



## WILDERNESS WATCH

*Keeping Wilderness Wild*

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January 31, 2020

Holloman ADB Airspace EIS  
c/o Cardno  
501 Butler Farm Road  
Hampton, VA 23666

Submitted electronically online and via US Mail

RE: Comments on the draft Environmental Impact Statement on Special Use Airspace Optimization Project, Holloman Air Force Base

Dear Project Managers:

Wilderness Watch submits the following scoping comments on the draft Environmental Impact Statement for the Special Use Airspace Optimization Project, Holloman Air Force Base. Wilderness Watch is a national wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. Wilderness Watch has nearly 60,000 members and supporters, many of whom live in New Mexico and near the areas affected by the proposed flights. Wilderness Watch believes the proposal would have serious impacts to the Gila, Aldo Leopold, Apache Kid, Withington, Bosque del Apache, Sierra de las Uvas, Broad Canyon, and Robledo Wilderness. We also submitted comments on the scoping proposal and have attached them to this comment. We're disappointed that the DEIS has failed to address most of the concerns we raised in our scoping letter.

### **Inadequate Wilderness Evaluation**

The Maps in the DEIS show the expansion would include the following Wildernesses: Gila, Aldo Leopold, Apache Kid, Withington, Bosque del Apache, Sierra de las Uvas, Broad Canyon, and Robledo. Other Wildernesses are near the boundaries of these including the Peloncillo Mountains Wilderness, which appears to have been mistakenly identified as the Galiuro Wilderness.

The analysis and DEIS exclude the Sierra de las Uvas, Broad Canyon, and Robledo Wildernesses administered by the BLM. They are in the

proposed Kendra ATCAA (see figure ES-2). Omitting these Wildernesses renders the analysis inadequate.

Further, the cumulative impacts of the proposed expansion on Wilderness are not adequately considered. The cumulative impact analysis (see page 5-9) does not explicitly recognize the cumulative harm to the National Wilderness Preservation System or the Wildernesses affected by existing MOAs including, but not limited to, the Reserve and Morenci MOAs. These two MOAs include a portion of the Gila Wilderness and the Blue Range, Escudilla Mountain, Mount Baldy, and Bear Wallow Wildernesses. Other Wildernesses in the region such as the White Mountain and Capitan Wildernesses may already be negatively affected by military flights from Holloman Air Force Base but are not mentioned in the DEIS. Carlsbad Caverns and Guadalupe Mountains National Parks are mentioned in the DEIS, but it does not acknowledge that portions of both are designated as Wilderness).

While there is an analysis, mainly of sound impacts, to some of the Wildernesses, it fails to look at how the Wildernesses as a whole are affected. Our scoping comments addressed this issue in some detail. Yet even with just a cursory analysis, the tables on pages 4-25 and 4-27 show significant impacts to the soundscape of Wildernesses from the proposed action.

Another major problem with the proposal that doesn't receive adequate analysis in the DEIS is the use of chaff and flares, that could land in Wilderness. Dropping materials from aircraft into Wilderness would violate the Wilderness Act and its supporting regulations. For example, Forest Service regulations 36 CFR § 261.18 (c) prohibits not only landing of aircraft, but also "dropping or picking up of any material" by aircraft. Similarly, 36 CFR § 293.6 states "there shall be in National Forest Wilderness" ... "no dropping of materials" from "aircraft." BLM regulations are similar and prohibit anyone to "drop ... any material ... by means of aircraft." (43 CFR Subchapter F, part 6302.20(e)). Dropping of chaff and flares would clearly violate these regulations. As such, the proposal to use chaff or flares in a manner where they would land in Wilderness is a violation of the Wilderness Act.

## **NEPA**

Our attached scoping comments addressed these issues. In addition, the purpose and need for the proposal needs to be clearly articulated. The DEIS itself admits, "the current SUA used by Holloman AFB is adequate" then continues to say the Air Force still wants to expand. Instead of a real need, it seems to be a desire for expansion. Already, much of the West is within MOAs and that use has expanded greatly. This seems to be a case of the tail wagging the dog. No real need has been articulated.

## **Summary**

The DEIS is seriously flawed in its analysis of impacts to Wilderness, including cumulative impacts to a significant portion of the National Wilderness Preservation System in New Mexico, Arizona, and Texas. There is no real purpose and need for expansion expressed in the DEIS.

Please keep us updated on this issue.

Sincerely,

A handwritten signature in black ink, reading "Gary Macfarlane". The signature is written in a cursive, flowing style.

Gary Macfarlane  
Board Member