

United States Air Force Scoping Comment Form Environmental Assessment



Please record your comments on this form to let U.S. Air Force and Cannon Air Force Base (AFB) know what environmental factors you want considered in the development of an Environmental Assessment (EA) addressing the potential environmental consequences from establishing a low altitude tactical navigation (LATN) area in northern New Mexico and southern Colorado. You may submit your comments by:

- 1) Email to: 27SOWPublicAffairs@cannon.af.mil or
- 2) Mailing this form to:

Cannon AFB Public Affairs Office
110 E Sextant Avenue, Suite 1150
Cannon AFB, NM 88103

All comments must be postmarked or received by November 15, 2010, to be considered in the Draft EA.

Public comments are requested pursuant to the National Environmental Policy Act (NEPA), 42 USC 4321, et seq. All written comments received during the comment period will be considered during Draft EA preparation. Your provision of private address information with your comment is voluntary. Your private address information will not be released in the Draft EA or for any other purpose, unless required by law. However, your private address information will be used to compile the mailing list for the Draft EA distribution. Failure to provide such information will result in your name not being included on the distribution list.

Name: Lynn Padgett, Chair

Organization/Affiliation: Ouray County Board of County Commissioners, Ouray County, Colorado

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Comments:

Please see the following pages for comments.

Visit www.cannon.af.mil for project information and to download a copy of this comment form.

*Provide your mailing address to receive future notices about the Cannon AFB LATN EA.



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COMMISSIONERS

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November 8, 2010

Cannon AFB Public Affairs Office
110 E. Sextant Avenue, Suite 1150
Cannon AFB, NM 88103

via email: 27SOWPublicAffairs@cannon.af.mil

To Whom It May Concern:

The Ouray County, Colorado, Board of County Commissioners (BOCC) is aware of citizen comments and concerns regarding the proposed expansion of Low-Altitude Training Navigation (LATN) exercises proposed for Southern Colorado and New Mexico. The BOCC understands from the Air Force, that the stated objective would be low-level night-time training in high-altitude mountainous terrain, proximal to Cannon AFB where aircrews are challenged to keep the aircraft on the proper time schedule and course while avoiding simulated threats. The BOCC also understands that the proposed LATN area would be used by the 27th Special Operations Wing (27SOW), based at Cannon AFB to perform/accomplish Special Operations Forces (SOF) mobility training requirements. The BOCC understands that the SOF mobility capability is considered to be a unique, national asset and proficiency at these skills will give our Service members the specialized training required for successful operations in ongoing global conflicts.

From communications with Colonel Clark (November 5, 2010), the BOCC understands that there would be no weapons or ammunition aboard the aircraft. Colonel Clark has communicated that the Air Force will be avoiding people, buildings, and vehicles during the training exercises. Colonel Clark has advised that during these low level exercises, aircraft will be scanning for the highest terrain and set their clearance planes such that they may crest ridgelines or high points at the minimum 200-foot altitude, but that much of the mission will be flown at 500 to 1,000 feet above ground level. The BOCC is aware that the LATN proposal will allow aircraft to be 300 feet closer to the ground than current exercises within the National Airspace, which allow aircraft to be within 500 feet of ground level. From communications with Colonel Clark, the BOCC understands that the EA should be completed in 9 to 12 months. Meanwhile 27SOW will be receiving and deploying 4 CV-22 aircraft in May, using the National Airspace or existing Military Training Routes. The C-130s will be arriving in August 2011 and 2012.

We appreciate the outreach performed by the Air Force and 27SOW related to this proposal and appreciate the opportunity to provide preliminary comments. Our comments are not aimed at opposing or endorsing the LATN, but to help the 27SOW know about special characteristics of Ouray County, so they can be addressed in the forthcoming Environmental Assessment (EA). We believe that 27SOW can accomplish its goals with quality missions that are sensitive to the characteristics and resources of Ouray County.

For example: Ouray County's economy is largely based on outdoor recreational tourism and backcountry experiences, as well as ranching. The National Forest, wilderness areas, and public lands provide remote and wild for backcountry hikers, skiers, 4-wd vehicles, and hunters. Severe winter habitat areas for big game are critical to their survival and relate to the number of tags issued to hunters within our game units.

