposed flight training operations would be less than significant.

To sign a FONSI, a decision maker must ensure that the action does not set a precedent. This certainly does set a precedent – perpetual Urban War Combat over and among a growing civilian population. If the AF gets this Range, it is likely others will follow - as Military Bases compete with each other for new shiny “training” facility. It also sets a precedent of allowing foreign War Planes to use American cities and citizens and consider parties operating in them as “enemy” forces, and for the military treating American cities as home to enemy forces.

AF Response: Section 1.5 provides the purpose of and need for the Proposed Action. Section 2.2 describes the Selection Standards that were used to determine which urban centers would adequately support the Proposed Action. Sections 2.1 through 2.1.6 describe the air and ground operations associated with the Proposed Action. Mountain Home AFB will comply with AF EIPA until directed otherwise.

The Urban War proposal consists of several actions with cumulatively significant effects. It involves both Air and Ground training, use of potentially harmful technology where mistakes could be made, emits more air pollution among high density civilian populations in areas that already have significant air pollution issues and that suffer winter inversions (where pollution is a serious problem and noise can be amplified by atmospheric conditions). It involves creepy military ground force personnel pretending to be civilians intruding on neighborhoods – video-streaming of images of people, places and property; the potential use of people, places, property as targets including if errors are made in separating out the disguised JTAC ground people. It involuntarily “conscripts” citizens including pacifists, refugees who have suffered War Trauma, veterans with PTSD and others as participants in War Games. The Air Force considers Idaho citizens not be people, but “chaos” - further dehumanizing us. Concerns have even been raised if this is Military “practice” for subduing American citizens in American cities in the future. It is particularly alarming that foreign forces could use U.S. cities as places with Enemy forces. Plus the psychological effects on pilots of Urban Combat in their own country.

The EA lacks essential baseline information so it is not possible to support a FONSI.

The AF has not mitigated harmful elements or serious public concerns with the proposed activities –ignoring public comment at Scoping meetings about disguised forces, for example. The Urban Combat is likely to morph and mushroom over time as the War Range activities change (planes, devices, intensity, foreign users, etc.). Please provide detailed information and analysis of what any mitigation measures would be.

AF Response: The proposed action is for MHAFB F-15Es and F-15SGs stationed at MHAFB and JTAC groups (who would operate as defined in the purpose and needs section of the draft EA. Additionally, F-15E/F-15SG are flown by a pilot and a weapons system office (WSO). There is a division of duty in the cockpit. The pilot flies the aircraft; the WSO operates the laser. Crew coordination is required to use the laser system in the appropriate manner. The division of duty ensures a check and balance during operation.

Aircrews use VHF (30-300 megahertz) and UHF (300mg-3gigahertz) radio frequencies. VHF/UHF are standard frequencies are used world-wide. The frequencies have been set aside by the FCC for aviation use. There are no negative effects associated with these standard frequencies. The F-15E only utilizes VHF on the 108-137 MHz band and on UHF in the 225-400 MHz band. These are the frequencies actually allocated to aviation by the Federal Communications Commission, which is actually a smaller range of frequencies than currently listed in the comments.

Public Lands Impacts, “Protected” Species Concerns

The AF loosely references “protected species”. What does the EA mean by “protected” species? There are many BLM sensitive and Forest Service sensitive species/species of concern inhabiting the public lands that may be impacted or disturbed by incessant plane noise, or exposed to lasers or other harmful military activity, suffer disturbance that disrupts use of habitats, endure intrusive noise that disrupts communication, reproductive behavior, etc., as well as other adverse impacts. These species are considered sensitive because of the rarity or declining populations due to habitat loss and human disturbance, and the EA ignores any valid consideration of them.

AF Response: Sections 2.1 through 2.1.6 describe the air and ground operational activities, including how the low-power, eye-safe, training lasers would be used, that would be conducted for the Proposed Action. Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act to assess impacts that would result from implementing the proposed pilot proficiency training. Mountain Home AFB coordinated with regulators from the early planning stages, through public scoping, and through review of the EA to ensure awareness of the proposed training activities and the analysis approach. Because the proposed flight and ground operations would be limited in scope, and would be conducted as described in Sections. 2.1 through 2.1.6, impacts on certain resources either would not occur or would not have greater than negligible impacts. Therefore, those resources were reasonably and justifiably excluded from the full analysis (see Section 3, pages 3-1 and 3-2). A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the EA (Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3), the proposed training would not result in significant impacts on resources. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an Environmental Impact Statement will not be required.

Appendix A, page A-1 lists the stakeholders and agencies with which, Mountain Home AFB coordinated throughout the NEPA effort for this Proposed Action. All listed were provided access to the DOPAA during early planning and scoping, and the Draft EA/Draft FONSI during the public comment period. Any comments received can be found within Volume II of the EA. Sections 2.1 through 2.1.6 describe the air and ground operational activities, including how the low-power, eye-safe, training lasers would be used, that would be conducted for the Proposed Action.

The EA fails to provide full baseline current site-specific data and analysis on these sensitive species occurrence, their habitats (and the quality and quantity of habitat), the status of their local and regional populations, and the threats these species currently face. How will this proposal add to the threats faced by these species? How much plane noise or other activity disturbance will they be exposed to? What will the impacts of day military activity be on these? Of night activity? Of laser use or other technological devices that may be used? How much will plane noise increase over sage-grouse populations south of Twin Falls and Burley, for example? While the AF claims overflights will avoid certain areas, that does not mean that ground crews might not operate in them, disturbing wildlife. The planes may not be overhead of where the “enemy force” is – for example.

AF Response: Sections 2.1 through 2.1.6 describe the air and ground operational activities, including how the low-power, eye-safe, training lasers would be used, that would be conducted for the Proposed Action. Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act to assess impacts that would result from implementing the proposed pilot proficiency training. Mountain Home AFB coordinated with regulators from the early planning stages, through public scoping, and through review of the EA to ensure awareness of the proposed training activities and the analysis approach. Because the proposed flight and ground operations would be limited in scope, and would be conducted as described in Sections. 2.1

through 2.1.6, impacts on certain resources either would not occur or would not have greater than negligible impacts. Therefore, those resources were reasonably and justifiably excluded from the full analysis (see Section 3, pages 3-1 and 3-2). A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the EA (Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3), the proposed training would not result in significant impacts on resources. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an Environmental Impact Statement will not be required.

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The AF states: “USAF is required to manage impacts on protected species and their habitats, floodplains, and wetlands in accordance with AFI 32-7064, Integrated Natural Resources Management, which includes the USAF guidance for compliance with the Endangered Species Act, Executive Order (EO) 11988, Floodplain Management, and EO 11990, Protection of Wetlands.

Although intermittent populations of federal- and state-listed species, floodplains, and wetlands are within several of the urban centers where Urban CAS training could occur, the proposed training activities would not impact these resources. No impacts would be expected because operations would not involve ground disturbance and would avoid areas where protected species and their habitats exist”.

How does noise affect wetland and aquatic species? What happens if a military plane (F-15, foreseeably F-35 or other) crashes or has to drop low or otherwise malfunctions over, into or near wetlands and the many species that inhabit them? There are state wildlife areas, the Snake River Birds of Prey Area and the Snake River, and other high value wetlands in the project Footprint. These are many areas highly used by the public for recreation, and military noise and overflights may interfere with enjoyment of that use, or impact animal behavior – affecting birders, sportspeople, etc.

AF Response: MHAFFB would follow defined mishap procedures.

Where is all important or crucial big game wintering range? What are the categories of sage-grouse habitat that may be overflowed? What do USFWS migratory bird censuses show about presence of sensitive species in lands of the 30 NM diameter CAS circles?

AF Response: As described in the EA, F-15E and F-15SG aircraft would be flown between 10,000 feet AGL and 10,000 feet MSL. Noise impacts on the ground would be as described in Section 3.1.3.1.

The EA states: *The Proposed Action and the No Action Alternative would not result in ground disturbance or construction; therefore, disturbance, fragmentation, or removal of terrestrial and aquatic habitats would not occur and no effect on vegetation, wildlife, or protected species would be expected. Noise levels associated with the Proposed Action would not be of sufficient magnitude to result in the direct loss of individuals or reduce reproductive output.* The AF focuses on effects that kill animals outright. The AF has not adequately described noise, including very low frequencies emitted by military planes, wildlife aversion to lasers and potential physical damage to animals, or ground force disturbance and displacement effects on wildlife. Effects cannot be limited to dead animals. They must include physical displacement, behavioral avoidance, and sub-lethal effects of an activity.

We submitted info showing many species of wildlife react negatively to lasers – yet the AF has disregarded this in claiming: Simulated munitions would include low-power, eye-safe lasers which would have no potential to impact wildlife or protected species.

Additionally, wildlife conservation and refuge areas such as the National Wildlife Refuge Areas present on islands within the Snake River, the Minidoka National Wildlife Refuge, and the Morley Nelson Snake River Birds of Prey National Conservation Area would be avoided by aircrews. There are also Areas of Critical Environmental concern, Foothills Reserves and many other cherished much-used public spaces.

Please name all public land areas that would be avoided by aircrews and provide distances of “avoidance”. This is like the EA claim that JTAC would not operate near schools, churches, hospitals – making operation in downtown Boise and the Boise metro area well nigh impossible. Please provide mapping of where specifically aircrews and JTAC would operate and what land areas would be avoided across public lands and Open Space.

AF Response: Section 2.1.4 describes the ground operational activities that would be conducted for the Proposed Action.

It is absurd to claim that *no additional effects on migratory birds would be expected because the overall number of air operations would remain the same, only distributed among the installation, MHRC, and the nine urban centers*. The number of operations is but one factor that must be considered. The location of sensitive species habitats and their exposure to War Game activities is a primary matter that must be assessed.

Has Urban CAS Training Been Taking Place Outside the Owyhee Ranges?

AF Response: The Environmental Assessment for Operational Changes and Range Improvements in the Mountain Home Range Complex, 17 Jul 2017 addressed JTAC training per JTAC requirements. These requirements would be seen as controversial if proposed within local populations. Under the proposed Urban CAS training, JTAC operations are defined to meet MHAFFB operators training requirements. JTAC training will continue on MHAFFB managed lands.

The DOPAA stated: “Currently, Mountain Home AFB is home to three fighter squadrons (two F-15E squadrons and the Royal Singapore Air Force squadron of F-15SGs) under operational control of the 366 FW. Aircraft based at Mountain Home AFB conduct more than 90 percent of their flight training in the Mountain Home Range Complex (MHRC). The MHRC consists of the Saylor Creek and Juniper Butte Gunnery Ranges as well as airspace that consists of six military operations areas (MOAs) and an associated Air Traffic Control Assigned Airspace (ATCAA), allowing aircraft to train at altitudes up to 50,000 feet mean sea level (MSL). The MOAs within MHRC airspace are Paradise North, Paradise South, Owyhee North, Owyhee South, Jarbidge North, and Jarbidge South. Additionally, other aircraft from Air Combat Command, Air National Guard, sister services, and foreign allies regularly train in the MHRC. Although F-15Es are flown through all nearby airspaces, military training routes, MOAs, Federal Aviation Administration and ATCAA - controlled airspaces, all authorized Urban CAS training is currently restricted to Mountain Home AFB and its ranges”.

First, this shows the Air Force already has an immense area – millions of acres – to conduct its Urban CAS “training” in, including simulations and existing fake building sites on military Withdrawn lands. Fake building sites and other features specifically built for Urban CAS were recently upgraded and expanded on the MHAFFB Range based on the 2016 MHAFFB Convoy EA.

It is highly foreseeable that Singapore planes, transients based at other U. S military bases, and other foreign military planes will eventually be using the Urban War Range, as many of these entities already use the Owyhee Range areas. In fact, in 2016, IDANG was actively trying to lure planes to refuel at the Boise airport, and then train over the MHAFFB Owyhee Ranges. Also, as the F-15 is slated to be replaced by F-35s. The AF DOPAA described that the IDANG uses all its Range space. So if F-35s or other planes beddown at Gowen/Boise

airport, it is highly likely they will use the Urban War Range.

From the Singapore DEA p. 2-3:

The beddown of six additional F-15SGs at Mountain Home AFB would include an increase in total airfield operations and sorties. As shown in Table 2-3, annual sorties at the airfield would increase by approximately 12 percent and annual operations would increase by approximately 14 percent. It is assumed that approximately 10 percent of total airfield operations and sorties would be conducted during the environmental night, from 10 p.m. until 7 a.m.

This number is quite similar to the Percent of MHAFB training that constituted Urban CAS taking place at the Saylor Creek/Owyhee Ranges that was provided as a baseline in the DOPAA, and which would be transferred to Boise and other cities. [SEP] DOPAA Page 1-5: "*The baseline total for flight operations at Mountain Home AFB is approximated at 70,704 operations per year and includes all Mountain Home AFB and transient aircraft operations (AFCEC 2017). Approximately 260 training events involving approximately 6,760 flight operations are conducted annually for Urban CAS training. Thus, the annual total of Urban CAS operations represents approximately 9.5 percent of the installation's annual baseline for flight operations.*" [SEP]

As we described previously in these EA comments, the AF now claims the current CAS War flights/activity being conducted has been less (approx. 60,000) and this percent is much less. The information and percentages provided are very confusing. [SEP]

It appears the Idaho public may be suffering big plans unfolding – without ever being told the full story by the military. This appears to be segmented and piece-mealing of NEPA. What are all the components of the military plan that is unfolding? Segmenting and piece-mealing connected actions is a violation of NEPA.

Has there been unauthorized or other Urban CAS activity taking place over any Idaho citizen populations? Please specifically respond to this. This question was asked at Scoping meetings, and answers were vague and uncertain. [SEP] If so, when, where, how many sorties, and what on the ground activities have been taking? Has there been other CAS training – in a gray area between authorized or unauthorized? If so, how was it authorized? Please see our later questions in discussion of the DOD IM about use of state, federal or private facilities, and also Guard-related activities. Where else in the U.S. does Urban CAS training take place over a civilian population on a permanent "Range"? Where else does it take place on military installations specifically designed for CAS training?

AF Response: Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act and in accordance with the USAF EIAP to assess impacts that would result from implementing the proposed pilot proficiency training. Operations would be coordinated and conducted in accordance with existing federal, state, local, and DOD regulations (e.g., DODI 1322.28).

No one has provided a satisfactory explanation for intrusive military aircraft at times circling, and circling, and circling for prolonged periods of time over and around Boise annoying Boise residents in their homes, workplaces and outdoors. People become more sensitive to it, especially the lower frequency noise of War planes. The military plane activity already taking place in Boise interferes with citizens' work, quality of life, recreation and other activities, and subjects citizens to noise and air pollution. The adverse health impacts of exposure to noise are cumulative.

Baseline of All Military Plane and JTAC or other Ground Activity Across Project Area Must Be Provided

Please provide detailed baseline information on ALL military plane or other activity (including IDANG, transients, planes from other bases, foreign military, JTAC, etc.) that currently takes place within the project area and also MHAFB Ranges. Be sure to include any "training" that has taken place within the Nine Cities area

from 2008 to the present including any Urban CAS activities.

AF Response: Section 3.3 of the EA addresses Airspace Management.

What is the SEL and all other noise levels for all of these training activities at all elevations they are being flown at Saylor Creek or other installations at present? What will it be with the EA proposal? How far will noise travel, and at what levels, under various terrain and weather/atmospheric conditions – as this proposal would impose the activity during all types of weather conditions? Where will air pollutants drift over? What are predominant weather patterns and how might this impact noise, pollution, and other factors.

AF Response: Section 3.1 of the EA provides information on the noise analysis conducted for the Proposed Action. Section 3.1.3.1 describes the anticipated impacts from conducting the proposed Urban CAS aircrew proficiency training.

The MHAFB Complex already includes a vast array of facilities. The Air Force is always incrementally adding more, and expanding its activities and footprint. It has also expanded the adverse military footprint within the ranges and across Idaho and other public lands.

Examples:

MHAFB 2008-2009 large airspace expansion over portions of the Jarbidge Wilderness; AF Singapore F-15 Beddown EA; AF NEPA for use of white phosphorus on Saylor Creek; AF 2016 NEPA for Convoy Training closing State Highway 51, and many other documents making changes in existing Range use, and aircraft (such as V-22s, new construction on Range, etc.). We are of no EIS to address the current and foreseeable use of the MHAFB Ranges, and the old Enhanced Training in Idaho (Juniper Butte Bombing Range, composite wing, etc.) EIS is woefully outdated.

The Duck Valley Shoshone-Paiute Tribe had settled litigation over the AF Juniper Butte Bombing Range EIS with the Air Force. In that Settlement, the Air Force agreed to not fly lower than 15,000 feet over the Reservation, and to entirely avoid overflying the town of Owyhee by five miles. These prohibitions have been reflected in mapping in past MHAFB Range documents. Please provide detailed information on avoidance areas and measures over Duck Valley Reservation.

There have been many more incremental changes and NEPA documents in between those listed above. From the “Enhanced Training in Idaho” (ETI) Juniper Butte Bombing Range EIS days forward, please provide a summary of all the changes and expansion of airspace, activities, facilities, etc. associated with MHAFB Ranges, and the environmental effects of these activities - including on the public health and safety, recreational uses, wildlife habitats and populations, etc. Military bases often jostle for “ratings” with one another – to ensure maximum federal dollars flowing to them. That was certainly the case with MHAFB and the Base Realignment Commission in past years. Is this proposal partially related to that?

IDANG (Army National Guard) has a large land area (Orchard Training Area - OTA) of > 150,000 acres. There have been recent efforts to expand this including a proposal for Rights of Ways on BLM land to allow new OTA Range expansion on state land south of the Freeway by Mountain Home. A major state-BLM land exchange has also been floated (by MHAFB) to enable expansion, too. There are likely other efforts we are unaware of, and that have not been made public. See WLD comments on this and other documents (Attached).

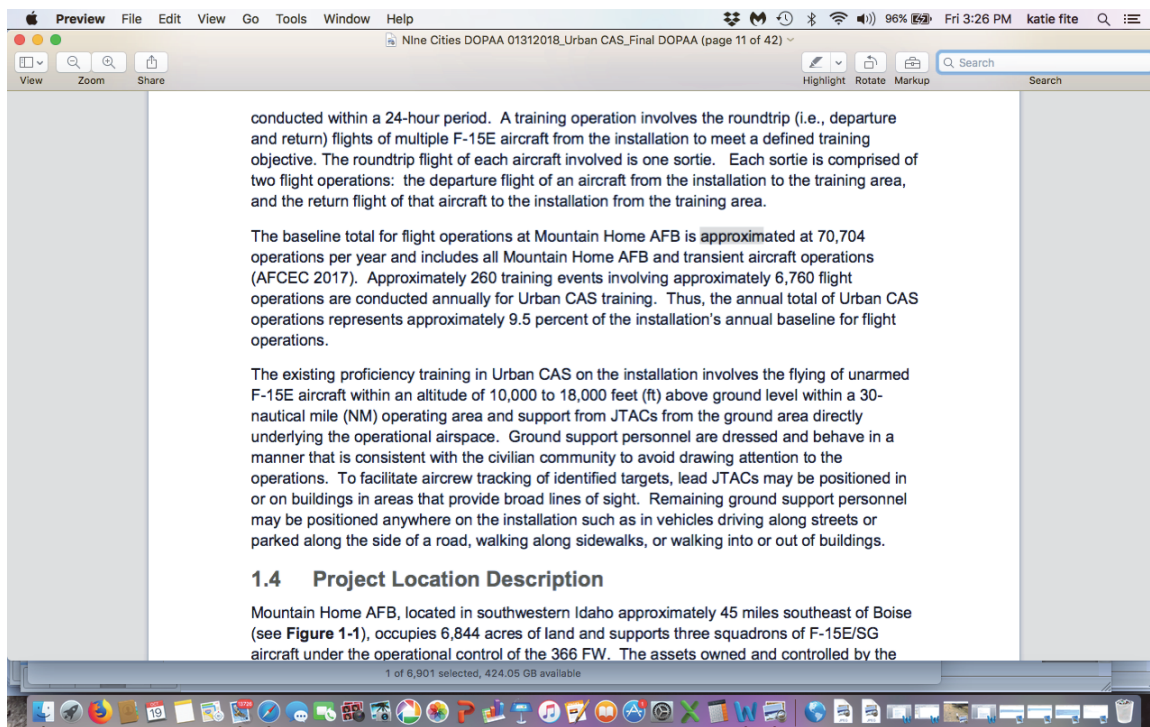
The AF must necessary to provide full and detailed analysis of the cumulative and foreseeable footprint of military activities in the project footprint and surrounding lands across the AF Ranges and Military airspace/MOAs.

It must also explain why, if flights between 10,000 and 15,000 feet are so unobtrusive, the Tribes felt strongly enough about the noise at those elevations to get a 15,000 ft. requirement, and also complete avoidance of the town of Owyhee. This current Urban Combat proposal is the dead opposite of that.

Perpetual War Range = Perpetual Battery of Flights and JTAC Operations

The civilian population of southern Idaho will be subjected to an immense never-ending battery of military flights. The DOPAA stated: “*Urban CAS operations are discussed in terms of training events, training operations, sorties, and flight operations. A training event involves a collection of training operations conducted within a 24-hour period. A training operation involves the roundtrip (i.e., departure and return) flights of multiple F-15E aircraft from the installation to meet a defined training objective. The roundtrip flight of each aircraft involved is one sortie ...*

The baseline total for flight operations at Mountain Home AFB is approximated at 70,704 operations per year and includes all Mountain Home AFB and transient aircraft operations (AFCEC 2017). Approximately 260 training events involving approximately 6,760 flight operations are conducted annually for Urban CAS training. Thus, the annual total of Urban CAS operations represents approximately 9.5 percent of the installation’s annual baseline for flight operations”.



The EA now states: “*The baseline total for airfield sorties and operations at Mountain Home AFB is approximated at 60,559 operations per year and includes all Mountain Home AFB and transient aircraft operations (AFCEC 2017). Annually, approximately 160 training events involving approximately 960 sortie operations are conducted on the installation for Urban CAS training. Thus, the annual total of Urban CAS operations represents approximately 1.5 percent of the installation’s annual baseline for airfield sortie operations.*

So how does one reconcile 70,704 vs. 60,559 operations per year and 9.5 percent of baseline flight ops vs. 1.5 % of the installation ops.?

How will Singapore’s new War Planes change these figures? What other foreign militaries and military units train at the MHAFFB Ranges at present?

Please explain these discrepancies and provide much more detailed baseline information. Is it 70,704 or 60,559 flights? We are greatly puzzled at how the number of CAS operations compared to total flights being conducted has suddenly changed from 9.5 to 1.5? How did the number of training events go from 260 in the DOPAA to 160 in the DEA? Why does the AF in the EA claim flights have been reduced in response to public concern – when it appears the AF may have used the wrong baseline numbers in the DOPAA? Note the tables and info on flights are very confusing in the EA.

Also, the DOPAA stated: *“The existing proficiency training in Urban CAS on the installation involves the flying of unarmed F-15E aircraft within an altitude of 10,000 to 18,000 feet (ft) above ground level within a 30-nautical mile (NM) operating area and support from the ground area directly underlying the operational airspace. Ground support personnel are dressed and behave in a manner that is consistent with the civilian community to avoid drawing attention to the operations. To facilitate aircrew tracking of identified targets, lead JTACs may be positioned in or on buildings in areas that provide broad lines of sight. Remaining ground support personnel may be positioned anywhere on the installation such as in vehicles driving along streets or parked along the side of a road, walking along sidewalks, or walking into or out of buildings”.*

This military on the ground activity and military operatives present where unknowing civilians are present is creepy and sinister. So is the lurking around parking lots sidewalks, neighborhoods and the use of buildings remains unclear. The EA claims buildings won't be used, but that is the reality (use of buildings) of how JTAC training takes place.

Citizens may come in the line of sight (or “fire”) of lasers and other military devices. Lasers are increasingly used for video streaming. Military personnel may use civilians for “cover”. This is a military infringement on the public's right to peaceably use public spaces as well as private spaces and their own residences/buildings/property. Domestic animals and wild animals may come in the line of sight of lasers or be disturbed by ground forces.

Throughout the discussion of baseline CAS activities (and in our own discussions with a JTAC person) we have learned that JTAC personnel often operate on buildings, and War Planes fly lower than what is described in the EA. How can the public be assured this use of buildings will not take place, or be changed after a decision is made?

The EA refers to “low-power, eye safe” infrared training lasers for marking targets, though the EA notes that the lasers could be “visible and harmful” if viewed through certain equipment.

Idaho has passed ever-more dangerous gun laws (“stand your ground”), and a new very restrictive and murky trespass law. There is potential for citizens to over-react, and harm lurking military ground personnel. How will the military ensure it is not trespassing? See:

<http://www.idahostatesman.com/news/politics-government/state-politics/article204633849.html>

“Ominous words from the Idaho Attorney General's Office on two pending pieces of legislation:

“The overlap between the proposed (bills) would likely increase the risk of serious injury or death to otherwise innocent trespassers.”

The disguised military ground personnel in and on buildings and on roads, parking lots, etc. run the risk of sparking dangerous encounters with civilians who take them for trespassers, or otherwise become concerned and “stand their ground”.

Also: “The “stand your ground” legislation has moved fairly seamlessly through the legislative process. However, the bill rewriting Idaho's trespass laws got off to a rocky start, with groups representing law

enforcement, attorneys, hunters, fishermen and public access deeply opposed. Its first draft may have been unconstitutional, and sportsmen fear it contains too many incentives for landowners to sue ...

A last-ditch effort to save the trespassing measure appears to have solved its constitutional problems, and it passed the House by a vote of 45-22 Monday. But the controversial bill could still have unintended consequences”.

Will civilians be able to sue the ground personnel for trespass if they use private property they do not have authority to use? How will the AF determine private vs. public property boundary lines?

AF Response: This question falls outside the scope of this NEPA analysis.

Other questions also abound: What is all the “electronic communications” equipment that will be used? Please be very specific and detail all the equipment and what it does and explain specifically how it will be used. Are threat emitters considered communications equipment? What type of radar will be used? What are potential hazards of health effects of this radar?

AF Response: Section 2.1.6 describes the communications equipment that would be used for the Proposed Action.

Air Force Ignores Broad Range of Reasonable Alternatives

The Air Force structured the Purpose and Need statement so that only a single alternative can be chosen. This is part of a pattern of how the Air Force structures nearly all their EAs. The Air Force ignored assessment of a range of reasonable alternatives under NEPA. Alternatives are the heart of the NEPA process. Here are reasonable alternatives that must be considered, in whole or in combination:

- Periodically fly and train intensively at other Military sites and their perfectly adequate state of the art Urban CAS ranges on military land – like Nellis. MHAFB goes to other ranges all the time for Red Flag/Green Flag/War Games anyway. Result: Many fewer civilians exposed to harm or involuntarily “conscripted” to be War Game chaos.. <http://www.airforcesmonthly.com/2016/08/21/new-usaf-f-16-cas-training-squadron-planned-for-nellis/>
- Build more fake buildings at Saylor Creek or Juniper Butte. The DOPAA asserted planes can't fly to the other sites because of time, fuel cost, whatever. Fine, save TIME and FUEL by building more fake buildings at Saylor Creek and some at MHAFB - rather than using fuel flying 100 miles each way to Burley. Result: Fuel savings, civilians not exposed to harm or involuntarily “conscripted” to be War Game chaos.
The Air Force has a long history of using fuel and time as an excuse for Range expansion --- “we couldn’t possibly train somewhere else” to expand its footprint. This has been the pattern for decades.
- Use video games/simulations. Fuel and time savings, civilians not exposed to harm or involuntarily “conscripted” to be War Game chaos.
- Construct fake buildings/CAS facilities on MHAFB. Fuel and time savings will be considerable. Many fewer civilians exposed to harm or involuntarily “conscripted” to be War Game chaos.

Use a combination of the above. Periodically go to Nellis, Yodaville CAS base areas, etc. Use simulations to train. Build more fake buildings at MHAFB or other sites. Results: Make more efficient use of time and fuel. Many fewer civilians exposed to harm or involuntarily “conscripted” to be War Game chaos.

Also regarding EA claims of Urban War Games decreasing fuel use – it is 100 miles to Burley. The Saylor

Creek Range is much closer to MHAFB including closer than Boise.

AF Response: Thank you for your comments

Proposed Action Is an Unprecedented Intrusion Into U. S. Civilian Lives and Property

The AF states: *USAF proposes to: 1) **establish air and ground training spaces in urban centers located proximally to the installation and within Idaho that would adequately simulate the large, medium, and small urban centers encountered during combat, and 2) **establish an Urban CAS aircrew proficiency training regime in the selected urban centers.** This action would not increase flight operations for the installation. Rather, it would distribute existing flight operations among the installation's ranges and airspaces and the air and ground spaces at the urban centers that are identified as also able to accommodate the proposed training.***

The baseline numbers are very unclear, and more Singapore planes = more flights.

There are many parts to this military Range intrusion into the lives and property of Idaho civilians: The Airspace, Ground Space, and constant imposition of a 'Training Regime'.

The AF stated: *The Proposed Action includes six components: 1) aircraft, 2) personnel, 3) airspace, 4) ground operating areas, 5) air and accompanying ground operations, and 6) simulated munitions.*

What are the simulated munitions that will be used? What happens if someone makes a mistake and there are real munitions? What devices will be used? Will threat emitters be used? What equipment that emits electromagnetic radiation will be used? What radars will be used? Hasn't the military developed new radar that can be harmful to humans and animals? What devices specifically will be used on the ground and in the air? How will these potentially impact humans, domestic animals, and wildlife including sensitive avian and other species?

AF Response: Sections 2.1.4 and 2.1.4 describe the ground operational activities and use of equipment for the Proposed Action.

What technology and devices will be on the planes involved? Will flares, chaff, threat emitter devices, or a range of lasers? What about on the ground? What exactly do all urban warfare training devices, including video devices, entail?

AF Response: Sections 2.1.6 specifies that munitions would not be used as part of the Proposed Action. The proposed Urban CAS training does not include the use of chaff, flares, treat emitter devices, or combat lasers by either aircrew or ground support.

Laser technologies and devices are a concern. On-line sources show lasers include IR lasers, UV lasers (many animals see UV), and lasers potentially transmitting video including images of unknowing Idaho citizens or their property across the project area. Will the type of laser device change over time? Are different lasers used on different War Planes?

AF Response: Please see Appendix E of the EA for information on the laser technology that would be used during the proposed training.

Will apartment dwellers or office occupants in Boise's "Urban Canyons" become unwitting "targets" of War Game technology such as this? Will they unknowingly look into lasers? Will lasers or other activity disturb or displace wildlife? Will pilots of small planes? What is the real risk of collateral damage or civilian injury? Will civilians unknowingly or accidentally become targeted by close proximity to the military ground personnel playing War Games?

AF Response: Sections 2.1 through 2.1.6 describe the operational activities that would be conducted for the proposed training. The proposed Urban CAS consists of JTAC and aircraft operators. The proposed training does not involve targeting civilians, animals, or aircraft.

Further, on-line sources show that “another military use of lasers is as a laser target designator. This is a low-power laser pointer used to indicate a target for a precision-guided munition, typically launched from an aircraft. The guided munition adjusts its flight-path to home in to the laser light reflected by the target, enabling a great precision in aiming. The beam of the laser target designator is set to a pulse rate that matches that set on the guided munition to ensure munitions strike their designated targets and do not follow other laser beams which may be in use in the area. The laser designator can be shone onto the target by an aircraft or nearby infantry. Lasers used for this purpose are usually infrared lasers, so the enemy cannot easily detect the guiding laser light”. Will people walk into or drive into the path of this laser or other device used? Or look out their apartment windows in the Urban Canyons of downtown Boise, and be exposed to it? Will they be in video streams/images taken or used by the military during this activity – whether intentionally or unintentionally?

AF Response: Sections 2.1 through 2.1.6 describes the air and ground operational activities, including the use of laser technology, that would be associated with the Proposed Action. Section 3.6.3.1 describes the anticipated impacts from the operation and use of lasers, as proposed.

What are the exact specifications of what an eye safe laser is? Of what is not an eye safe laser? Do lasers switch back and forth between modes of intensity? Will any of this interfere with increasing citizen use of or reliance on electronic devices – from garage door openers to timers to high tech equipment?

AF Response: F-15E/F-15SG are flown by a pilot and a weapons system office (WSO). There is a division of duty in the cockpit. The pilot flies the aircraft; the WSO operates the laser. Crew coordination is required to use the laser system in the appropriate manner. The division of duty ensures a check and balance during operation. Please see Appendix E for laser technology. Additionally, Aircrews use VHF (30-300 megahertz) and UHF (300mg-3gigahertz) radio frequencies. VHF/UHF are standard frequencies are used world-wide. The frequencies have been set aside by the FCC for aviation use. There are no negative effects associated with these standard frequencies. The F-15E only utilizes VHF on the 108-137 MHz band and on UHF in the 225-400 MHz band. These are the frequencies actually allocated to aviation by the Federal Communications Commission.

The AF states: *Aircrews would consist of two pilots and at least one weapons system operator per aircraft. Ground personnel involved in the training operations would form two operating teams: FFOR and OPFOR. Up to 15 personnel would simulate FFOR and would include JTACs. Up to 20 personnel would simulate OPFOR.*

This is a lot of people lurking around parking lots, buildings (?0, neighborhoods and public and private spaces – using various devices on a year round basis, day or night.

This is also concerning, because the ground crews could be a foot in the door for IDANG use of this new range. Will IDANG or other Guard personnel foreseeably be used? IDANG is seeking beddown of the noxiously loud F-35s. It is our understanding that there are JTAC personnel at Gowen Field. The DOPAA states: “*The Proposed Action would use existing aircrew personnel operating at Mountain Home AFB*”.

Please define what “operating out of” means. If a squadron of F-15s from New Mexico would temporarily be at Mountain Home as part of an exercise, would they be considered “operating out of”?

AF Response: The proposed Urban CAS training is for the F-15s based at MHAFB.

Define “near” – what specific distance is “near”? Won’t vehicles drive by these sites, and isn’t part of the War Game targeting people in vehicles, too? Won’t planes fly over these sites, too?

AF Response: Under the proposed action, F-15s would fly between 10K' - 18K', and 15NM radius of the city center. JTAC will operate in accordance with all local traffic laws, will not violate private space or property, and will behave in a manner typical of the average citizen. JTAC will adhere to parameters within the Draft EA.

Again, many Idaho citizens do not want strangers lurking around parking lots and neighborhoods. They do not want radar or videos imaging their vehicles or person or homes. If they frighten people, it may be dangerous for both the disguised personnel and residents.

Details on Singapore Activity Must Be Provided

One-third of the training operations for the Singaporean Air Force. Is this being done primarily for economic purposes? Who benefits financially from this arrangement? The USAF, at the request of Singapore's Ministry of Defense, has now increased the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. Since the DOPAA was issued, the EA for these additional Singapore military forces based at Mountain Home has been finalized.

One Singaporean news story quotes a local politician boasting about protecting his constituents in Singapore from harmful noise pollution from military aircraft. It seems Singapore has shifted this problem to Idaho.

Several other countries operate their own versions of the F-15. What other foreign militaries could foreseeably be expected to utilize Idaho's new large urban combat zone to avoid unwanted impacts in their own countries?

AF Response: The proposed action is for MHAFB F-15Es and F-15SGs. The 428th Fighter Squadron (FS) (stationed at MHAFB) is the U.S. flagged FS of the Peace Carvin V program, a long term partnership with the Republic of Singapore. The squadron is dedicated to the training of Singaporean aircrew in the F-15SG. Singapore is a critical U.S partner in the Pacific region. The primary purpose for the 428th at MHAFB is to provide training for effective combat readiness of an important partner nation, fulfilling the need to train as a team to perform in a multinational force structure. The U.S. DoD's partnership with Singapore benefits the well-being and national security of the U.S. and the Pacific Region. (4) MHAFB informed the public, during all public meetings, that the proposed aircrew proficiency training would be conducted for F-15E and the F-15SG pilots.

War Game Sites –How Can JTAC Operate if AF Actually Avoids Areas?

Please identify specific sites where the ground part of the War Games will take place, and the feasibility of conducting Urban Combat training while avoiding all the places the EA claims will be avoided. The EA states:

During operations, ground teams would not enter any buildings; operate near schools, hospitals, churches, or cemeteries; and would not operate in public parks. Use of routes and surface parking lots would be coordinated, as required by DODI 1322.28, with the appropriate government authorities.

Please provide mapping of all churches, parks, hospitals, cemeteries, etc. and provide the avoidance distance that will be used from all these sites. We understand that the military has quite detailed maps of many areas, so it seems these areas are known. Maps and specific avoidance distances must be provided so it is possible to understand if it is even possible to conduct these activities in high-density population areas.

AF Response: Section 2.1.4 describes the ground operational activities that would be conducted as part of the proposed training.

What does “during operations” mean? Could ground crews be pre-positioned before the overflights start inside

buildings or on roof tops – as this is how CAS is claimed to be currently conducted.

Many private businesses may not want their parking lots used for military purposes or JTAC entering them or using customers and their cars for “chaos”. How will they be informed? Many customers may not want to be swept up as chaos in War Games. How will they be informed?

AF Response: Section 2.1.4 describes the ground operational activities that would be conducted as part of the proposed training.

Paved roads may access private residences. Many Idaho citizens do not want this militarization of their cities and neighborhoods. The AF states: *Generally, ground teams would be driving along paved public roads. Vehicles may, momentarily, park along the side of a paved road, sidewalk, or in parking lots, to allow individuals to exit the vehicles to establish or re-establish communications with aircrews. Uses of routes and surface parking lots would be coordinated, as required by DODI 1322.28, with the appropriate government authorities.*

AF Response: Section 2.1.4 describes the ground operational activities that would be conducted as part of the proposed training.

Many Unanswered Questions about DODI 1322.28

The following concerns about the proposed actions using protocols of DODI 1322.28, “Realistic Military Training (RMT) Off Federal Real Property”, remain inadequately addressed.

DODI 1322.28 appears riddled with exceptions and uncertainty, with many loopholes and “deviations” described below. It appears to allow large loopholes in notification of local authorities, and notification of citizens, of what is taking place. This elevates concerns about accidents, hostile encounters or reports to police by citizens concerned about lurking JTAC ground personnel, laser use, or other activities civilians may perceive as threatening. The DOPAA stated:

Further, all activities would be conducted in accordance with local laws and ordinances and with the goal of leaving no trace of their activities on cultural or natural resources. Any deviations from these restrictions would be coordinated and approved in accordance with DODI 1322.28, Realistic Military Training off of Federal Property.

What are all local laws and ordinance referred to here?

Does any of this Urban Combat military invasion of public space, property and privacy violate the Idaho Constitution or the U. S. Constitution?

AF Response: The proposed Urban CAS training will operate in accordance with all local traffic laws, will not violate private space or property, and will behave in a manner typical of the average citizen. JTAC will adhere to parameters within the Draft EA.

The military DOD IM policy referred to in the DOPAA is found here.

<http://www.esd.whs.mil/Directives/issuances/dodi/>

www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/132228p.pdf

The DODI Applicability section states that it applies to: “ ...DoD forces (including general purpose forces (GPF) and special operations forces (SOF)) training off federal property in the United States or its territories

...”. So does that mean if the Urban Combat is taking place in the parking lot of the Federal Building, the BLM office, a USDA research lab, etc. – various DOD IM notification and other policies do not apply?

There appear to be many exceptions where the DOD IM “coordination”, “notification” with authorities and other provisions appear to be not required. This list of exceptions is at DOD IM p. 2 and 3, which states: *b. Does **not** apply to”.*

It appears that state lands or properties and private facilities (potentially spaces in buildings in the downtown Urban Canyons of Boise and in urban areas in general) where it appears this directive would not apply:

DOD IM (1) Training at private, commercial, State, or local facilities that have been specifically developed, established, or operated for the purpose of training such as that which will occur during the proposed training event.