Ouray County has 2 municipalities, the City of Ouray and Town of Ridgway. In addition within the unincorporated areas of the County, more densely populated areas exist within the southern portion of Log Hill Mesa, at the base of the mesa in Pleasant Valley, and along the Uncompahgre River, generally within 4 miles of Ridgway and Ouray.

We request that the EA specifically identify and address potential impacts or mitigation to the following:

1. **Ranching activities.** Please consult with public lands agencies about the locations of grazing allotments and whether there are potential impacts to livestock, mainly cattle, horses, and sheep. These may be more critical on ridgelines and mesa tops.

2. **Wilderness boundaries.** Please consult with public lands agencies and our Congressional representatives, including Congressman Salazar, Senator Bennet and Senator Udall regarding the boundary of the proposed wilderness expansion contained in the San Juan Wilderness Bill. This boundary is different than the current Mount Sneffels Wilderness Boundary, and also affects lands in San Miguel County. The San Juan Region also contains several Wilderness Study Areas (WSAs) which are managed similar to wilderness. The BOCC is interested in WSAs being buffered and treated by 27SOW as wilderness.

3. **Potential for triggering avalanches.** Due to the rugged features of our backcountry, and extreme backcountry enthusiasts, we have dispersed recreation (backcountry skiers and campers) present in remote and high locations, even in the winter. There are several local guiding companies, as well as our public lands agencies, that would be able to give detailed information about the most popular areas for snow campers and hut trip use. The Center for Snow and Avalanche Studies in Silverton is a good resource for avalanche statistics, paths and avalanche forecasting. Our concern is whether the aircraft would be able to trigger an avalanche, especially while approaching or cresting ridgelines at low altitude where prone paths exist.

4. **Big game and wildlife sensitivity.** Please consult with the Colorado Division of Wildlife and other appropriate agencies regarding elk, deer, big horn sheep and lynx birthing areas, nesting areas, severe winter habitat, or other wildlife activity areas which could be impacted by the LATN seasonally.

5. **Potential for wildfire starts.** A significant wildfire could be devastating to our livelihoods and our County's financial resources for a prolonged period. Please address the potential for sparks from low-altitude aircraft to ignite a wildfire, as well as an emergency response plan and reimbursement plan should an accident cause a wildfire.

6. **Emergency response and coordination.** Similar to adjacent counties, the BOCC would like to have a clear communication plan between dispatch, sheriff, and emergency coordinators and the Air Force. The Mountain Rescue team and Sheriff's Department occasionally deploy medical and search/rescue aircraft to respond to incidents. Public lands agencies also conduct controlled burns in our region. Lightning strikes occur frequently during the summer monsoon season and may ignite wildfires. Please be clear about how the Air Force should learn about evolving conditions or civilian incidents which may impact a 27SOW mission or flight plan. The Ouray County BOCC is open to working with the Air Force through an MOU.

7. **Noise impacts.** The BOCC requests that concrete data be gathered about the potential noise from aircraft. Will aircraft noise be amplified or diminished by the narrow valleys lined with rock outcrops? Will it be amplified or diminished in winter with significant snow on the ground? Will noise impacts be able to impact the same point more than once a night? The BOCC understands that a single point will only be flown over a maximum of once per night—but will sound from other flight paths impact the same location more than once per night and to what extent?

The BOCC thanks the 27SOW for allowing the opportunity for preliminary comments. If there is anything we can provide to the Air Force to assist in the information gathering process for the EA, please let us know. Ouray County citizens have a long tradition of supporting our troops and serving in the military. We hope that by providing the above comments we can help the 27SOW work with our County to accomplish their important military goals without significant impacts to our citizen's livelihoods, pursuit of outdoor recreational activities, our natural resources, livestock and wildlife, and without worrying about incurring expenses from increased emergency wildfire or avalanche responses.

Respectfully,



Lynn Padgett
Chair, Ouray County Board of County Commissioners

pc: Senator Udall, Senator Bennet, Congressman Salazar, Colorado Counties, Inc., Club 20