Since nearly all buildings in Urban Canyons are privately owned, this activity could take place with unwitting customers, neighbors, residents, passersby and civilians in general being exposed to, feeling threatened, being captured on video, and otherwise impacted by the AF.

AF Response: JTAC will operator as defined in the proposed Urban CAS EA. They will not enter buildings or be located on buildings. **Section 2.1.4** describes the ground operational activities that would be conducted as part of the proposed training.

We are also very concerned about potential state and city facilities including those in the heart of Boise– as the same could apply there. The state of Idaho has not shown it listens to, or cares about, civilian exposure to potentially harmful military activity. In fact, the State has gone to extreme lengths to lobby for, and try to attract, noxiously loud F-35 war planes to Boise. These planes will harm residents health, rive people from their homes, cause plummeting home values, make it so children can not play outside at home or school, expose Boise airport users form around the world to harmful noise, etc.

See <https://boiseguardian.com/2017/01/22/otter-joins-bieter-using-citizen-money-to-lobby-for-f-35-at-gowen/>

“With unlimited resources in the form of citizen’s tax dollars at their disposal, the establishment politicians have nothing to fear from those who oppose noisy fighters over Boise.

Betsy Russell wrote last week in her SPOKESMAN REVIEW blog that Otter asked for \$100,000 in citizen money to lobby for the F-35 which is roundly opposed by residents of the Boise Bench, especially near the airport.

Russell wrote, “Otter added a \$100,000 supplemental appropriation request for the state Department of Commerce to promote and lobby for the recruitment of an F-35 mission and other future missions at Gowen Field, as the current A-10 mission winds down.” The money will come out of the Dept. of Commerce budget ...”.

The state of Idaho subsequently got the funds, and used it for pro-F-35 lobbyism and boosterism. This bodes ill for the State being concerned about civilians being exposed to, or caught up in the midst of, the War Game proposal. Similarly, Boise Mayor Bieter has gone to great lengths to promote F-35s ignoring health, safety and property concerns of Boise residents.

AF Response: Thank you for your comment

DOD IM (2) *Individual education or training activities at non-DoD academic institutions, including field activities within their curriculum.*

Does this mean a BSU ROTC group could form the basis for an exception? Please explain.

AF Response: Question falls outside the scope of this NEPA analysis.

DOD IM (3) *National Guard training activities while training pursuant to Title 32, United States Code (U.S.C.) (Reference (e)).*

Does this mean the proposed Urban Combat activity could be shoe-horned in, under cover of a National Guard exercise or other activity? Could the military use an activity taking place at the OTA or Gowen Field as an excuse to conduct this? Has Urban CAS Training already been taking place in the proposed project War Game area using this or other loopholes?

AF Response: The proposed Urban CAS training is for F-15 and F-15SGs based at MHAFB. MHAFB complies with the AF EIAP.

DOD IM (4) *Unmanned aircraft system (UAS) operations in accordance with Reference (d) with the pilot or controller of the UAS off federal property but independent of other ground maneuver or targeting activities.*

Does the Air Force foresee or plan to use drones in association with any of the Urban CAS training/War Games of this proposal in any way – either in the air or on the ground? If so, where and how? If so, how will this use impact people (annoying drone noise close to the ground, overflights over private property, etc.), startling animals (including wild animals which often have a strong negative reaction to drones). Example: Eagles and other birds of prey attack drones. There are nesting peregrine falcons in Boise’s “Urban Canyons”. Bighorn sheep and antelope are spooked and startled by them. What potential dangers are there? We just read of a drone crashing in Arizonan and starting a wild land fire. Note that War Planes will soon not have pilots, as Technology replaces humans. This increases risks.

AF Response: The proposed Urban CAS training is for the F-15s and F-15SGs based at MHAFB. The use of drones are not being proposed in this training.

DOD IM (5) *Aviation forces (not in conjunction with ground participants located off federal property) operating in accordance with Reference (d) ...* WHAT does this mean? This must be explained.

DOD IM (8) *Transit operations between federal property and training sites conducted in accordance with prevailing local, State, and federal law where no unusual maneuvering, tactics, techniques, or procedures are evident to the public.*

What is by “unusual” maneuvering? Or by tactics, techniques or procedures? Please provide a detailed description, and solid information on the sideboards of all of these terms and what they mean in a real world situation during War Games. Many Boise residents find it highly “unusual” for the military to be seeking to impose Urban Combat activity in and overtop of the city, for example.

There are many significant risks that we are identifying and raising in these comments, and we believe many of these are not able to be effectively mitigated: “b. By its nature, training off federal property, particularly in private or commercial urban settings, raises unique legal, policy, public affairs (PA), media, safety, and coordination issues that must be considered as part of the planning, approval, and notification process. Comprehensive and

effective risk identification and mitigation is instrumental to safe conduct of RMT and limiting the associated administrative burden”.

ALSO: c. *To accommodate military training needs and the unique interests and concerns of civilians and the media in the area of training activities off federal property, it is necessary to establish uniform planning, risk assessment, and approval guidelines for the conduct of such training.*

AF Response: The proposed training would be conducted in accordance with federal, state, local, and DOD regulations.

The document further states:

It is DoD policy to:

a. Use training environments off federal property when required once they have been properly coordinated with local (e.g., civil, tribal, and private) authorities and when the requirements of this instruction have been met.

BUT didn't the DOD IM just state under applicability that if the training involves state sites, areas specifically for the purpose, private property, that such coordination with local authorities did not apply???

AF Response: The proposed training would be conducted in accordance with federal, state, local, and DOD regulations.

Under the DOD IM, the AF is also to “*minimize disruption to civilians*”. Imposing an unprecedented War Game Range in the air and on the ground affecting a million people is not “minimizing disturbance”.

The DOD IM states under General Procedures and Risk Assessment: “*c. Risk assessment factors that I must be included in the assessment are:*

(1)Exposure and interaction with civilian population (e.g., physical presence and activity, noise levels, radio frequency interference).

ALL of this noise etc. and much more - such as high power radar use and other devices -must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses, and for all lands and civilian populations impacted by the Urban Combat footprint in any way. For example, will this type of radar and imaging be used –spying inside people’s pickups, house windows, etc. as the “War Games” are played?

AF Response: Aircrews use VHF (30-300 megahertz) and UHF (300mg-3gigahertz) radio frequencies. VHF/UHF are standard frequencies are used world-wide. The frequencies have been set aside by the FCC for aviation use. There are no negative effects associated with these standard frequencies. The F-15E only utilizes VHF on the 108-137 MHz band and on UHF in the 225-400 MHz band. These are the frequencies actually allocated to aviation by the Federal Communications Commission.

The AN/APY-7 radar can operate in wide area surveillance, ground moving target indicator (GMTI), fixed target indicator (FTI) target classification, and synthetic aperture radar (SAR) modes.

To pick up moving targets, the Doppler radar looks at the Doppler frequency shift of the returned signal. It can look from a long range, which the military refers to as a high standoff capability. The antenna can be tilted to either side of the aircraft for a 120-degree field of view covering nearly 50,000 km² (19,305 mile²) and can simultaneously track 600 targets at more than 250 km (152 miles). The GMTI modes cannot pick up objects that are too small, insufficiently dense, or stationary. Data processing allows the APY-7 to differentiate between

armored vehicles (tracked tanks) and trucks, allowing targeting personnel to better select the appropriate ordnance for various targets.

The system's SAR modes can produce images of stationary objects. Objects with many angles (for example, the interior of a pick-up bed) will give a much better radar signature, or specular return. In addition to being able to detect, locate and track large numbers of ground vehicles, the radar has a limited capability to detect helicopters, rotating antennas and low, slow-moving fixed-wing aircraft.

See: https://en.wikipedia.org/wiki/Northrop_Grumman_E-8_Joint_STARS

What types of radar will be in use by Cowboy Control or any other AF entity? The EA lists some areas with radar sites, but does not describe the types of radar that may possibly be used.

AF Response: Sections 2.1 through 2.1.6 describe the air and ground operational activities, including use of equipment that would be used for the Proposed Action.

(2) *Nature of operations (e.g., live fire, aviation, close quarter battle training [are CAS ground people/JTAC included in this?], day or night operations, tactics, techniques, and procedures).*

All of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife area and business, and for all lands and civilian populations impacted by the Urban Combat footprint in any way

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3), the proposed training would not result in significant impacts on resources.

(3) *Sensitivity of the terrain and included facilities (e.g., environmental, schools, hospitals, nuclear installations).*

All of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way. There are schools (public and private), nursing homes, hospitals, assisted living and other facilities including myriad work places, and zoos and vet clinics. There are also many agricultural facilities in the area to be overflown and it is very unclear how wide-ranging ground personnel operations will be. There are businesses that use harmful and dangerous substances where explosions, gas releases, or other things that may take place in the event of a plane crash pose a serious hazard. There are many types wildlife habitat and natural areas, too. ALL of these sites must be identified, mapped and avoidance distances (if any) by both ground and air crews laid out.

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3), the proposed training would not result in significant impacts on resources.

(4) *Terms of use of the objective facility (e.g., liability, clean up, and repair)*

All of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources.

(5) Nature of DoD presence (e.g., weaponry, vehicles, uniforms, movements).

All of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife area, business and for all lands and civilian populations impacted by the War Game footprint in any way.

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources.

(6) Presence, nature, and impact of fixed and rotary wing aircraft operations including unmanned aerial systems.

All of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources.

(7) Presence, interaction, and applied capabilities of non-DoD agencies (e.g., law enforcement, Department of Energy, Department of Justice).

All of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the Urban Combat activity footprint in any way.

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources.

What does the Department of Justice have to do with this? Does the AF plan to use buildings where federal workers are housed? If so, will the workers be informed? Will this also involve ICE or HHS?

AF Response: JTAC will operator as defined in the proposed Urban CAS EA. They will not enter buildings or be located on buildings. **Section 2.1.4** describes the ground operational activities that would be conducted as part of the Proposed Action.

(8) Degree of local, State, and federal political and public interest.

There is an ever-growing high degree of public concern and interest in this proposal, now that Idaho citizens have gotten the word out about it.

This is an unprecedented Range expansion adversely impacting almost a million people. The AF's 2016 Convoy Training EA admitted urban CAS over civilians was very controversial. See Attached letter.

(9) Nature of PA activities (active or passive) and presence.

What does this mean? Define "PA". All of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the War Game footprint in any way.

AF Response: The proposed training would be conducted in accordance with federal, state, local, and DOD regulations. Analysis for this EA was conducted in accordance with NEPA and the USAF EIAP.

(10) Availability and response time for DoD and non-DoD emergency services.

All of this must be analyzed in extensive site-specific detail for every city and town and rural and recreational/wildlife areas and businesses and for all lands and civilian populations impacted by the Urban Combat footprint in any way.

AF Response: A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources.

What happens to a city block or neighborhood if an F-15 crashes? Will the area be evacuated? What toxic substances will people potentially be exposed to? The EA fails to describe the toxic materials that the public could be exposed to. What happens to someone if the wrong laser or laser setting or other harmful device injures a person in any way?

AF Response: Existing emergency services in the region are available and in place for any aircraft incident (i.e., civilian or military).

The DOD IM also states:

Appropriate real property agreements for each training site will be executed with private property owners or government property managers.

(1) Agreements will address liability and conditions of usage of property. Property owners will be informed of the nature of the training, including written notification of activities involving training pyrotechnics, live or simulated ammunition, frequency band use, aircraft or UAS, when (day or night) training operations will be conducted, and whether any population nuisance factors (e.g., noise, smells, radio frequency interference) are anticipated.

Noise, radio frequency, radar and potential harmful effects, lasers and other devices and potential harmful effects, vehicles and vehicle accidents of disguised ground forces, lurking disguised ground forces startling/scaring civilians, civilians being involuntary 'chaos' in War Games and images of them (or their property, animals, children) video-streamed for military purposes. air pollution from planes and vehicles, blue skies turned white and gloomy with military plane contrails – all are a concern and may impact the civilian population. All must be analyzed in great detail. Further, please do not average sound over long periods of time in any noise analysis– what is the SEL and other real noise levels that will be encountered by citizens?

AF Response: F-15s do not create contrails at the altitude proposed in the Draft EA. Also, a full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the Draft EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources.

(2) Prior to document approval and signature, real property agreements must be reviewed by the command legal office for legal sufficiency.

(3) Copies of the signed agreements must be provided, if requested, to the senior local civilian officials responsible for the affected civilian environment, and if requested, to State and federal authorities. For copies of an agreement with private landowners requested by civil authorities, information considered private may be redacted by the component legal representative at the request of the land owner.

Are there any of these at present in the targeted area? Will all these agreements be posted on-line and be public knowledge so civilians can avoid use or patronage of the affected private properties so as not to expose themselves to ground War Games? Will **WARNING Military Training and Devices! Urban Combat in Progress!** signs be posted on buildings sites/facilities/locales to be used for the War Game training –or those areas covered by the “MOAs” referenced below? We request that this be required. We request this be mandatory. Notices should also be posted in papers, and the Air Force should maintain a list of all agreements and sites used for War Games at the MHAFB Website.

AF Response: There are no real property agreements associated with the proposed Urban CAS training.

RMT events that are recurring under the same general concept of operations (CONOPS) at the same location may be based on a documented CONOPS and a memorandum of agreement (MOA) with the appropriate authorizing civilian officials or a land use agreement with the property owner(s). The terms of the MOA will comply with the requirements of this instruction and include planned dates of execution

Is the AF developing a MOA/MOU? This also references media. Will there be daily and nightly alerts so that visitors to Idaho urban areas are not unwillingly exposed to /caught up --- in these exercises? Will there be training warning signs posted at the Boise airport? At Freeway exits? Or by buildings where War Games are taking place? We request this be mandatory.

AF Response: There are no real property agreements associated with the proposed Urban CAS training.

The DOD IM defines a category III event:

“Category III, major risk. RMT events, including extremely high and high mitigated risk factors, conducted in urban environments including significant interaction with civilian population and events assessed to have a high probability of the occurrence of a significant incident that would result in personal injury to the public or disruption to civilian activity. Media attention would be rapid with national visibility.

What is a “significant incident”? Will CAS forces prowling around neighborhoods promoting calls to police be considered a ‘significant incident’?

AF Response: The proposed Urban CAS training will operate in accordance with all local traffic laws, will not violate private space or property, and will behave in a manner typical of the average citizen. JTAC will adhere to parameters within the Draft EA.

The MHAFB CAS Urban War Game proposal itself is a **Category III major risk proposal**. An EIS must be prepared.

AF Response: Mountain Home AFB followed the steps for analysis as prescribed by the National Environmental Policy Act to assess impacts that would result from implementing the proposed pilot proficiency training. Mountain Home AFB coordinated with regulators from the early planning stages, through public scoping, and through review of the EA to ensure awareness of the proposed training activities and the analysis approach. Because the proposed flight and ground operations would be limited in scope, and would be conducted as described in **Sections 2.1 through 2.1.6**, impacts on certain resources either would not occur or would not have greater than negligible impacts. Therefore, those resources were reasonably and justifiably excluded from the full analysis (see **Section 3**, pages 3-1 and 3-2). A full analysis was conducted on the remaining resource areas to determine the extent of impacts that could be anticipated from implementing the proposed training. As reflected in the Environmental Consequences discussions provided in the EA (**Sections 3.1.3, 3.2.3, 3.3.3, 3.4.3, 3.5.3, and 3.6.3**), the proposed training would not result in significant impacts on resources. Therefore, in accordance with NEPA, this EA concludes with a Finding of No Significant Impact, and development of an Environmental Impact Statement will not be required. **Appendix A**, page **A-1** lists the stakeholders and agencies with, which, Mountain Home AFB coordinated throughout the NEPA effort for this Proposed Action. All listed were provided access to the DOPAA during early planning and scoping, and the Draft EA/Draft FONSI during the public comment period. Any comments received can be found within Volume II of the EA.

What existing agreements are currently in place with local officials? None of these questions about this DOD IM and specifically how all of these concerns will be addressed have been adequately answered in the EA.

AF Response: The proposed training would be conducted in accordance with federal, state, local, and DOD regulations, as specified in the DODI 1322.28.

Detailed Air Pollution, Noise, Safety/Risk and other Analysis Is Required – More Concerns

The DOPAA states: *During a training operation, 2 (or a maximum of 4) aircraft would depart the installation, enter the CAS wheel outside of an urban area, enter the urban center airspace to conduct training (for a duration of 60 to 90 minutes), then returning to the installation. Thus, a training operation would involve 2 (or a maximum of 4) sorties.*

Some areas would get potentially overflown many times (Glenns Ferry for example). The AF has not revealed the travel paths that will be used it will take to all of the Nine Cities and the 15 Nm area surrounding them, or how many repeated overflights many areas will suffer each day, including some of the smaller “cities” will suffer each day.

A training event may involve day or a combination of day-night training operations. Day training would occur between the hours of 7 a.m. and 10 p.m. Night training would occur between the hours of 10 p.m. and 7 a.m.

This is outrageous – the AF intends to disrupt people’s peace, subject the population to incessant overflights and crews roaming neighborhoods at night, and even defines “night” as starting at 10 pm. Tell that to parents of small children. Disrupted sleep leads to many serious health issues.

The EA states: *...160 training events and 400 training operations would occur annually in any one of the nine urban centers) was used to determine the maximum potential level of impacts under the Proposed Action. However, actual training levels would vary between the projected and surge levels of training events for each urban center in its respective size category (see Table 2-5).*

This means that at least 160 days a year, weekends, holidays included, Boise and other cities’ residents and much of the civilian population of southern Idaho will be subjected to this incessant noise additional air pollution sky in non-attainment or close to non-attainment airsheds including during times when conditions are really bad. This activity will also be marring the skies - as contrails that result in cloudy conditions result on what otherwise would be a bright sunny day, etc.

AF Response: **Section 3.2.3.1** of the Draft EA details the air quality modeling analysis conducted to assess emissions levels anticipated from the proposed training activities. The Air Force's Air Conformity Applicability Model was used to estimate the total direct and indirect emissions from the Proposed Action Alternative, which

have been compared to *de minimis* thresholds for air pollutants to determine the level of impacts. Results of the analysis indicated that air emissions from the proposed flight operations would be below the *de minimis* threshold of 100 tons per year of each pollutant in all areas; therefore, impacts would be minor.

A current detailed baseline of the existing air pollution from military and non-military sources across all affected lands, cities and airsheds must be provided. Then, the pollution caused by the War Game activity and transit must be assessed. What are the airsheds? How are they defined? What contribution does military aircraft pollution make to the pollution load Boise and other Idaho cities experience, including during inversions?

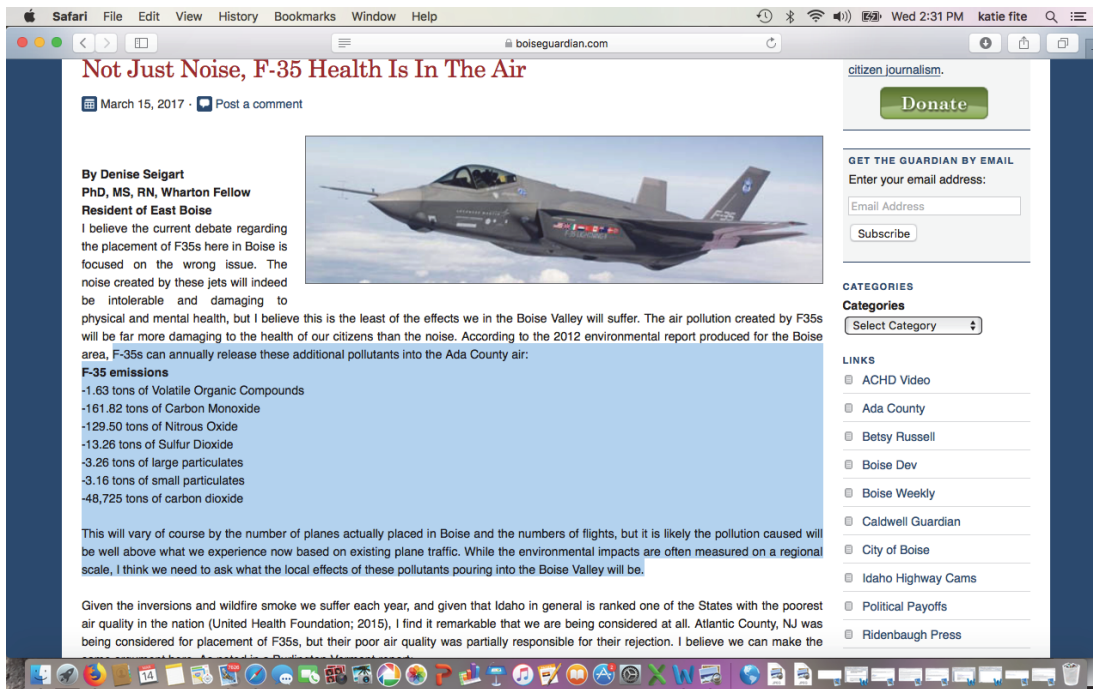
AF Response: Section 3.2.3.1 of the Draft EA details the air quality modeling analysis conducted to assess emissions levels anticipated from the proposed training activities. The Air Force's Air Conformity Applicability Model was used to estimate the total direct and indirect emissions from the Proposed Action Alternative, which have been compared to *de minimis* thresholds for air pollutants to determine the level of impacts. Results of the analysis indicated that air emissions from the proposed flight operations would be below the *de minimis* threshold of 100 tons per year of each pollutant in all areas; therefore, impacts would be minor.

Detailed analysis of the pollution from the overflights in and around the CAS wheel and in transit to MHAFB must be provided. How will the impacts vary – for example pollution stagnate and stay in place during inversions --- or under other varying weather conditions?

AF Response: Section 3.2.3.1 of the Draft EA details the air quality modeling analysis conducted to assess emissions levels anticipated from the proposed training activities. The Air Force's Air Conformity Applicability Model was used to estimate the total direct and indirect emissions from the Proposed Action Alternative, which have been compared to *de minimis* thresholds for air pollutants to determine the level of impacts. Results of the analysis indicated that air emissions from the proposed flight operations would be below the *de minimis* threshold of 100 tons per year of each pollutant in all areas; therefore, impacts would be minor.

How might these levels change under various foreseeable different war plane type scenarios (such as the F-35). Please carefully consider the information in this article, as it is likely F-15s will be replaced by F-35s, and/or the IDANG may acquire F-35s adding to the air pollution in the Boise airshed, as will F-15E War Games including cumulatively:

<https://boiseguardian.com/2017/03/15/not-just-noise-f-35-health-is-in-the-air/>



WHAT will these emissions levels - VOCs, CO₂, etc. be for F-15s? The *Boise Guardian* article also describes:

Given the inversions and wildfire smoke we suffer each year, and given that Idaho in general is ranked one of the States with the poorest air quality in the nation (United Health Foundation; 2015).

AND the Guardian continues: "Air pollution complex mixture exposures.... of children and teens in natural settings are characterized by early dysregulated systemic, brain, and intrathecal inflammation; production of potent vasoconstrictors and autoantibodies to key neural proteins; and perturbations in the integrity of the neurovascular unit and the nasal, olfactory, gastrointestinal, and alveolar-capillary barriers. In highly exposed children, the accumulation of misfolded hyperphosphorylated τ , α -synuclein, and β -amyloid coincides with the anatomical distribution observed in the early stages of both Alzheimer and Parkinson diseases. (Calderon-Garciduenas, Torres-Jardon, 2015)

How much fuel (gallons) will be burned annually with F-15s in this activity? With F-35s or other foreseeable planes using the Range if F-15s are replaced with F-35s? Will there be in-air refueling and chance of spills?

AF Response: Sections 2.1 through 2.1.6 describe the air operational activities associated with the Proposed Action. Mountain Home AFB will maintain F-15E and F-15SG aircraft into the foreseeable future.

Please also establish a baseline of contrail pollution of skies across the project area, and over each city. Contrails coalesce to turn blue sky days gray-white. Gray-white skies affects people's moods, temperature, efficiency of solar energy generation, etc. How much will War Game activity generated contrails marring of skies and pollution increase with the War Games intensive activity? What is the current baseline –under all weather conditions? How much less sun and blue sky will each area and the total area receive? How will that impact people's health and state of mind?

AF Response: Impacts analysis from conducting the Proposed Action is provided in Section 3 of the EA.

See: <http://www.pbs.org/wgbh/nova/space/contrail-effect.html>

Whether contrails cause a net cooling or a net warming, even whether their effect is something to worry about within the greater general concern about climate change, remains unclear. But with air traffic expected to

double or even triple by 2050, leading contrail researchers say the influence of these artificial clouds cannot be ignored.

OUT OF THE BLUE

A contrail will form behind a jet if, as exhaust gases cool and mix with surrounding air, the humidity is high enough and the temperature low enough for liquid water to condense ...

A LINGERING CONCERN

If conditions are right, newly formed contrails will begin feeding off surrounding water vapor. Like vaporous cancers, they start growing and spreading. In time, they can expand horizontally to such an extent that they become indistinguishable from cirrus clouds, those thin, diaphanous sheets often seen way up high. These artificial cirrus clouds can last for many hours, and the amount of sky they end up covering can be astonishing. One study showed that contrails from just six aircraft expanded to shroud some 7,700 square miles.

See also: <https://phys.org/news/2011-03-airplane-contrails-worse-co2-emissions.html>

In a recent study published in Nature Climate Change, Dr. Ulrike Burkhardt and Dr. Bernd Karcher from the Institute for Atmospheric Physics at the German Aerospace Centre show that the contrails created by airplanes are contributing more to global warming than all the CO₂ that has been caused by the entire 108 years of airplane flight.

AND: they have discovered that aviation contrails play a huge role in the impact on the climate and an even greater impact than that created by the CO₂ emissions produced. While the CO₂ emissions from airplanes account for around three percent of the annual CO₂ emissions from all fossil fuels and change the radiation by 28 milliwatts per square meter, the aviation contrails are responsible for a change of around 31 milliwatts per square meter. The only difference is that CO₂ has a longer life than that of the contrails, and can still continue to cause warming even hundreds of years down the road.

The researchers believe that while continuing to reduce CO₂ emissions in aviation, more work needs to be done to reduce contrails as well.

The concerns about War Plane activity contrails altering sunny conditions in the project area are not addressed.

How much closer will this perpetual War Game Range push Boise and the Treasure Valley to Air Quality non-attainment? How will this pollute the air of surrounding public wild lands, where the pollution may ultimately end up, as well? How will this affect quality of life, or the climate? Blah, gray skies affect people's mood and sense of well being.

AF Response: Air quality analysis is provided in Section 3.2 of the EA.

What is the current military air pollution level from all planes (including transients that make up a significant portion of the Boise airport military planes)? From commercial and all military planes?

AF Response: Air quality analysis is provided in Section 3.2 of the EA.

Won't some areas be overflowed time after time in transit – and so they will suffer larger pollution loads? Won't the Large and Medium cities suffer higher loads since there are fewer of them - and thus they will suffer more training?

AF Response: Air quality analysis is provided in Section 3.2 of the EA.

How about civilian aircraft operate in the 10,000 to 18,000 ft area? Or below it in line with laser use? The Boise airport recently announced that use had increased. How much more pollution can the airshed withstand and not be pushed into non-attainment – including as the population increases? The military should be looking to DECREASE its pollution in this airshed, and reduce its climate change footprint (which also must be assessed

in detail here) rather than increase it.

AF Response: Air quality analysis is provided in **Section 3.2** of the EA.

Airspace Discussion, FAA Role

The EA discussion of Airspace and of the FAA role in regulating it is quite confusing.

In the discussion of MTRs, or other routes used by the planes --- what are the flight levels? What are other military sources of contrails and pollution?

AF Response: Airspace management analysis is provided in **Section 3.3** of the EA.

To what degree will overflights – for example, going back and forth to Boise or Burley from MHAFB– occur over other cities/towns - thus significantly increasing disturbance, pollution, mental trauma, etc. to the often lower income citizens who inhabit these areas? This Urban Combat will take place over many lower income communities in Idaho- so aspects of the War Game proposal may be a matter of economic justice. Just look at the nightmare of overlapping CAS flight circles near Glenns Ferry, for example. Further, will Urban area training disproportionately impact low income areas of cities? The EA contains no valid socioeconomic analysis.

AF Response: Discussion on airspace management is provided in **Section 3.3** of the EA.

Note that F-15 pilots have had oxygen deprivation issues – increasing the likelihood of a crash or mishap. <http://www.businessinsider.com/air-force-picks-general-investigate-oxygen-loss-hypoxia-incidents-2018-1>

A physiological event happens when pilots experience symptoms that can be caused by a number of factors, like hypoxia, that can cause dizziness, confusion, and impair a pilot's ability to fly.

These incidents have not been limited to those aircraft. Pilots of F-22 Raptors, F-16 Fighting Falcons, and F-15 Eagles have reported hypoxia-like incidents in recent years. An F-22 pilot was killed in a 2010 incident in which his oxygen system cut off; the cause for the malfunction has not been found.

Nor is the problem limited to the Air Force — Navy pilots in the T-45 Goshawk training aircraft, F/A-18 Hornets, Super Hornets, and EA-18G Growlers have also experienced hypoxia-like incidents at an increased rate over the past several years. Hypoxia-like symptoms have been linked to the deaths of four Navy F/A-18 pilots.

What toxic, dangerous or hazardous materials are there in F-15s, and other military planes that may potentially or foreseeably be used this in the future – including F-35s? Aren't the stealth coating or other aircraft materials carcinogenic?

AF Response: The proposed Urban CAS training is for MHAFB F-15E and F-15SG aircraft as specified in the EA.

The EA states:

At least 75 percent (or 120) of the annual training events would involve day training operations. During day training, aircrews and ground support teams would conduct two training operations (including one between 7 a.m. and 12 p.m., and the other between 2 p.m. and 10 p.m.) per 24-hour period. On these days, an estimated maximum of 3 hours of dedicated flight activities over an urban center would be expected. At least 70 percent of the anticipated total number of day training operations would involve 2 aircraft flying in the CAS wheel and

operating over an urban center. At least 30 percent of the total number of day training operations would involve 4 aircraft to incorporate proficiency training in operational hand-offs. Thus, a total of 240 day training operations, comprised of 624 sorties could be expected per year.

At least 10 percent (or 16) up to a surge of 25 percent (or 40) of the anticipated annual training events would involve two day training and two night training operations within the 24-hour period ...

At least 75 percent ... would involve day training operations. During day training, aircrews and ground support teams would conduct two training operations (including one between 7 a.m. and 12 p.m., and the other between 2 p.m. and 10 p.m.) per 24-hour period. On these days, an estimated maximum of 3 hours of dedicated flight activities over an urban center would be expected. At least 70 percent of the anticipated total number of day training operations would involve 2 aircraft flying in the CAS wheel and operating over an urban center. At least 30 percent of the total number of day training operations would involve 4 aircraft to incorporate proficiency training in operational hand-offs. Thus, a total of 390 day training operations, comprised of 1,014 sorties (4,056 flight operations) could be expected per year. [SEP]

Why does the Air Force consider 9:59 pm to be “daytime”? Many people with young children want them to sleep earlier than this. Plus people work all kinds of shifts, and must sleep in the day – this is especially true of lower wage jobs, hospital workers and others. Day time use will also interrupt sleep, cause health problems and make people less alert in their work. The DOPAA stated:

AF Response: Noise modeling defines day time and night time hours.

The Air Force claims flights are significantly reduced from the 260 number. But EA Table 2.6 shows almost as many flights with the “surge” level. See EA Table 2.6. “Annual Envelope of Day and Day-Night Training Operations at each Urban Center”.

AF Response: Section 2.1.5 describes the proposed levels of operations.

Day Training Operations 1, 2, 3				
Urban Area	Total Day Training Operations		Total Day Training Sorties	
	Projected Level	Surge Level	Projected Level	Surge Level
Large Urban Centers				
Boise	100	240	234	624
Medium Urban Centers				
Mountain Home	38	240	96	624
Burley	19	240	49	624
Twin Falls	19	240	49	624
Small Urban Centers				
Grandview	15	240	39	624
Bruneau	15	240	39	624
Glenns Ferry	15	240	39	624
Hammett	15	240	39	624
Mountain Home AFB	15	240	39	624
Day-Night Training Operations 1, 4				
Urban Area	Total Day-Night Training Operations		Total Day-Night Training Sorties	
	Projected Level	Surge Level	Projected Level	Surge Level
Large Urban Centers				
Boise	60	160	126	336
Medium Urban Centers				
Mountain Home	25	160	53	336
Burley	13	160	26	336
Twin Falls	13	160	26	336
Small Urban Centers				
Grandview	10	160	21	336
Bruneau	10	160	21	336
Glenns Ferry	10	160	21	336

Much more detailed information must be provided on the real baseline number of CAS flights, operations, activities, etc. currently being conducted in Owyhee County. A full explanation must be provided of how such

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different numbers in flights were used as the current baseline in Scoping/DOPAA vs. in the EA. The numbers are puzzling.

These flights are an outrageous military intrusion into the lives, health, safety and private property and public space use of Idaho citizens.

What will be the SEL noise citizens will be exposed to at 10,000 ft.? What might cause planes to fly lower than 10,000 ft. Will any of these planes be landing or originating from the Boise Airport, for example if experiencing mechanical difficulties?

AF Response: Under the Urban CAS training proposal, aircraft will not fly below 10K'. Aircraft will not land or take off from the Boise/Gowen airport. Take off/landing will only occur from/at MHAFB.

The Air Force has stated: *Operations would be conducted in some combination of large, medium, and small urban centers.* This means Boise, and the densest Idaho population, would bear the brunt of the War Combat. This maximizes the disruption of the largest number of citizens, and places them most in danger.

AF Response: Section 2.1.5 describes the proposed operating levels at the identified urban centers.

The EA states:

Concurrent training operations at more than one urban center would be expected for 20 to 30 percent of the proposed surge level training days (i.e., 160) annually across the selected urban centers.

Does concurrent mean occurring at the exact same time or occurring at some point within the 24 hour period?

AF Response: Concurrent, for the purposes of the proposed training, would mean at the same time or within the same relative timeframe.

Noise Levels

There are a large number of concerns related to noise information and analysis of direct, indirect and cumulative effects in the EA, and also impacts of potential changes in aircraft activity over time, as well. The EA states:

Under the conservative analysis, individual high-altitude overflights would be audible, but distant, to individuals who are outdoors. Overflights would not interfere with communication or awaken individuals from sleep.

What is the basis for the claim that noise would not interfere with sleep? Many people sleep with windows open for several months of the year.

AF Response: Noise analysis is provided in Section 3.1 of the EA.

How did the EA end up using the noisiest sites in Boise as establishing background noise – airport, I-84, etc.? See EA Table 3.2. What is the noise in a Foothills neighborhood, for example?

AF Response: Noise analysis is provided in Section 3.1 of the EA.

What is the scientific basis for the Air Force claiming that anything below 65 decibels is a “low” noise level?

AF Response: Noise analysis is provided in **Section 3.1** of the EA.

We are very concerned at the EA's use of the AF's NOISEMAP. Independent outside noise analysis must be conducted. What are all assumptions made in the NOISEMAP model?

AF Response: Noise analysis is provided in **Section 3.1** of the EA.

Don't noise levels vary greatly from place to place in larger Urban Centers? Much more detailed neighborhood/local area analysis must take place.

It appears the average day-night noise level, DNL, is meaningless for understanding how flight events will actually impact people, domestic animals and wild animals including sensitive species.

Please explain what this possibly means: ... *the overall level of noise under all training scenarios would be below the existing background levels and would blend naturally with the existing soundscapes in these areas ...* ”.

AF Response: Noise analysis is provided in **Section 3.1** of the EA.

This noise measurement ignores the effects of low frequency sounds.

The EA states: *Individual Overflights. Although operational noise levels would be too low to result in incompatibility with existing land uses, noise from individual F-15E and F-15SG overflights would generate distinct, yet distant, acoustical events. Tables 3-5 and 3-6 list the SEL and L_{max} for high-altitude F-15E and F-15SG overflights under cruising conditions within an altitude range of 10,000 up to 20,000 ft AGL.*

How much louder would the noise be louder if the plane were ascending or descending, accelerating or maneuvering? What would those levels be?

AF Response: Noise analysis is provided in **Section 3.1** of the EA.

Sound Exposure Level is the constant sound level that has the same amount of energy in one second as the original noise event.

Table 3.5 and 3.6 SEL and other noise levels appear to show that people will indeed hear the noise, and it may disturb and disrupt work, sleep and recreation. The EA ignores the fact that many people in southern Idaho spend a lot of time outdoors. Having constantly growling annoying military planes overhead is highly detrimental to a peaceful outdoor experience – whether in a natural area or in a backyard. This project will degrade quality of life for the affected population.

The EA states: *It is possible that a range of aircraft, not included in this proposed action and not addressed in this EA, could conduct similar high-altitude Urban CAS operations with less than significant noise impacts on the underlying communities. However, if aircraft other than F-15E or F-15SG are flown during Urban CAS training in the future, either near Mountain Home AFB or over other urban centers, subsequent NEPA analysis and comprehensive noise modeling would be required to specifically address potential noise impacts of those activities. For reference purposes, noise levels for the F-15E, F-15SG, and other aircraft are provided in Appendix B.*

Much more detailed information on direct indirect and cumulative effects of foreseeable aircraft and activities must be provided, and analysis must examine all affected elements of the environment.

AF Response: Cumulative impacts analysis is provided in **Section 4**.

More JTAC Concerns

FFOR would consist of up to five civilian type vehicles with up to three passengers per operating vehicle. FFORs would direct aircraft using a variety of tactical communication devices (e.g., frequency modulation radio, very high frequency radio, ultra high frequency, and satellite communication radios). Additionally, FFOR may use data link systems to receive or transmit analog or digital information to the aircrew. Each of these devices would be operated on pre- approved, dedicated military frequencies. OPFOR would use up to five civilian type vehicles in various convoy scenarios with up to four passengers per vehicle. [SEP]

Just what information will be transmitted? Will it include video of people's homes, cars, property, the people themselves, their animals, etc.? What will happen to any video and any data that may have personal information of a sort, or images of citizens or their property?

AF Response: Section 2.1 through 2.1.6 describes the operational activities, including use of equipment, that would be used for the proposed training.

We are concerned because in the past Air Force overflights in Owyhee County have essentially been used to inform authorities of civilian activities taking place. We can envision false alarms, intrusions into people's private lives, etc. from training activity that also may be akin to a form of surveillance.

The EA states: *Prior to mission training operations, F-15E aircrews would maintain flight in a circular path, known as a CAS wheel, in the airspace that overlies the farther outskirts of town or the outermost edge of the 15-NM radius from the urban center point. Two, or a maximum of four, aircraft would fly in the CAS wheel at any one time.*

This will seriously impact public lands and wildlife inhabiting them as well as many rural residents and their pets and animals. In some cases – the 15 NM will put the planes right over one of the Nine Cities – or other Idaho towns which the AF does not clearly reveal will also be impacted because they are within the 15NM air and ground activity footprint.

It's as if someone thought they were developing a video game with this War Game proposal - that in no way reflects the real world impacts, and the noise, disturbance threats to humans and animals, or disturbance to public lands and wildlife that this proposal will cause.

*The aircraft would separate from the CAS wheel, fly toward the urban center point, and be guided with instrumentation and communication to identify, track, and simulate neutralization of the OPFOR. **The two aircraft would fly throughout the airspace overlying the city** in a wedge formation where the lead aircraft would be positioned at a lower altitude and ahead of the second aircraft. The second aircraft serves to cover the lead aircraft from a higher altitude and reasonable distance behind, where visibility surrounding the first aircraft can be maintained. Flight tracking of OPFOR would continue until the point of simulated weapons fire. Upon mission completion, the aircraft would return to the installation.*

Does this mean that the center of Urban Areas, i.e. the places with the highest population densities and most civilians to be exposed, annoyed and harmed - would most suffer this disturbance the most? Please provide an address that is used as the center of an Urban Area. Please provide detailed information on what specific areas of each city and the surrounding public and private lands that will receive the most and/or more intensive overflight activity, and the most and/or more intensive JTAC activity. We again stress that if the AF actually intends to avoid schools, churches, hospitals, some natural areas- it would appear difficult or impossible to conduct Urban War Combat in southern Idaho outside of military withdrawn lands.

AF Response: Ground operational activities would be conducted as described in Section 2.1.4 of the EA.

The DOPAA had also mentioned fake Bombing. What does the fake Bombing entail? What devices would be used? Note a word search of the EA shows no mention of bombing. Has fake bombing been dropped, or is it just not mentioned, or included under the catch-all term “munitions”?

AF Response: As specified in Section 2.1.5 describes the mission operational activities that would be conducted as part of the proposed action including the simulated neutralization of the identified target.

The EA states under “Munitions” at EA 2.1.6:

All interactions between air and ground teams would be achieved through use of electronic equipment including tactical communication radios (e.g., frequency modulation, very high frequency, ultra high frequency, and satellite communication), navigational GPS for maintaining awareness of target locations, low-power, eye-safe infrared training lasers for marking targets, and computer simulation systems on board the aircraft.

Please provide detailed information and the exact specification of all the devices and activities here. What are the specific frequency ranges that the devices in the air and on the ground will be using? How might these high frequencies, and lasers, or other devices that may be used impact people, domestic animals, and wildlife? Aren't lasers used as wildlife deterrents? Are some animal species eyes more sensitive than humans, and likely to be damaged? Won't lasers used at night disturb wildlife? The EA refers the reader to Appendix E, which does not provide the reader with necessary explanatory information to understand the parameters and specifics of the lasers to be used, or their impacts on people and wild and domestic animals. This must be explained in layman's terms.

AF Response: Appendix E provides the Nominal Ocular Hazard Distances (NOHDs) for the particular equipment that would be used for the proposed training.

Is the Air Force Giving Itself an “Out” to Ignore Analysis of Many Aspects of the War Range – by Claiming they Were Previously Analyzed?

The DOPAA attempted to avoid substantive analysis of critical aspects of the three part War Range scheme. The DOPAA stated: *For this EA, the analysis of impacts on the human environment and natural resources assumes that the anticipated annual maximum number of Urban CAS proficiency training operations required by the 366 FW would be distributed to any one of the nine urban centers that meet the ... standards. Because Urban CAS training operations already occur on the installation at the maximum proposed operational tempo, and the negligible to minor impacts resulting from these operations have already been analyzed and addressed in accordance with NEPA, this EA will not address impacts on the installation or in the MHRC (Mountain Home AFB 2017).*

AF Response: Analysis of the Proposed Action was completed in accordance with NEPA and the USAF EIAP.

Now the Draft EA has indeed avoided any substantive analysis.

The DOPAA reference is: Mountain Home AFB. 2017. Final Environmental Assessment for Operational Changes and Range Improvements in the Mountain Home Range Complex. May 2017. This appears to be the 2016 MHAFFB Convoy EA. The Final EA was dated 2016. This has not been clarified adequately in the EA.

The DOPAA stated: *The MHRC does not have the required population, vertical development, or artificial lighting to adequately simulate a medium or large urban environment. In fact, the MHRC does not have any capability to simulate the dynamic environment of an urban community. Urban areas provide real-time considerations, much like deployed operations, to ensure the mission would be executed without involving noncombatants and minimizing collateral damage. Further, although the installation and MHRC do have limited vertical development, they do not adequately simulate the challenges presented by the urban canyons of*

medium and large urban centers that are created by buildings of varying shapes and sizes. This unique problem presents multiple challenges associated with finding and tracking points of interest. Lastly, different levels and types of lighting are difficult to simulate on the MHRC. To provide artificial lighting that would adequately simulate the medium or large urban environment on the MHRC would require development of building with lighting infrastructure on the existing gunnery ranges.

This entire DOPAA claim is shown to be false by the 2016 Convoy Training EA, for the MHAFB where the Air Force claimed it needed more tax dollars spent on Urban War CAS facilities on existing Ranges, and discussed “illumination” and other matters. .

Then how has the Air Force managed to proficiently train all these years? Plus the convoy Training EA talked about “illumination” on the existing ranges and other matters the AF complains about here. The Air Force uses all kinds of lighting right now – including hazardous fire causing White Phosphorus (used in War Crimes) at Saylor Creek. See Attached Convoy EA Excerpts showing lighting capability at SCR, and the Convoy EA discusses all kinds of “illumination” and its expansion.

AF Response: Section 1.3, pages 1-3 and 1-4 of the EA defines the existing proficiency training in Urban CAS on Mountain Home AFB. Section 2.1.5, page 2-2 of the document defines the ground support activities associated proposed action. Section 2.4 describes the operational and training inadequacies of continuing to train for Urban CAS within the installation’s airspaces.

Infrasound Concerns

Please provide detailed analysis of the Infrasound levels and impacts from the War Planes flying over Urban areas for prolonged periods of time.

AF Response: Noise analysis is provided in Section 3.1.

Infrasound travels FURTHER than higher frequency sounds. What will the infrasound levels be in the planes and devices used, and foreseeably used in the future, in the Urban War Combat Range?

AF Response: Noise analysis is provided in Section 3.1.

At the other end of the spectrum are very low-frequency sounds (below 20 Hz), known as infrasound. Elephants use infrasound for communication, making sounds too low for humans to hear. Because low frequency sounds travel farther than high frequency ones, infrasound is ideal for communicating over long distances.

<https://www.nps.gov/subjects/sound/understandingsound.htm>
<https://www.popsoci.com/technology/article/2012-11/acoustic-weapons-book-excerpt>

“Because infrasound can affect people's whole bodies, it has been under serious investigation by military and research organizations since the 1950s, largely the Navy and NASA, to figure out the effects of low-frequency vibration on people stuck on large, noisy ships with huge throbbing motors or on top of rockets launching into space”.

AND: “The commonality of infrasonic vibration, especially in the realm of heavy equipment operation, has led federal and international health and safety organizations to create guidelines to limit people's exposure to this type of infrasonic stimulus”.

https://ntp.niehs.nih.gov/ntp/htdocs/chem_background/exsumpdf/infrasound_508.pdf
What will the infrasound levels be that citizens could be exposed to?

Laser and other Devices and Complexity

We continue to be very concerned about the type of lasers and their use and potential for accidents. Types of lasers used may also change over time, as may who is using lasers (JTAC?). The potential adverse effects and risks to the public (residents in buildings, on the streets, in their yards, in cars, in planes under the lasers from War Planes, etc. must be fully examined.

AF Response: JTAC will not use lasers.

The effects of lasers in disrupting wildlife activity must also be examined. These concerns were not addressed by the Air Force. For example, the National Park Service Website cautions visitors to parks to LEAVE LASERS AT HOME. It states:

Spotlights/laser pointers – Spotlights and laser pointers can be disruptive to animals and are prohibited items in some parks.

Please also address all the other concerns we raised about lasers and types of lasers in Scoping comments, laser video-streaming invading citizen privacy, etc.

<https://www.nps.gov/subjects/watchingwildlife/gear.htm>

Wikipedia on Free Space/Lasers

https://en.wikipedia.org/wiki/Free-space_optical_communication

Useful distances[edit]

The reliability of FSO units has always been a problem for commercial telecommunications. Consistently, studies find too many dropped packets and signal errors over small ranges (400 to 500 meters). This is from both independent studies, such as in the Czech republic,^[10] as well as formal internal nationwide studies, such as one conducted by MRV FSO staff.^[11] Military based studies consistently produce longer estimates for reliability, projecting the maximum range for terrestrial links is of the order of 2 to 3 km (1.2 to 1.9 mi).^[12] All studies agree the stability and quality of the link is highly dependent on atmospheric factors such as rain, fog, dust and heat.

The DOPAA referred to considerable Urban War Game activity in inclement weather. How will this impact lasers and other devices (of all kinds) being used?

AF Response: Section 2.1.5 and 2.1.6 describe the use of lasers as part of the proposed operational activities.

Once the military gets the use of lasers in a Training Range – anything can happen with incremental changes over time, or accidental use of devices.

An on-line source describes lasers streaming video, and raises many other issues about laser use on the ground and in the air and radar.

What if civilians accidentally get “illuminated” by a laser (or become a “target of opportunity” as happens out on areas of the MHAFFB at times)– and don’t want to be? On-line sources describe lasers and use of radar which is not assessed:

Laser designators give the precise marking of ground-based or airborne targets especially for small-sized and well-defended targets. The principle of designation requires the target to be illuminated by the laser beam, either by ground forces or by a gunner on the fighter plane. The reflected light from the target is captured by

the host platform or weapon system that allows the automatic tracking of the signal to provide accurate target information to the aircraft, navigation or weapon aiming system ...

As compared to traditional RF radar, laser radar provides enhanced accuracy in range measurement, velocity and angular displacement. In addition, the material composition of the target can also be determined by measuring certain properties of the reflected light, such as Doppler shift. LIDAR is generally used for soft targets like chemical or gas detection whereas LADAR is used for hard targets.

They also describe:

With the upcoming trend of electronic warfare, military operations demand broadband capacity with the highest level of security. Nowadays, tactical operations are enabled with large volumes of ISR imagery and video data that are being transferred from sensing locations to battlefield grounds. Also, timely access to critical information delivered to soldiers in the battlefield can change the war game. For this reason, laser communication, also known as free space optics (FSO), is a good choice owing to its high carrier frequency, ultra-low latency and immunity towards EM radiation.

Besides LOS communication, NLOS EO laser communication utilizing UV radiation is also studied for military applications ... Despite the many benefits of laser communications, this technology has considerable limitations, that prevent it from being a direct replacement for conventional RF communication. The performance of laser links is very susceptible to varying weather conditions and it deteriorates during heavy fog, smog or high temperature circumstances. For this reason, military bodies around the world are looking at the laser communication as a technology to augment the existing RF-based system or keep it handy to provide assistance in case of jamming. Laser communication systems are generally designed for short-range point-to-point or multi-point configurations, where other communication networks are practically impossible to be installed.

AF Response: Lasers would be used as described in Sections 2.1.5 and 2.1.6 of the EA.

Please describe how Urban Combat activity is changed by cloudy, inclement weather conditions. Please explain what the purpose of that is, and what devices will be used and/or affected under these conditions.

AF Response: Lasers would be used as described in Sections 2.1.5 and 2.1.6 of the EA.

We also note this:

Another dimension where lasers can improve the military capability in future battlefield operations is its use as weather modifier. Since weather plays a dominant role in military operations, therefore, any ability to control it can bring a significant change in the war scenario. Lasers can be used as weather modifiers by using directed energy sources; they then provide enough energy to the localized region of the atmosphere to change its weather. High Frequency Active Auroral Research Program (HAARP) conducts various experiments, using electromagnetic frequencies to analyze the behavior of ionosphere, in order to enhance military communications and surveillance capabilities for defense purposes [106] ...

The bottom line is that all of the activities of this Urban War Combat proposal impacting nearly a million people, and the devices and their risks and potential for harm must be fully examined in an EIS if the Air Force pursues this unprecedented militarization of civilian space.

In 2016, MHAFB admitted CAS Urban War activity in Idaho cities is controversial, necessitating an EIS for this current proposal.

AF Response: The Environmental Assessment for Operational Changes and Range Improvements in the Mountain Home Range Complex, 17 Jul 2017 addressed JTAC training per JTAC requirements. These

requirements would be seen as controversial if proposed within local populations. Under the proposed Urban CAS training, JTAC operations are defined to meet MHAFB operators training requirements. JTAC training will continue on MHAFB managed lands.

Lack of Monitoring

How can the public monitor USAF's compliance with the promised mitigation measures, such as limiting the number of flights, the flying altitudes, the extent of ground operations, etc.? In fact, USAF disclosed at the scoping meetings that USAF had already been conducting urban combat training in Boise – apparently for years – in violation of environmental requirements.

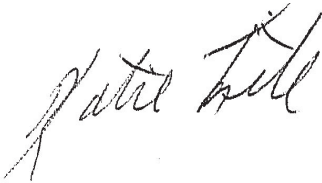
AF Response: The 366 Fighter Wing (FW) Range Operations Office will monitor air operations for EA compliance. The information can be requested through the 366 FW Public Affairs Office (208-828-6800).

Socioeconomic Impacts Unaddressed

The EA does not properly consider all socio-economic impacts. USAF does not address the psychological impacts on veterans, refugees, and other war survivors of simulated urban warfare and the activities mentioned above. The USAF does not address the psychological impacts on current service members of waging simulated urban warfare in American cities.

AF Response: Please see **Section 3, page 3-2** of the EA regarding socioeconomics.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Fite". The signature is written in a cursive, flowing style.

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738

From: Inna S. [REDACTED]
Sent: Friday, October 19, 2018 11:58 PM
To: 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>
Cc: Inna S. [REDACTED]; Katie Fite <katie@wildlandsdefense.org>; SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>; Mayor Bieter <mayor@cityofboise.org>
Subject: [Non-DoD Source] Public Comments against Urban CAS proposal in Idaho

I am really concerned to hear that the draft Environmental Assessment by the US MH AFB concluded that their proposed year around military training in and over Boise will have No Significant Impact on civilians living in this still peaceful city. I can understand that for the military people it may seem so. But I do not want my family to be involved in this type of constant military activity. Because it sends my children a message that it is Normal to be in the state of constant war. On average, America has been at war about 93% of its history. President Donald Trump largely grew his predecessor's conflicts in Afghanistan, Iraq, Syria, Yemen, Somalia, Libya, and Niger - which by the way are nowhere near the U.S. I think your URBAN CAS proposal is bringing these endless foreign wars back to U.S. soil in the form of a permanent training area over 9 major cities in Idaho. Next, the USAF Secretary will be asking the Congress for more funding, so you can fly endless CAS circles over our cities.

Besides shattering peace and destroying countries, the U.S. Department of Defense is known as the largest polluter in the world. When acting overseas the DoD obviously is not subject to NEPA. At home, DoD rigs NEPA processes by piecemealing the impacts, or declaring a FONSI "No Significant Impact" earlier at EA stage. And now Trump administration wants to gut NEPA. You can go ahead and claim that the environment itself is not significant, just as you claim that you training using civilians and cities as targets is not a big deal at all, because the military will not wear uniforms and will not be armed, so the civilians will not even notice the military activity.

I have to ask you what impact on civilians would the USAF consider to be significant, if not Environmental Impacts of military jet engine noise and fuel pollution? Would it have to be something as disruptive as carpet bombing the city? Because in this EA you are claiming that practicing targeted air strikes on our city by JTAC teams and F-15E planes year around including some at night time has no significant impact on a civilian city. If it has no significant impacts on residents, then it should be done at the best location for such activity, a real urban environment of Washington D.C. I am still awaiting your answer as to the names and rank of the people who originated the Urban CAS proposal for 9 Idaho cities, so far the document released to the public does not mention its authors. If this is such a great idea, they should be proud to sign their names on Urban CAS proposal.

I appreciate you withdrawing your flawed proposal to use my city as a permanent military training range for the MH AFB.

Inna Patrick
Boise, Idaho 83709

From: Rick Skinner [REDACTED]
Sent: Sunday, October 21, 2018 3:28 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Cc: Mayor@cityofboise.org; Carole Skinner [REDACTED]
Subject: [Non-DoD Source] Comment on Air Force Proposal for Urban Training Zone

Please see the attached letter of comment. Thank you.

Rick Skinner
Skinner Fawcett LLP

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October 20, 2018

Re: Establishment of Urban Close Air Support (CAS) Training Spaces

Dear Ms. Shaver,

Thank you for this opportunity to submit comments. I am opposed to the U.S. Air Force's proposal to establish a roughly 175-mile Urban Close Air Support (CAS) Air and Ground Training Zone in southern Idaho. This proposal would present a serious challenge to our quality of life here in Boise and the surrounding area, something we have all worked hard to create.

There are a wide variety of community based issues that would be raised if this proposal came to pass. I know that you are, or should be, aware of many of these, but to summarize:

The proposal involves U.S. and Singaporean pilots in F-15E and F-15SG aircraft respectively coordinating with teams of up to 35 troops on the ground. *Approximately one-third of the proposed operations will be conducted by Singaporean military pilots flying the F-15SG Singaporean combat aircraft.* The ground troops will be in civilian clothing and unmarked vehicles.

Though the numbers are confusing, it appears there will be up to 400 day and night-time "training operations" involving a maximum of 1,600 round-trip "sorties" by up to four aircraft over the course of 160 days each year *for an unlimited number of years.* .

Several concerned citizens have put together the following list of concerns which encompass some of the crucial questions and comments that area residents voiced at recent scoping meetings:

1. ***Why are one-third of the training operations for the Singaporean Air Force?*** Is this being done primarily for economic purposes? Who benefits financially from this arrangement? A separate publication describes how USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20.

One Singaporean news story quotes a local politician boasting about protecting his constituents in Singapore from harmful noise pollution from military aircraft. It seems they have shifted this problem to Idaho.

Several other countries operate their own versions of the F-15. What other foreign militaries can be expected to utilize Idaho's new large urban combat zone to avoid unwanted impacts in their own countries? USAF needs to be transparent. In fact, USAF's public outreach letter to stakeholders neglected to mention the Singaporean military planes and only mentioned the US F-15E aircraft.

2. USAF's Urban Close Air Support (CAS) proposal is for an *open-ended, i.e., permanent urban combat zone in Boise and other Idahoan cities, without any mechanism for review* to assess how operations in the urban combat zone will affect our rapidly growing area over time. That is, there is no sunset date or specified date to review potentially negative impacts in light of other developments – including other USAF developments – in the state.
3. *How can the public monitor USAF's compliance with the promised mitigation measures*, such as limiting the number of flights, the flying altitudes, the extent of ground operations, etc.? In fact, USAF disclosed at the scoping meetings that USAF had *already* been conducting urban combat training in Boise – apparently for years – in violation of environmental requirements.
4. *USAF has not adequately analyzed the health, safety, and environmental risks* to humans or wildlife in its draft, and *has not adequately consulted with public officials* about these risks. Regarding noise, the U.S. Environmental Protection Agency states that, "Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity."

The World Health Organization states that "children living in areas with high aircraft noise have delayed reading ages, poor attention levels, and high stress levels." USAF's analysis does not appear to include the cumulative impacts of the noise from the aircraft combined with the existing background noise.

USAF calculations also appear to seriously undercount the proposed number of sorties by at least a third and the number of expected aircraft to be flying sorties. The USAF noise calculations need to be seriously analyzed by independent experts.

5. *Inadequate consultation with public officials, such as state and local law enforcement*, USAF neglected to notify many of the cities and towns that will be affected, and also many of the state legislative districts.

The AF neglected to include the Idaho Department of Environmental Quality on its list of relevant state agencies. Many of the affected cities were not included on the list of stakeholders and the list of state legislators included only two in Idaho and one in Oregon, ignoring numerous legislative districts that are included in the proposed urban combat training zone.

In summary, the list of stakeholders was arbitrary, and there was inadequate consultation with state, local, and federal agencies.

6. USAF *does not appear to be seriously calculating the cumulative impacts* of the proposed permanent urban combat zone and other USAF operations in Idaho, such as the proposed F-35. It appears they may be unlawfully segmenting USAF proposals so as to be able to claim that each of them has negligible impacts. USAF's separate analysis of the impacts of the F-35's has not yet been released.
7. *How does this proposed permanent urban combat zone – the only one in the U.S. – fit with Boise's goal of being the "Most Livable City in the Country"?* Boise and surrounding towns within a 17-mile radius will be adversely impacted by increased noise and air pollution, with military aircraft circling overhead in a "wheel" and teams of "friendly" and "hostile" forces simulating warfare in civilian clothing and unmarked vehicles.
8. The EA does not properly consider all socio-economic impacts. *USAF does not address the psychological impacts on veterans, refugees, and other war survivors of simulated urban warfare* and the activities mentioned above.
9. *The USAF does not address the psychological impacts on current servicemembers of waging simulated urban warfare in "the homeland."*
10. *The USAF has not done an analysis on air or noise quality impact on humans and on wildlife including migratory birds, and domestic animals.*
11. *Why isn't USAF doing a comprehensive Environmental Impact Statement?* This EA includes only minimal analysis of the impacts. USAF regulations state that a full environmental impact statement should normally be conducted for expansion of supersonic training ground lower than 18,000 feet (this plan proposes 10,000 feet), yet the USAF has determined an EIS is not necessary.

I hope that the Air Force will take these considerations into account and decide not to move forward with its proposal.

Sincerely,

Richard Skinner

From: Deborah Max [REDACTED]
Sent: Saturday, October 20, 2018 9:56 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Urban CAS

Dear Ms. Shaver:

I am alarmed by the proposed Urban Close Air Support plan that is being considered and that has been; from my point of view, kept as quiet as possible so citizen's aren't aware of the plans and able to oppose them.

The Treasure Valley is already facing unprecedented growth and its often negative effects; adding the Urban CAS would further impact the Valley and its livability. People have moved here because the Treasure Valley contains the good balance of a vibrant city and wonderful outdoor opportunities. This is not the place for such a plan as is being proposed with the Urban CAS.

Below are some items of concern that must be considered and steps that must be taken before rubber stamping the plan as having no environmental impact.

1. An Environmental Impact Statement must be prepared to fully assess the environmental impacts of this proposed **permanent** program that would include **up to 160 training events per year** for an **unlimited number of years**.
2. The exercises must be limited to U.S. military aircraft. It is unacceptable that one-third of the proposed exercises will be conducted by foreign military aircraft. Idaho cities should not be used as combat training grounds for hire by foreign military forces.
3. USAF needs to set up a system for monitoring compliance with the proposed mitigation measures (including but not limited to number of sorties, flight altitudes, takeoff and landing locations, and locations of operations on the ground). Records must be publicly available.
4. The program needs to be evaluated with affected municipalities on an annual basis, with a comprehensive environmental review after five years to assess the cumulative impacts in light of changed conditions in southern Idaho.
5. Any troops on the ground must be in uniform so they are easily identified by members of the public.

Please consider the community and do NOT proceed with this plan that will benefit the Air Force but be detrimental to those of us who live and pay taxes here.

Thank you for your consideration.

Deborah Max

From: John Robison <jrobison@idahoconservation.org>
Sent: Saturday, October 20, 2018 11:47 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>; 366 FW/PA Public Affairs <366FW.PA.Public.Affairs@us.af.mil>
Cc: John Robison <jrobison@idahoconservation.org>
Subject: [Non-DoD Source] ICL comments on comments on the Draft Environmental Assessment of the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces

Please see our attached comments on the Draft Environmental Assessment of the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho.

Please keep us on the mailing list for this and all other proposals on the Mountain Home Air Force Base.

John Robison
Public Lands Director
Idaho Conservation League
(208) 345-6933 x 13
jrobison@idahoconservation.org



IDAHO
CONSERVATION
LEAGUE

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Noelle Shaver
366 CES/CEIE
1030 Liberator St.
Mountain Home AFB
ID, 83648

noelle.shaver@us.af.mil

366FW.PA.Public.Affairs@us.af.mil

October 20, 2018

Re: Comments on the Draft Environmental Assessment of the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho

Dear Ms. Shaver,

Thank you for considering our comments on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters who have a deep personal interest in ensuring that military training projects are designed to avoid, minimize or mitigate impacts on public health, quality of life, and wildlife.

The Draft Environmental Assessment (EA) is required to disclose the environmental effects of Urban Close Air Support air and ground training spaces near Mountain Home Air Force Base. The document describes a series of training measures in large, medium and small urban centers in southwest Idaho. However, this document does not go into sufficient detail into the actual environmental effects of the proposed action.

We believe that a full Draft Environmental Impact Statement may be necessary. In addition, the Air Force may need to develop additional alternatives to address concerns and issues raised by the public.

Idaho Conservation League comments regarding the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, Page 1 of 3

Public safety

As mentioned in our scoping comments, we recommend that the Air Force ensure that public safety is fully protected during military training exercises. Members of the public may become concerned about unidentified ground support team members and mistake training activities as a real security threat, exposing members of the public and ground support personnel to harm and mental stress. Please describe in additional detail how such scenarios will be handled and what types of coordination will occur with municipalities and local and state law enforcement agencies. |

Human health and wellbeing

The Air Force failed to sufficiently analyze the potentially negative health impacts of noise on humans, particularly with respect to sleep, overall quality of life, and ability to enjoy outdoor activities. Increased air pollution could also result in adverse health effects.

Wildlife impacts and monitoring

With respect to wildlife, the DEA states that “[n]oise levels associated with the Proposed Action would not be of sufficient magnitude to result in the direct loss of individuals or reduce reproductive output.” We wish to point out that noise may have ~~sublethal~~ or other indirect effects that end up reducing reproductive output or displacing individuals or local populations. Species of concern include bighorn sheep, sage-grouse, raptors, sage thrashers, and sage sparrows. In addition, pet dogs may also be negatively affected. The Air Force should expand the section on noise impacts to wildlife and incorporate a comprehensive monitoring program before, during and following activities.

Alternative development

Overflights should be suspended during winter inversions when air quality is already poor.

Ending date

The Air Force also needs to adopt an end date at which this program will be concluded. We recommend establishing a 2-year trial period at the end of which the program will be reanalyzed with additional public input.

Cumulative effects

We recommend expanding the cumulative effects analysis to better address the recent population growth in the Treasure Valley as well as increased levels of air pollutants.

Once again we thank you for the opportunity to submit comments on this project. Please send us any subsequent documents for this project.

Sincerely,



*Idaho Conservation League comments regarding the Draft Environmental Assessment
Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training
Spaces near Mountain Home Air Force Base, Idaho, Page 2 of 3*

From: Kathryn Railsback [REDACTED]
Sent: Saturday, October 20, 2018 5:01 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Comments on Environmental Assessment

Hello, Ms. Shaver,

I am attaching my comments on the USAF Environmental Assessment. Thank you for your consideration.

Best wishes,

Kathy Railsback

--
Kathryn Railsback, Attorney at Law, PLLC
[REDACTED]

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Kathryn Railsback
[REDACTED]

October 20, 2018

Re: Establishment of Urban Close Air Support (CAS) Training Spaces

Dear Ms. Shaver,

Thank you for this opportunity to submit comments. I am opposed to the U.S. Air Force's proposal to establish a roughly 175-mile Urban Close Air Support (CAS) Air and Ground Training Zone in southern Idaho.

Name of Proposal is Misleading. Although the title of the proposal refers to "Training Spaces near Mountain Home, Idaho," in fact when the proposed training spaces are considered together, they form virtually a contiguous stretch of roughly 175 miles stretching from Burley to Nampa, Idaho.

Moral Objections. I am writing as a Mennonite and Christian because I believe that bombing densely populated areas is morally wrong. I have worked with refugees from wars and conflict zones for nearly 40 years, beginning with refugees from the Vietnam War in the 1970s until today, working with people who have survived traumatic experiences in Afghanistan, Iraq, Syria, Somalia, and other conflict zones. I strongly believe that we need a new strategy beyond using bombing to "shock and awe" and intimidate, and that we cannot bomb our way to peace. I believe we need to look at the underlying causes of conflict, which often include poverty, food insecurity, corruption, and other systemic problems. Even though these issues are difficult and time-consuming to address, in the long-run addressing these underlying problems will be more effective in producing lasting solutions and in enhancing America's security. Moreover, I believe it is likely solutions to these issues could likely be achieved at a smaller cost than is spent on military aircraft and sophisticated weapons systems – and with much less suffering on the parts of both U.S. and foreign people involved.

Psychological Damage to Military Servicepersons and Area Residents. Implementation of this proposal would "normalize" simulated urban combat and bombing in American cities. Practicing high-stakes warfare in one's own home country, and coming to view persons in one's own country, even one's own state or city, as "hostile threats" is not healthy psychologically for the military personnel involved. Similarly, having the constant presence of military aircraft overhead could be psychologically damaging for returned veterans, who very well could be in need of respite after multiple tours of duty, or for refugees who have fled from urban warfare and may have been traumatized by bombing by military aircraft. In addition, the proposed activities also "normalize" urban warfare in general and prepare the pilots for bombing in a densely populated area, with its virtually certain attendant civilian casualties and the possibility of being

charged with war crimes. These health and safety issues have not been addressed in the Environmental Assessment.

Inadequate Justification for Use of American Cities and Towns for Combat Practice by Foreign Militaries. USAF Has not demonstrated a need for CAS training in American cities by the Singaporean Air Force. A full one-third of the proposed training operations in the proposal will be conducted by the Singaporean Air Force. USAF has not demonstrated a compelling need for this third of the program, such that it would merit putting Idaho cities at risk for additional noise and air pollution as well as an increased risk of possible aircraft crashes. Is this proposal for training of Singaporean pilots being done primarily for economic purposes? Who benefits financially from this arrangement? A separate environmental publication describes how USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. It appears that Singaporean officials are off-shoring their training so that their local residents do not have to suffer from the negative effects of training with the F-15SG's. It appears that this portion of the proposal seems to be essentially using Idaho cities as a "training ground for hire" and exposing Idaho cities to increased risk primarily for financial purposes. Please explain why Singaporean pilots need to practice with U.S. ground troops. Or, will there be Singaporeans working on the ground to practice with Singaporean pilots, given the proposals references to the need for "integrally linked aircrews and ground support teams (including Joint Terminal Attack Controllers)." Draft FONSI, p. 1. Similarly, the purported need for the proposal is that the "air and ground assets working as one operating unit integrally linked in all communication and coordination efforts to identify, track, and neutralize threats." It should be noted that the stakeholder letter included in the EA fails to make any mention of the training by the F-15SG's and the Singaporean Air Force. This is misleading, if not deceptive, because it does not accurately describe the nature of the proposal, which includes one-third of the flights by a foreign military. Also, it did not give stakeholders adequate notice of the aircraft involved, as the F-15 and the F-15SG have different environmental impacts.

Other Aircraft That May be Substituted in at a Later Date. Several other foreign militaries operate their own versions of the F-15. Will USAF be bringing in other foreign militaries in the future to use southern Idaho as a "training ground for hire"? What environmental analysis will be done in that event?

Improper Segmentation. USAF needs to perform a comprehensive Environmental Impact Statement so that a comprehensive review can be done of the Cumulative Impacts of several USAF proposed activities in southern Idaho, such as those involving the F-35, the embedding of additional F-15SG aircraft, and expansion of training activities at Mountain Home AFB.

Previous Use of Boise and Other American Cities for Possibly Unpermitted CAS Training. The EA states that "The Proposed Action is needed because there are no designated urban environments that can be *reliably used* by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirement." EA 1-6 (emphasis supplied). It was disclosed at the scoping meetings that USAF in fact conducted unpermitted Urban CAS

Training in Idaho cities, apparently for a period of years. The presenter indicated that she had made some effort to determine if such training had been conducted parts of the U.S., but had not been able to identify any similar programs. In order to determine the need for and the cumulative impacts of this proposal, USAF needs to disclose the extent of previous unpermitted use of Boise and any other Idaho cities for CAS training. Also, to clearly evaluate possible alternatives, USAF needs to disclose what other American cities have been used previously for this training. Where have these exercises been done previously and what environmental reviews were done in conjunction with such trainings? Were the cities notified of the training exercises being conducted within their municipalities? What protocols were followed with local law enforcement and the FAA?

Lack of Transparency Regarding the Joint Terminal Attack Controllers. At the two public scoping meetings in Boise, concerned local residents asked numerous questions regarding the activities of the ground support teams, including the Joint Terminal Attack Controllers (JTAC) (referred to collectively as JTAC herein). The presenters said (I'm afraid unpersuasively) that they had tried to reach the officials who would be coordinating the JTAC but were not able to contact them to respond to local residents' questions. Who employs the ground support teams? What branch of the military are they in, if in fact they are U.S. military employees. Are they contractors? It is important for the American public to know who is operating essentially secret in American cities. I and many other Idaho residents are strongly opposed to having military personnel operating in hiding simulating urban warfare. For many years, the public has been encouraged: "If you see something, say something." Now we are supposed to ignore 35 persons in civilian clothing and unmarked vehicles operating suspiciously in our cities and towns. The Cover Sheet states, "Realistic Urban CAS training requires that all members of each ground support team behave in a manner typical of any community member to avoid drawing attention to themselves or the operations. Thus, ground support personnel would be unarmed and dressed in plain clothes." Cover Sheet.

Infeasibility of Training in Four of the Eight Identified Towns. The EA does not explain how 35 individuals from a ground crew, along with four military aircraft can avoid "drawing attention to themselves" in towns such as ~~Glenns~~ Ferry, population 1,278, Grand View, population 457, Hammett, population 458, or Bruneau, population 552. (Population figures are estimates, from census data at https://www.idaho-demographics.com/cities_by_population and other information available on the internet.) That is, is this training even feasible in those areas if it is a requirement that ground support teams are supposed "to avoid drawing attention to themselves or the operations"? Numerous attendees at the scoping meetings expressed concern about the number of armed households in Idaho and potential risks to the members of the ground support teams. The EA does not address these safety issues, nor does it describe a protocol for working with local law enforcement teams. The EA should discuss the alternative of using existing USAF or other U.S military "mock villages" for these training exercises rather than these Idaho towns.

An EIS Should be Performed Under USAF Regulations.

An EIS should be conducted. 32 C.F.R. § 989.16 (b)(6) states that "Certain other actions normally, but not always, require an EIS. These include, but are not limited to: . . .

(6) Establishing or expanding supersonic training areas over land below 30,000 feet MSL (mean sea level).”

32 C.F.R. §989.16(a) states

(a) Certain classes of environmental impacts normally require preparation of an EIS ([40 CFR 1501.4](#)). These include, but are not limited to:

- (1) Potential for significant degradation of the environment.
- (2) Potential for significant threat or hazard to public health or safety.
- (3) Substantial environmental controversy concerning the significance or nature of the environmental impact of a proposed action.

The present proposal involves training at 10,000 feet, it is permanent, that is, for an unlimited number of years; it covers an enormous expanse of land (roughly 175 miles), a population of roughly half a million Idahoans, and it involves up to 160 days (1400 sorties) of training per year. It is irresponsible for USAF to determine that this project has “no significant impact.” USAF has made a clear error in this determination and should prepare an EIS. This is particularly the case as the proposal is open-ended and does not include any mechanism for reviewing the impacts of the training operations in light of the many changes that will undoubtedly occur in Idaho’s rapidly growing Treasure Valley.

USAF has not adequately analyzed the health, safety, and environmental risks to humans or wildlife in its draft. In particular, there are significant discrepancies between the numbers of training events, operations and sorties listed in different sections of the EA, as well as a significant discrepancy in the baseline of operations described in the Description of the Proposed Action and Alternatives (DOPAA) and the EA. Section 2.1.5 of the EA states, Under the updated Proposed Action, 160 Urban CAS proficiency training events (involving 400 training operations)) would be expected . . . during surges in preparation for deployment (i.e., surges).” First, does this mean that the F-15SGs will not be participating in these “surges”? How many training operations will be conducted *in addition to* those conducted during the “surges”? The EA states that during each training operation a maximum of four aircraft would participate. Four hundred training operations, with four sorties per training operation, would result in a total of 1600 sorties per year. Yet Section C.3 (Flight Operations) refers to a combined number of landings and takeoffs of 951 (634 for the F-15E and 317 for the F-15SG). Also, this appears to be for only two aircraft, not four as anticipated? Or does the two refer to the two types of aircraft? Similarly, the noise analysis is based on a calculation of 624 day-training and 336 day-night sorties, (B-3, n. 2) for a total of 960 sorties, whereas the previous section indicates 400 operations with 4 sorties per operation.

In minimizing the impact, the EA suggests that the proposed training is essentially moving the CAS training from the AFB to the proposed training zone. Does this mean that the AFB training operations will be reduced accordingly? What are the exact numbers of operations being conducted presently at the AFB? Page 1-4 of the EA states that the baseline total for airfield sorties and operations stands at the AFB is 60,559 per year. It also states that “Annually,

approximately 160 training events involving approximately 960 sortie operations are conducted on the installation for Urban CASE training.” However, the Final DOPAA for this proposal states, “The baseline total for flight operations at Mountain Home AFB is approximated at 70,704 operations per year and includes all Mountain Home AF and transient aircraft operations.” The discrepancies between these numbers are widely divergent, making it virtually impossible to accurately assess the impacts of the proposal. Some of the USAF calculations also appear to seriously undercount the proposed number of sorties by at least a third and the number of expected aircraft to be flying sorties. The USAF noise calculations need to be seriously analyzed by independent experts.

USAF has not adequately consulted with public officials about these risks. Many of the affected cities were not included on the list of stakeholders and the list of state legislators included only two in Idaho and one in Oregon, ignoring numerous legislative districts that are included in the proposed urban combat training zone. In addition, USAF neglected to include the Idaho Department of Environmental Quality on its list of relevant state agencies. USAF either needs to do a comprehensive EIS or re-do its EA with appropriate public process and consultation.

Inadequate notice. USAF did not follow appropriate notice procedures. While it originally published a notice in the Idaho Statesman, at the time it published the notice, it had not yet publicly released Volume 2 of the EA. Did USAF publish a new notice in the appropriate newspapers (with a new public comment period) after it publicly released Volume 2? This would have given readers an appropriate amount of time to comment. In fact, Volume 2 was not released until an individual stakeholder contacted USAF and requested it, approximately one week after the newspaper notice. As mentioned above, USAF should either do a comprehensive EIS or re-do its EA with appropriate notice.

Thank you for this opportunity to comment.

Sincerely,

Kathy Railsback

From: Pro- Life <[REDACTED]>
Sent: Saturday, October 20, 2018 9:09 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] War Games in Idaho

Dear Noelle,

The idea of maintaining a standing army was repugnant to the Founders of this country and is an anathema to the principles of Liberty and freedom. Maintaining a standing army destroys Liberty by burdening the People with increased taxation and eventually compulsory service. Standing armies are always used by those who wield political power to accomplish a political agenda at the expense of the citizenry. Every nation in History that has created a standing army has destroyed not only the liberties and freedoms of their own people but nations abroad through unnecessary war mongering. Any excuse can be used to create a 'state of war' in which civil liberties are destroyed, such as the endless "war on Terrorism" in America. The so-called Patriot Act and NDAA are prime examples of how Liberty has been attacked in this country.

The fact that the Air Force will "make a decision after considering input" reveals not only how much control it exerts over Americans, but also the arrogance and oppressive nature of our military industrial complex. If there is insufficient oversight and constraint exercised by The Congress, then it is up to the individual officers in the Armed Forces to stand against unlawful orders.

To what end are these exercises directed at accomplishing? There are already sufficient training areas to practice bomb and strafing runs in the confinement of military reservations. It can only be assumed that the purpose for a 'realistic' training of the military in a city or town in America is for the purpose of performing military operations there in the near future.

Any war exercise that uses land or resources outside of designated military facilities is an affront to the peace we are entitled to attend as People of the united States of America. I demand the Air Force stand down and consider who ought to wield the Constitutional power in this country.

Sincerely and respectfully,

Paul Smith

A homeless veteran residing in Idaho

From: Carole <[REDACTED]>
Sent: Sunday, October 21, 2018 3:19 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Cc: [REDACTED]
Subject: [Non-DoD Source] CAS Air and Ground Training Spaces

I am writing today to voice my opposition to using Boise and Southern Idaho as an urban combat training ground.

The Urban Close Air Support (CAS) Air and Ground Training Spaces in Urban Centers in Idaho-the large-scale **permanent** urban combat training zone extending roughly 175 miles across southern Idaho; involving U.S. and Singaporean pilots in F-15E and F-15SG aircraft respectively coordinating with teams of up to 35 troops on the ground. Approximately one-third of the proposed operations will be conducted by Singaporean military pilots flying the F-15SG Singaporean combat aircraft. The ground troops will be in civilian clothing and unmarked vehicles.

I hope you will not move forward with this plan.

Sincerely,
Carole J. Skinner

From: Carolyn and Mike <[REDACTED]>
Sent: Monday, October 22, 2018 11:58 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Cc: mayor@cityofboise.org

Subject: [Non-DoD Source] I am opposed to the U.S. Air Force's proposal to establish a roughly 175-mile Urban Close Air Support (CAS) Air and Ground Training Zone in southern Idaho.

Dear Ms. Shaver,

Thank you for this opportunity to submit comments. I am opposed to the U.S. Air Force's proposal to establish a roughly 175-mile Urban Close Air Support (CAS) Air and Ground Training Zone in southern Idaho. I believe it would negatively effect quality of life in our cities and among our civilian population.

Name of Proposal is Misleading. Although the title of the proposal refers to "Training Spaces near Mountain Home, Idaho," in fact when the proposed training spaces are considered together, they form virtually a contiguous stretch of roughly 175 miles stretching from Burley to Nampa, Idaho.

Psychological Damage to Military Servicepersons and Area Residents. Implementation of this proposal would "normalize" simulated urban combat and bombing in American cities. Practicing high-stakes warfare in one's own home country, and coming to view persons in one's own country, even one's own state or city, as "hostile threats" is not healthy psychologically for the military personnel involved. Similarly, having the constant presence of military aircraft overhead could be psychologically damaging for returned veterans, who very well could be in need of respite after multiple tours of duty, or for refugees who have fled from urban warfare and may have been traumatized by bombing by military aircraft. In addition, the proposed activities also "normalize" urban warfare in general and prepare the pilots for bombing in a densely populated area, with its virtually certain attendant civilian casualties and the possibility of being charged with war crimes. These health and safety issues have not been addressed in the Environmental Assessment.

Inadequate Justification for Use of American Cities and Towns for Combat Practice by Foreign Militaries. USAF Has not demonstrated a need for CAS training in American cities by the Singaporean Air Force. A full one-third of the proposed training operations in the proposal will be conducted by the Singaporean Air Force. USAF has not demonstrated a compelling need for this third of the program, such that it would merit putting Idaho cities at risk for additional noise and air pollution as well as an increased risk of possible aircraft crashes. Is this proposal for training of Singaporean pilots being done primarily for economic purposes? Who benefits financially from this arrangement? A separate environmental publication describes how USAF, at the request of Singapore's Ministry of Defense, proposes to increase the number of permanently stationed F-15SG Singaporean aircraft at Mountain Home AFB from 14 to 20. It appears that Singaporean officials are off-shoring their training so that their local residents do not have to suffer from the negative effects of training with the F-15SG's. It appears that this portion of the proposal seems to be essentially using Idaho cities as a "training ground for hire" and exposing Idaho cities to increased risk primarily for financial purposes. Please explain why Singaporean pilots need to practice with U.S. ground troops. Or, will there be Singaporeans working on the ground to practice with Singaporean pilots, given the proposals references to the need for "integrally linked aircrews and ground support teams (including Joint Terminal Attack Controllers)." Draft FONSI, p. 1. Similarly, the purported need for the proposal is that the "air and ground assets working as one operating unit integrally linked in all communication and coordination efforts to identify, track, and neutralize threats." It should be noted that the stakeholder letter included in the EA fails to make any mention of the training by the F-15SG's and the Singaporean Air Force. This is misleading, if not deceptive, because it does not accurately describe the nature of the proposal, which includes one-third of the flights by a foreign military. Also, it did not give stakeholders adequate notice of the aircraft involved, as the F-15 and the F-15SG have different environmental impacts.

Other Aircraft That May be Substituted in at a Later Date. Several other foreign militaries operate their own versions of the F-15. Will USAF be bringing in other foreign militaries in the future to use southern Idaho as a "training ground for hire"? What environmental analysis will be done in that event?

Improper Segmentation. USAF needs to perform a comprehensive Environmental Impact Statement so that a comprehensive review can be done of the Cumulative Impacts of several USAF proposed activities in southern Idaho, such as those involving the F-35, the embedding of additional F-15SG aircraft, and expansion of training activities at Mountain Home AFB.

Previous Use of Boise and Other American Cities for Possibly Unpermitted CAS Training. The EA states that "The Proposed Action is needed because there are no designated urban environments that can be *reliably used* by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirement." EA 1-6 (emphasis supplied).

The fact there is no precedent set for this type of training over a civilian population anywhere in the U.S. should cause alarm to our cities in Southern Idaho. Why would any city want this ongoing training impacting daily life?

Sincerely,
Carolyn Eabis

From: Fuji Kreider <[REDACTED]>
Sent: Monday, October 22, 2018 12:04 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Cc: 'Fuji Kreider' <[REDACTED]>
Subject: [Non-DoD Source] Comment: Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces

Dear Ms Shaver,
Attached and below are my comments on the CAS EA. I hope that they will be considered because I was confused about the deadline for comments. Moreover, I hope that you will take my points under consideration and authorize a full EIS be conducted for this proposed project.
Thx you,
C. Fuji Kreider

Ms. Noelle Shaver
366 A6 7/A7IE
1030 Liberator Street
Mountain Home, Idaho 83648

October 20, 2018

RE: Urban CAS EA – Comments

Dear Ms. Shaver,

Thank-you for the opportunity to comment on the Draft Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. From 1982-1987, I lived in Boise's north-end and I currently live in La Grande, Oregon. I have family and friends in Boise and come to Boise on a monthly basis for business and medical services. The potential impact of the Air Force's proposed training activities on the quality of life in Boise as well as the negative impacts of noise and safety on the thriving population and surrounding environment is extremely concerning.

Establishment of the Urban CAS in Boise and other communities represents a significant expansion of the Mountain Home Air Force Base's training range. Such an expansion warrants a more detailed analysis of environmental impacts and alternatives through an expanded NEPA process and full Environmental Impact Statement (EIS.) Some of my specific concerns about the proposed activities are as follows:

Noise: I have lived near airports and a Strategic Air Command (SAC) Air Force base back east. The noise from air traffic needs a much more thorough analysis because they are NOT insignificant effects. The Air Force acknowledges that the F-15E and F-15SG are louder than a commercial airliner. Unlike a commercial airliner which takes off and is gone in a matter of minutes, the F-15s will be engaged in a single training event for up to 90 minutes with cumulative operations occurring for up to 6 hours over a community on a training day. The noise duration for these events is in no way comparable to that of commercial airliners. Your whole body shakes and no conversation can occur. It is more disruptive and the disruption will occur over a prolonged period with an adverse effect on the quality of life for the impacted communities.

Air Quality: Boise has significant air quality issues in both winter and summer due to inversions, smoke and dust. Boise does not need additional pollutants that are unnecessary, unhealthy and contribute to greenhouse gas emissions too. These cumulative effects must be analyzed and considered in a full EIS.

Health and Safety: In addition to noise and air quality, mentioned above, the Air Force's plan does not take into account the full range of health and safety concerns for a growing population the size of Boise. Accidents happen and flying complex military jets loaded with fuel over densely populated areas greatly increases the catastrophic impacts of an inevitable accident. Local emergency preparedness is not fully equipped or funded for such catastrophic incidents. And, as the airport continues to grow and expand creating cumulative risks, a more in-depth analysis, like an full EIS, is warranted.

Biological Resources: The EA is also dismissive of impacts to biological resources. While there are no direct disturbances on the ground, the assertion that there are no impacts to wildlife is an erroneous statement. The impact of increased noise levels on wildlife, in particular on nocturnal species, migratory birds and bats, must be thoroughly studied.

Livestock: Similar to the impacts on biological resources, impacts on livestock and the range economy must be studied. Regardless of the lack of "on-the-ground" disturbances, noise will have a huge impact on livestock and their viability. This needs further study to determine impacts, as well as appropriate mitigation measures.

Environmental Justice: The EA does not evaluate issues of Environmental Justice, dismissing concerns from the outset. This is not acceptable! EJ issues—especially with noise and safety—must not be ignored.

Property Values: There is no way that the property values in Boise and vicinity will NOT be impacted! This needs further investigation and study. What will the impacts be? What will it do to the tax base of the city or surrounding towns and how will it impact their future economic development prospects? What are the alternatives and how can these impacts be mitigated? Quickly, this study becomes complex and I encourage you to commence a full NEPA analysis.

In summary, the proposed training activities have the potential to significantly impact the local environment and wildlife; the quality of life, health and safety of the citizens of Boise; the local economy and property values; and it may further impact livestock and the range economy. It doesn't take high level scientists or economists to see the fact that a more thorough analysis of the full range of alternatives is in order. I urge you to please initiate a full NEPA/Environmental impact Statement process, before moving forward.

Thank-you for your time and consideration of my comments,



C. Fuji Kreider

From: Patricia Gorla <[REDACTED]>
Sent: Monday, October 22, 2018 12:37 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] RE: Urban CAS EA

Ms. Shaver,

We, the undersigned members of the Stop Urban War Idaho Coalition and the Idaho community, call for an immediate cessation of plans to implement Urban Close Air Support training across the cities of Idaho.

These plans represent an unprecedented overreach and injection of militarism into the lives of people in the country, and indeed all people across the globe. The establishment of a permanent training zone for urban war above the skies of inhabited cities are not within the interest of working people, and we call for the immediate cessation of all plans to promote urban war.

Signed,
Patricia Gorla, Stop Urban War Idaho Coalition
Max Shue, Stop Urban War Idaho Coalition
Cam Larsen, Stop Urban War Idaho Coalition
Michelle Doty, Stop Urban War Idaho Coalition
Austin Negaard Walters, Stop Urban War Idaho Coalition
Mike Frazier
Mike Dorey
Ian Bott
Molly Haarhoff
Marjie Jacobs
Kathryn Railsback
Paul Smith

From: Robert Hanson <[REDACTED]>
Sent: Monday, October 22, 2018 11:19 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Comments on proposed urban combat training in Boise

I am writing to express my concern about the proposed use of Boise or any other US city as a combat training zone. It seems that with today's virtual reality technology it shouldn't be necessary to use a live city to meet the training objectives. If it is imperative to use a live city, those imperatives should be explicitly justified. Unfortunately, arguments related to defense spending are hard to combat because there are always steps we could take to do more to protect ourselves. I think that is one reason our defense budget is so massive and dwarfs other national defense budgets. Most of the other top spenders are our allies.

A part of the proposal that I find particularly distasteful is that a significant portion of the training is for Singapore. I don't feel like we should be dummy targets for the US military and feel even more strongly that we shouldn't be dummy targets for the Singapore military.

Thanks for your consideration.

Rob Hanson
[REDACTED]

From: Tim Yoder <[REDACTED]>
Sent: Monday, October 22, 2018 2:39 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Cc: Mayor@cityofboise.org
Subject: [Non-DoD Source] Proposed Boise Urban Bombing

Ms. Shaver,
I'm opposed to the practice of the Air Force using Boise or any Idaho city as a practice area to bomb the places innocent people live. It is not morally acceptable to normalize the bombing of any city, let alone a city in one's own country. Until a complete Environmental Impact Study is done, we do not know what this proposal will likely affect and how this proposal will negatively impact those living in Boise. The USAF has done a very poor job of informing the public of the details and impacts this proposal would bring to those living in Boise. Much more public information needs to occur before this can go forward. Although Boise's mayor publicly endorses this proposal, he contradicts himself by saying he wants to improve quality of life in Boise. This proposal degrades quality of life, not improves quality of life.

Thank you for considering these comments,

Tim Yoder
Boise, Idaho

From: gregariously anonymous <[REDACTED]>
Sent: Monday, October 22, 2018 7:21 AM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] comment period over

Noelle,
I recognize that I am late in writing, and I'll write anyway. These points need to be considered for the Urban Combat Training Proposal.

1. An Environmental Impact Statement must be prepared to fully assess the environmental impacts of this proposed permanent program that would include up to 160 training events per year for an unlimited number of years.
2. The exercises must be limited to U.S. military aircraft. It is unacceptable that one-third of the proposed exercises will be conducted by foreign military aircraft. Idaho cities should not be used as combat training grounds for hire by foreign military forces.
3. USAF needs to set up a system for monitoring compliance with the proposed mitigation measures (including but not limited to number of sorties, flight altitudes, takeoff and landing locations, and locations of operations on the ground). Records must be publicly available.
4. The program needs to be evaluated with affected municipalities on an annual basis, with a comprehensive environmental review after five years to assess the cumulative impacts in light of changed conditions in southern Idaho.
5. Any troops on the ground must be in uniform so they are easily identified by members of the public.

Thank you for your responsible consideration.
Sincerely,

Greg Wozniak



Mon 10/22/2018 4:07 PM

ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE <sheri.robertson@us.af.mil>

Urban CAS Training Draft EA

To [REDACTED]

Cc [X] SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE; [X] ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE

We removed extra line breaks from this message.

Mr. Wozniak,

Thank you for your comments. All comments, and associated responses, will be included in the final document.

Respectfully,

Sheri Robertson
Branch Chief, Environmental
366 A6 7/A7IE
1100 Liberator Street
Mountain Home AFB ID 83648

DSN: 728-2299
Commercial: 208-828-2299

From: Kathryn Railsback <[REDACTED]>
Sent: Wednesday, October 24, 2018 4:18 PM
To: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>
Subject: [Non-DoD Source] Copies of EA at Libraries

Hello, Noelle,

I wanted to let you know that I checked with librarians at the Boise and Twin Falls Public Libraries and they apparently did not receive copies of the EA for the Urban CAS, as indicated in the Notice of Availability. I just checked with those two as they are the biggest municipalities. I am wondering if the other libraries mentioned in the Notice also did not receive copies of the EA for public review? Given this omission, I would expect that the notice period be re-started again after the copies are received by the indicated libraries.

Thanks for your consideration.

Sincerely,

Kathy Railsback

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Kathryn Railsback, Attorney at Law, PLLC



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-----Original Message-----

From: ROBERTSON, SHERI L CIV USAF ACC 366 A6 7/A7IE

Sent: Thursday, October 25, 2018 9:37 AM

To: [REDACTED]

Cc: SHAVER, NOELLE C GS-12 USAF ACC 366 A6 7/A7IE <noelle.shaver@us.af.mil>

Subject: RE: [Non-DoD Source] Copies of EA at Libraries

Ms. Railsback,

Thank you for your comment. Copies of the Draft EA for the Urban CAS were provided to public libraries indicated in the Notice of Availability. Each library acknowledged receiving the Draft Urban CAS EA through signature. The signed receipts are maintained in the administrative record and will be included in the completed document.

Respectfully,

Sheri Robertson
Branch Chief, Environmental
366 A6 7/A7IE
1100 Liberator Street
Mountain Home AFB ID 83648

DSN: 728-2299
Commercial: 208-828-2299



B

Support Information for
Noise Analysis



A-weighted decibel — Decibel measurement on the “A-weighting” scale. A decibel adjusted (weighted) to reflect the relative loudness of sounds most sensitive to human ears.

Noise Contour — Noise contours are a series of line superimposed on a map of the airport’s environs. These lines represent various DNL levels - typically 65 through 85 dBA.

Day-Night Average Sound Level (DNL) — The average sound energy in a 24-hour period with a 10 dB penalty added to the nighttime levels of 10:00 p.m. to 7:00 a.m.

Decibel (dB) — A unit used to express the intensity of a sound wave, equal to 20 times the common logarithm of the ratio of the pressure produced by the sound wave to a reference pressure, usually 0.0002 microbar.

Equivalent Sound Level (L_{eq}) — The average sound level in decibels.

Maximum Sound Level (L_{max}) — Maximum sound level in decibels.

NoiseMap — A suite of computer programs and components developed by the Air Force to predict noise exposure in the vicinity of an airfield due to aircraft flight, maintenance, and ground run-up operations.

Sound Exposure Level (SEL) — A measure of the total energy of an acoustic event. It represents the level of a 1-second long constant sound that would generate the same energy as the actual time-varying noise event such as an aircraft overflight. SEL provides a measure of the net effect of a single acoustic event, but it does not directly represent the sound level at any given time.

Appendix B - Noise Comparison of Other Potential Urban CAS Aircraft

PRELIMINARY REVIEW OF NOISE GENERATED BY MILITARY AIRCRAFT

If aircraft other than the F-15E or F-15SG were to be used during Urban CAS training in the future, either at Mountain Home AFB or over other urban centers, subsequent NEPA analysis and comprehensive noise modeling would be conducted to specifically address potential noise impacts from each aircraft platform and its respective flight activities. **Table B-1** provides a preliminary review of noise levels of some of the other military aircraft that are typically flown in support of other USAF flight training operations at Mountain Home AFB and in the region. Analysis of generated noise levels listed in **Table B-1** assumes the same Urban CAS flight operation parameters as those described for the Proposed Action. For all aircraft reviewed, the estimated DNL/Ldnmr under the CAS Wheel would remain below 65 dBA DNL, and would be fully compatible with all land use categories. Generally, noise generated by the aircraft listed in **Table B-1** would be below the thresholds speech and sleep interference, resulting in less than significant impacts on the environment. Noise generated by B-1 aircraft flight would exceed the speech interference threshold, but not the sleep interference threshold. Based upon this preliminary review, it is likely that the overall noise impacts for any combination of the aircraft identified in **Table B-1** conducting similar high-altitude Urban CAS operations would have less than significant impacts. Using B-1 aircraft would have less than significant effects; however, best management practices such as limiting their operations to daytime hours, above 16,000 feet AGL, and not concentrated over any single location would help reduce these already limited effects.

Table B-1. Noise Comparison of High-Altitude Urban CAS Overflights for Military Aircraft

Aircraft	F-15SG	F-15E	MC-12	U-28	A-10	AC-130	F-18/ EA-18G	B-1
Cruise Power Settings								
Slant Distance (ft)	Sound Exposure Level (dBA SEL)							
10,000	66.32	64.82	51.92	51.92	56.02	64.9	71.6	73.3
12,500	63.42	61.92	49.12	49.12	53.02	62.2	68.0	69.9
16,000	60.32	58.82	46.02	46.02	49.92	59.3	64.0	66.4
20,000	57.02	55.52	42.62	42.62	46.62	56.5	59.8	62.7
25,000	53.42	51.92	38.72	38.72	43.12	53.5	55.2	58.9
Slant Distance (ft)	Maximum Sound Levels (dBA Lmax)							
10,000	53.32	51.8	41.12	41.12	46.52	52.5	61.8	63.0
12,500	49.82	48.3	37.72	37.72	42.92	49.2	57.6	59.1
16,000	46.22	44.7	34.02	34.02	39.22	45.8	53.0	55.0
20,000	42.32	40.8	30.02	30.02	35.32	42.3	48.2	50.7
25,000	38.12	36.6	25.52	25.52	31.2	38.7	43.0	46.2
Intermediate Power Settings								
Slant Distance (ft)	Sound Exposure Level (dBA SEL)							
10,000	66.4	64.9	51.9	51.9	61.2	64.9	67.6	83.8
12,500	63.4	61.9	49.1	49.1	58.0	62.2	64.1	80.4
16,000	60.2	58.7	46.0	46.0	54.8	59.3	60.3	76.9
20,000	56.7	55.2	42.6	42.6	51.4	56.5	56.2	73.1
25,000	53.1	51.6	38.7	38.7	47.8	53.5	52.0	69.2
Slant Distance (ft)	Maximum Sound Levels (dBA Lmax)							
10,000	53.1	51.6	41.1	41.1	52.7	52.5	57.5	72.0
12,500	49.5	48.0	37.7	37.7	48.9	49.2	53.4	68.0
16,000	45.7	44.2	34.0	34.0	45.1	45.8	49.0	63.8
20,000	41.7	40.2	30.0	30.0	41.1	42.3	44.4	59.5
25,000	37.4	35.9	25.5	25.5	36.9	38.7	39.5	55.0
Estimated DNL/Ldnmr Under CAS Wheel [dBA DNL] ^{1,2}	36.9	35.4	<35	<35	<35	<35	42.2	43.9
Composite Metrics for a Four-Aircraft Formation Overflight at 10,000 AGL								
Estimated Lmax	59.1	57.6	47.1	47.1	58.7	58.5	63.5	78.0
Exceeds Thresholds for Speech Interference (Lmax > 70 dBA)	No	No	No	No	No	No	No	Yes
Estimated SEL	72.4	70.9	57.9	57.9	67.2	70.9	73.6	89.8
Exceeds Thresholds for Sleep Interference (SEL > 90 dBA)	No	No	No	No	No	No	No	No

Notes:

1 – This analysis represents a reasonable upper-bound assessment for F-15E and F-15SG aircraft conducting 240 daytime and 160 day-night Urban CAS training operations, annually, at a minimum altitude of 10,000 ft AGL in an airspace operating area with a 15-NM diameter.

2 – This assumes they conduct no more than 624 day-training and 336 day-night sorties. These operations would include 60 to 90-minute Urban CAS exercises above 10,000 ft AGL with a CAS wheel 15-NM in diameter. This also assumes individual overflights would never consist of more than four-aircraft in formation at 10,000 ft AGL.

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C

Air Quality Calculations and
Methodology



RECORD OF NON-APPLICABILITY

In Accordance with the CAA - General Conformity Rule for the
Urban Close Air Support Originating from
Mountain Home Air Force Base, Idaho

May 11, 2018

This Record of Non-Applicability supports USAF's *Environmental Assessment for the proposed Urban Close Air Support and Joint Terminal Air Control Training*. The Proposed Action consists of F-15E and F-15SG aircraft originating from Mountain Home Air Force Base and conducting training at as many as nine urban centers, including the installation, in the region. All aircraft training events would take place at altitudes at or higher than 10,000 feet.

The City of Boise is a partial maintenance area for particulate matter 10 micrometers or less in diameter (PM₁₀) and carbon monoxide (CO). All other areas associated with the Proposed Action are designated as attainment areas by the U.S. Environmental Protection Agency. General conformity under the Clean Air Act, Section 176 has been evaluated according to the requirements of 40 Code of Federal Regulations § 93, Subpart B. The requirements of this rule are not applicable to the Proposed Action because:

Activities would only include emissions that were clearly *de minimis*, such as emissions from training operations above the mixing height of 3,000 feet above ground level (i.e., the height above which air emissions do not directly affect individuals on the ground.) (40 Code of Federal Regulations § 93.153 (c) (xxii)) or would occur within areas designated full attainment for the National Ambient Air Quality Standards.

Supported documentation and emission estimates:

- ☐ Are Attached
- ☐ Appear in the National Environmental Policy Act Documentation
- ☒ Other (Not Necessary)

Signature

Title

Date

DETAILED AIR CONFORMITY APPLICABILITY MODEL REPORT

1. General Information

- Action Location

Base: MOUNTAIN HOME AFB

County(s): Elmore; Ada; Cassia; Owyhee; Twin Falls

Regulatory Area(s): NOT IN A REGULATORY AREA

- Action Title: Urban CAS

- Project Number/s (if applicable): Urban CAS Operations

- Projected Action Start Date: 1 / 2019

- Action Purpose and Need:

Operational support from Mountain Home AFB

C.1 General Information & Timeline Assumptions

- Activity Description:

Conduct high altitude (>10,000 AGL) air operation over urban centers near Mountain Home AFB using F-15E and F-15SG aircraft.

- Activity Start Date

Start Month: 1

Start Year: 2019

Indefinite: Yes

- Activity Emissions:

Pollutant	Emissions Per Year (TONs)		Total
	F-15E	F-15SG	
VOC	15.57	0.11	15.67
SO _x	3.22	1.11	4.34
NO _x	38.10	10.04	48.14
CO	5.84	6.40	12.24
PM _{2.5}	8.00	1.39	9.39
PM ₁₀	7.21	0.92	8.12

C.2 Aircraft & Engines

- Aircraft & Engine

Aircraft Designation: F-15E and F-15SG

Engine Model: F100-PW-220 and F110-GE-100

Primary Function: Combat

Number of Engines: 2

Aircraft & Engine Emissions Factors (lb/1000lb fuel):

	Fuel Flow	VOC	SO _x	NO _x	CO	PM ₁₀	PM _{2.5}	CO _{2e}
F-15E								
Idle	1084.00	7.94	1.06	4.61	35.30	2.06	1.85	3234
Approach	3837.00	5.12	1.06	12.53	1.92	2.63	2.37	3234
Intermediate	5770.00	2.89	1.06	22.18	0.86	2.06	1.85	3234
Military	9679.00	1.79	1.06	29.32	0.86	1.33	1.20	3234
After Burn	41682.00	1.53	1.06	8.37	11.99	1.15	1.04	3234
F-15SG								
Idle	1111.00	0.22	1.06	3.77	24.11	2.60	1.12	3234
Approach	5080.00	0.03	1.06	9.78	5.77	1.37	0.91	3234
Intermediate	7332.00	0.05	1.06	16.92	3.47	0.58	0.41	3234
Military	11358.00	0.04	1.06	29.00	3.38	0.14	0.00	3234
After Burn	18088.00	1.21	1.06	14.26	67.41	3.35	2.98	3234

C.3 Flight Operations

- Flight Operations

Number of Aircraft: 2

Number of Annual LTOs (Landing and Take-off) cycles for F-15E: 634

Number of Annual LTOs (Landing and Take-off) cycles for F-15SG: 317

- Flight Operations TIMs (Time In Mode)

Approach/Cruise (mins): 75

- Aircraft Emissions per Mode for LTOs per Year

$$\text{AEMPOL} = (\text{TIM} / 60) * (\text{FC} / 1000) * \text{EF} * \text{NE} * \text{LTO} / 2000$$

AEMPOL: Aircraft Emissions per Pollutant & Mode (TONs)

TIM: Time in Mode (min)

60: Conversion Factor minutes to hours

FC: Fuel Flow Rate (lb/hr)

1000: Conversion Factor pounds to 1000pounds

EF: Emission Factor (lb/1000lb fuel)

NE: Number of Engines

LTO: Number of Landing and Take-off Cycles (for all aircraft)

2000: Conversion Factor pounds to TONS

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D

NHPA Section 106
Documentation





**DEPARTMENT OF THE AIR FORCE
366 CIVIL ENGINEER SQUADRON (ACC)
MOUNTAIN HOME AIR FORCE BASE IDAHO**

February 6, 2018

**MEMORANDUM FOR: MR. MATT HALITSKY, HISTORIC PRESERVATION REVIEW OFFICER,
IDAHO STATE HISTORIC PRESERVATION OFFICE**

FROM: 366 CES/CEIE
1030 Liberator Street
Mountain Home AFB ID 83648

**SUBJECT: Description of the Proposed Action and Alternatives for an Environmental Assessment
Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training
Spaces near Mountain Home Air Force Base, Idaho**

In accordance with the National Environmental Policy Act and its implementing regulations, the United States Air Force (USAF) and the 366th Fighter Wing have initiated development of an Environmental Assessment (EA) to evaluate proposed establishment of air and ground training spaces in urban centers located near Mountain Home Air Force Base (AFB) to support Urban Close Air Support (CAS) proficiency training for F-15E aircrews. Training in urban centers is needed because these areas provide an environment with the same tactical challenges encountered during deployment. Nine urban centers have been identified for this training: Boise, Mountain Home, Burley, Twin Falls, Grandview, Glenns Ferry, Bruneau, Hammett, and Mountain Home AFB. The purpose of this letter is to respectfully invite your participation in the evaluation and preparation of the EA.

The proposed training would be limited to coordinated flight and ground tracking of simulated targets in the urban centers. Analysis in the EA will address Urban CAS training scenarios wherein aircrews would fly over urban centers and, with the support of ground teams including Joint Terminal Attack Controllers simulating "friendly forces," would use electronic communications equipment and global positioning systems (GPS) to identify, track, target, and complete a mock-neutralization (i.e., electronically simulated engagement) of "opposing forces" teams. Ground teams would use electronic communication devices, GPS, and low-power, eye-safe lasers that would be visible to the aircraft to mark targets. Realistic preparation for Urban CAS ground activities during deployments would require that all members of each ground support team behave in a manner typical of any community member to avoid drawing attention to themselves or the operations. Thus, ground support personnel would be unarmed and dressed in plain clothes. Members of each ground support team would be inside civilian vehicles driving along city paved streets and paved roadways during training operations. Ground support personnel may be positioned on paved roads located anywhere within the ground operating area, such as in vehicles driving along streets or parked along the side of a road. Individuals among the ground teams may momentarily exit the vehicle onto sidewalks or in parking lots to establish or re-establish communications with aircrews. Ground support would not interfere with civilian traffic or pedestrians. All activities would be conducted IAW local laws and ordinances and with the goal of leaving no trace of their activities.

In accordance with Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and its implementing regulations at 36 CFR 800, Mountain Home AFB Cultural Resources Manager (CRM) has reviewed the proposed action and determined it meets the definition of an undertaking per 36 CFR 800.16(y). However, because the undertaking is limited to coordinated flights operating within established airspace thresholds while engaging in electronic tracking exercises with unarmed ground

forces operating within existing public access areas (paved roads, rights-of-way, sidewalks), the Mountain Home AFB CRM has determined the undertaking has no potential to cause effects to historic properties, assuming such properties were present, in accordance with 36 CFR 800.3(a)(1). The attached Description of Proposed Action and Alternatives, which will become Sections 1 and 2 of the EA. USAF anticipates publishing the Draft EA in spring and the Final EA in summer 2018.

We respectfully request receipt of any comments or concerns within 30 days or receipt of this correspondence. If you have any questions, or require additional information, please contact Ms. Noelle Shaver at (208) 828-8003 or noelle.shaver@us.af.mil.

Respectfully



SHERI L. ROBERTSON
Chief, Environmental Management

Attachment:

Description of the Proposed Action and Alternatives for Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho, January 2018.



IDAHO STATE
HISTORICAL
SOCIETY



C.L. "Butch" Otter
Governor of Idaho

Janet Gallimore
Executive Director
State Historic
Preservation Officer

Administration:
2205 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2682
Fax: 208.334.2774

Idaho State Museum:
610 Julia Davis Dr.
Boise, Idaho 83702
208.334.2120

**Idaho State Archives
and State Records
Center:**
2205 Old Penitentiary Rd.
Boise, Idaho 83712
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**State Historic
Preservation Office:**
210 Main St.
Boise, Idaho 83702
208.334.3861

**Old Idaho Penitentiary
and Historic Sites:**
2445 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2844

HISTORY.IDAHO.GOV

5 March 2018

Noelle Shaver
366 CES/CEIE
Mountain Home Air Force Base
1030 Liberator Street
Mountain Home Air Force Base, Idaho 83648

**Re: Urban Close Air Support Air and Ground Training
SHPO# 2018-384**

Dear Ms. Shaver:

Thank you for consulting with our office on the above referenced project. We understand the scope of work includes simulated urban combat training exercises in several locations throughout southern Idaho.

After reviewing the project submittal dated 6 February 2018, we concur that the proposed undertaking has no potential to cause effects to historic properties. Pursuant to 36 CFR 800.3(a)(1), Mountain Home Air Force Base has no further obligations under Section 106 of the National Historic Preservation Act relative to this undertaking.

If you have any questions or the scope of work changes, please contact me via phone or email at 208.488.7468 or matt.halitsky@ishs.idaho.gov.

Sincerely,

Matthew Halitsky, AICP
Historic Preservation Review Officer
Idaho State Historic Preservation Office

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E

NOHDs for Laser
Designating Technologies



Attachment 1. Safety Information for USAF and Non-USAF Laser Systems

Table 1-1. Safety Data for USAF Laser Systems

Laser System	Mode	Wavelength (nm)	Unaided NOHD (km)	7X50 Binoculars NOHD (km)	12-cm Optics NOHD (km)	Buffer Angle (mrad)	Unaided OD	Aided OD	Platform type
AC-130U ALLTV	Designator	860	0.28	1.64	8.37	5.00	3.00	2.90	Fixed Wing
AC-130U LIA	Illuminator	807	0.10	0.70	1.64	5	3.3	5.2	Fixed Wing
AC-130U LTD/RF	Combat	1064	3.10	18.00	29.00	5	0.8	3.4	Fixed Wing
ACP-2	Pointer	836	0.00	-	-	10	1.9	-	Man Transportable
ACP-2A	Pointer	800-850	0.14	0.97	2.25	10	2.2	2.2	Man Transportable
ACP-2B	Pointer	836	0.16	0.93	2.20	10	2.5	2.3	Man Transportable
AIM-1/D	Pointer	800-850	0.08	0.46	-	10	1.7	1.7	Man Transportable
AIM-1/DLR	Pointer	830	0.24	1.56	3.55	10	2.5	2.5	Man Transportable
AIM-1/EXL	Pointer	800-850	0.09	0.68	1.60	10	1.7	1.7	Fixed Wing
AIM-1/EXL/MLR	Pointer	830	0.09	0.68	1.60	10	1.7	1.7	Man Transportable
AIM-1/MLR	Pointer	800-851	0.09	0.68	1.60	10	1.7	1.7	Rotary Wing
AN/AAQ-28 LITENING GEN 4/SE	Combat	1064	26.62	63.40	86.16	5	4.8	5.6	Fixed Wing
AN/AAQ-28 LITENING GEN 4/SE	Marker	804	0.25	1.41	3.23	5	2.8	2.7	Fixed Wing
AN/AAQ-28 LITENING GEN 4/SE	Training	1570	0.17	1.06	2.46	5	0.8	2.4	Fixed Wing
AN/AAQ-14 LANTIRN	Combat	1064	20.50	146.00	352.00	5	4.0	5.4	Fixed Wing
AN/AAQ-14 LANTIRN	Training	1540	0.00	0.18	0.58	5	0.0	1.2	Fixed Wing
AN/AAQ-16D AESOP	Designator	1064	10.00	36.00	-	10	5.1	5.1	Rotary Wing
AN/AAQ-22 NTIS (UH-1N)	Designator	1064	0.72	4.00	8.60	5	4.1	5.3	Rotary Wing
AN/AAQ-24 LAIRCM	SLTA (1x)	950-10600	0.04	0.19	-	5	2.5	2.5	Fixed Wing
AN/AAQ-24 LAIRCM	SLTA (2x)	950-10600	0.06	0.26	-	5	2.5	2.5	Fixed Wing
AN/AAQ-24 LAIRCM	GLTA (1x)	950-10600	0.04	0.16	-	5	2.5	2.5	Fixed Wing
AN/AAQ-24 LAIRCM	GLTA (2x)	950-10600	0.05	0.22	-	5	2.5	2.5	Fixed Wing
AN/AAQ-28 LITENING II	Designator	1064	12.00	43.00	69.00	5	4.1	5.4	Fixed Wing
AN/AAQ-28 LITENING II	Marker	808	0.19	1.33	3.07	5	2.6	2.9	Fixed Wing
AN/AAQ-33 ATP Sniper XR	Training	1570	0.00	0.60	1.47	2	0.0	1.5	Fixed Wing
AN/AAQ-33 ATP Sniper XR	Marker	804	0.25	1.41	3.23	2	2.8	2.7	Fixed Wing
AN/AAQ-33 ATP Sniper XR	Combat	1064	15.60	44.80	65.00	2	3.9	5.3	Fixed Wing
AN/AAQ-33 ATP-SE	LTM	808	1.22	6.32	-	5	1.9	3.1	Fixed Wing
AN/AAQ-33 ATP-SE	Tactical	1064	21.70	55.14	-	5	3.9	5.3	Fixed Wing
AN/AAQ-33 ATP-SE	Training	1570	0.00	1.48	-	5	0.0	1.6	Fixed Wing
AN/AAQ-39 CLDR (AC-130U)	Combat	1064	20.42	54.34	-	5	4.0	5.2	Fixed Wing
AN/AAQ-39 CLDR (AC-130U)	Training	1570	0.00	0.00	-	5	0.0	0.0	Fixed Wing
AN/AAQ-39 CLDR (AC-130U)	Alignment	830	0.46	2.86	-	5	0.8	1.3	Fixed Wing
AN/AAQ-39 GMS-2 (AC 130U)	Tactical	1064	17.65	48.65	69.43	2	4.1	5.4	Fixed Wing
AN/AAQ-39 GMS-2 (AC 130U)	Training	1570	0.00	0.00	0.24	2	0.0	0.2	Fixed Wing
AN/AAQ-39 GMS-2 (AC 130U)	Marker	860	0.28	1.60	3.65	2	3.0	2.9	Fixed Wing
AN/AAQ-40 EOTS (F-35)	"CONTACT THIS OFFICE"								
AN/AAS-37 (OV-10D NOS)	Designator	1064	11.20	45.00	59.00	5	5.2	5.6	Fixed Wing
AN/AAS-44 LAMPS (UH-1N)	Rangefinder	1064	19.97	52.67	78.11	5	4.1	5.3	Rotary Wing
AN/AAS-44 LAMPS (UH-1N)	Designator	1064	22.36	56.67	82.73	5	4.3	5.4	Rotary Wing
AN/AAS-52 MQ-1 Predator MTS	LRD	1060	39.07	81.29	105.70	2	4.3	5.4	Fixed Wing
AN/AAS-52 MQ-1 Predator MTS	LTM	850	0.31	1.79	4.06	2	2.9	2.9	Fixed Wing
AN/AAS-52 MTS-A Firefly	Illuminator	532	1.05	6.28	12.88	2	4.1	4.1	Fixed Wing
AN/AAS-52 MTS-A Firefly	Illuminator	1064 RLE	1.05	6.28	12.88	2	1.5	1.5	Fixed Wing
AN/AAS-52 MTS-A Firefly	Illuminator (Hi-Beam Laser System w/ 1.1 mrad Divergence)	532	0.20	1.29	2.97	5	2.5	2.5	Fixed Wing
AN/AAS-54 MTS-A (HC-130J and MC-130J)	Rangefinder	1540	0.00	0.00	0.00	2	0.0	0.0	Fixed Wing
AN/AAS-54 MTS-A (HC-130J and MC-130J)	LTM	860	0.27	1.53	3.56	2	2.6	2.7	Fixed Wing
AN/AASQ-36 Star SAFIRE II (MC-130H)	Pointer/Illuminator	830	0.36	2.06	4.62	5	2.2	2.0	Fixed Wing
AN/AAT-3A (AC130H) PAVE SPECTRE	Illuminator	860	0.79	0.55	1.34	5	3.3	5.2	Fixed Wing
AN/ASQ-153 Pave Spike (F-4E)	Designator	1064	10.00	20.42	-	5	4.2	5.6	Fixed Wing
AN/AVQ-19/19A CLDR (AC-130H)	Training	1570	0.00	2.29	5.40	5	0.0	1.6	Fixed Wing
AN/AVQ-19/19A CLDR (AC-130H)	Tactical	1064	28.10	65.70	88.60	5	3.7	5.3	Fixed Wing
AN/DAS-1A MQ-9 Reaper MTS-B	LRD	1060	46.61	91.26	116.47	5	3.8	5.4	Fixed Wing
AN/DAS-1A MQ-9 Reaper MTS-B	LTM	860	0.32	1.83	4.14	5	3.0	2.9	Fixed Wing
AN/GAQ-T1 LD82LB	Designator	1064	12.50	38.00	52.00	5	4.6	5.5	Man Transportable
AN/GVS-5	Rangefinder	1064	2.70	13.00	27.00	10	3.7	4.4	Man Transportable
AN/KAX-1A MARFLIR Pointer	Pointer	820- 840	0.64	4.00	8.20	5	2.5	2.5	Vehicle Mounted (ground-to-ground)
AN/MAD-1 HPMF	Pointer	830	0.68	3.74	9.14	5	2.5	2.3	Vehicle Mounted
AN/MAD-1 HPMF	Rangefinder	1540	0.00	0.00	0.00	5	0.0	0.0	Vehicle Mounted
AN/PAQ-1 LWLD	Designator	1064	7.00	15.00	43.00	10	4.2	5.8	Man Transportable

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