



C

Draft EIS Public
Comments



Comment Correspondences from Government Agencies

From the Federal Emergency Management Agency, Region 6

U.S. Department of Homeland Security
FEMA Region 6
800 N. Loop 288
Denton, TX 76209



FEMA

Chinling Chen, DAF
Project Manager
Air Force Civil Engineer Center, NEPA Division
2261 Hughes Avenue, Suite 155
Joint Base San Antonio Lackland, Texas 78236-9853

RE: Draft Environmental Statement (EIS) for the TA-7 Recapitalization at Laughlin Air Force Base (AFB)

Dear Chinling Chen,

We acknowledge receipt of your request for review/environmental consultation in reference to the Draft Environmental Statement (EIS) for the TA-7 Recapitalization at Laughlin Air Force Base (AFB).

We have no comments to offer.

We offer the following comments:

We would request that the community Floodplain Administrator be contacted for the review and possible permit requirements for this project. If federally funded, we would request the project maintain compliance with EO 11988 & EO 11990.

The Community Floodplain Administrator for your project contact information is listed below:

City of San Antonio, TX
Sabrina Santiago
Storm Water Capital Prog. Mgr.
100 West Houston Street, 15th Floor
San Antonio, TX 78205
sabrina.santiago@sanantonio.gov
(210) 207- 0182

REVIEWER:
Loukisha Williams
Floodplain Management and Insurance Branch
Mitigation Division
(940) 383-7228

DATE: 11/15/2023

www.fema.gov

From the Texas Commission on Environmental Quality

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janicka, *Commissioner*
Kelly Keel, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 22, 2023

Chinling Chen, DAF
Project Manager
Air Force Civil Engineer Center
NEPA Division
2261 Hughes Avenue, Suite 155
JBSA-Lackland, TX 78236

Via: **E-mail**

Re: **TCEQ NEPA Request #2024-037. LAUGHLIN AFB T-7A RECAPITALIZATION EIS. Val Verde County.**

Dear Mr. Chen,

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments:

The proposed action is located in Val Verde County, which is currently designated attainment/unclassifiable for the National Ambient Air Quality Standards for all six criteria air pollutants. Federal Clean Air Act, §176(c) general conformity requirements do not apply for this action.

We are in support of the project. The environmental assessment addresses issues related to surface and groundwater quality.

The management of industrial and hazardous waste at the site including waste treatment, processing, storage and/or disposal is subject to state and federal regulations. Construction and Demolition waste must be sent for recycling or disposal at a facility authorized by the TCEQ. Special waste authorization may be required for the disposal of asbestos containing material.

Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA coordinator at (512) 239-5538 or NEPA@tceq.texas.gov

Sincerely,

A handwritten signature in black ink, appearing to read "R. Vise".

Ryan Vise,
Division Director
External Relations

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-0010 • tceq.texas.gov

How is our customer service? tceq.texas.gov/customersurvey

printed on recycled paper

From the Texas State Historic Preservation Officer

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>
Sent: Tuesday, December 12, 2023 10:21 AM
To: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE <chinling.chen@us.af.mil>; reviews@thc.state.tx.us
Subject: [Non-DoD Source] DAF EIS T-7A Recapitalization



Re: Project Review under Section 106 of the National Historic Preservation Act
THC Tracking #202402486
Date: 12/12/2023
DAF EIS T-7A Recapitalization
Laughlin AFB
Del Rio, TX

Description: Draft Environmental Impact Statement for the T-7A Recapitalization at Laughlin AFB.

Dear Chinling Chen:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Tiffany Osburn, Caitlin Brashear and Patrick Bassett, has completed its review and has made the following determinations based on the information submitted for review:

We have the following comments: The Texas Historical Commission Division of Architecture review staff led by Patrick Bassett thanks the Air Force for allowing us to review this Draft Environmental Impact Statement.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers:

tiffany.osburn@thc.texas.gov, caitlin.brashear@thc.texas.gov, patrick.bassett@thc.texas.gov.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,

for Mark Wolfe, State Historic Preservation Officer
Executive Director, Texas Historical Commission

Please do not respond to this email.

From the U.S. Environmental Protection Agency, Region 6



REGION 6

DALLAS, TX 75270

December 26, 2023

VIA Electronic Mail

Chinling Chen, AFCEC/CZN
Attn: Laughlin AFB T-7A Recapitalization EIS
Headquarters Air Education and Training Command Public Affairs
100 H. East Street, Suite 4
Randolph AFB, Texas 78150
chinling.chen@us.af.mil

Subject: Recapitalization with T-7A Red Hawk aircraft and flight operations at Laughlin Air Force Base, Texas

Dear Mr. Chen:

The U.S. Environmental Protection Agency (EPA), Region 6, has reviewed the United States Air Force (USAF) Draft Environmental Impact Statement (EIS) (CEQ No. 20230154) for the recapitalization with T-7A Red Hawk aircraft and flight operations at Laughlin Air Force Base, Texas. Recapitalization would entail introduction of T-7A aircraft and flight operations at Laughlin AFB and associated special use airspace (SUA) to replace all T-38C aircraft assigned to the installation; changes to the number of personnel and dependents in the Laughlin AFB region; and construction and upgrade of operations, support, and maintenance facilities.

The Draft EIS was reviewed pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500 – 1508), and EPA's authority under Section 309 of the Clean Air Act.

The following comments are offered for consideration in finalizing the EIS:

Water Quality Comments

- **Revegetation of disturbed areas (to protect water quality)**
On page 3-124, USAF states that "temporarily disturbed sites [as a result of the proposed action] would be revegetated with native species following construction to support native plant community and restore wildlife habitat in the long term". EPA appreciates that healthy native vegetation not only supports wildlife but also serves to reduce soil erosion and stormwater runoff. We ask that the Final EIS explain how the USAF plans to revegetate the disturbed areas with native plants. The plan should provide a written protocol to be followed and explain how long-term success will be measured. To best support this objective, EPA recommends reseeding the disturbed areas as soon as practicably possible using native seed mixes designed for the West Texas

habitat (also called Desert Southwest Rangelands). EPA further recommends that the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) be contacted for assistance in defining these proper mixes.

- **Polyfluoroalkyl Substances (PFAS) Concerns**

Laughlin AFB has an unlined stormwater drainage ditch (see page 3-103) which discharges into Sacatosa Creek and Zorro Creek, both of which eventually lead to the Rio Grande. The USAF states that the stormwater drainage ditch was exposed to PFAS pollution from the base's firefighting training center (page 3-96). Please identify measures to be implemented to prevent future PFAS pollution to waterbodies on or near the base.

Clean Water Act (CWA)

Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) permitting requirement to authorize the discharge of stormwater from construction activities in areas upland from a waterbody and not considered a jurisdictional wetland area. Sections 1.3 and 3.4 of the Draft EIS identifies the demolition, abatement, reconfiguration, installation construction, and reconstruction elements of the project. Section 4.11 of the Draft EIS explains how stormwater runoff from the proposed project are managed under its industrial stormwater permit (Multi-Sector General Permit program), the CWA Section 402 NPDES regulations to discharge stormwater from industrial operations [40CFR 122.26(b)(14)].

Although Section 4.11 of the Draft EIS includes CWA and NPDES regulatory background information, there is no information (i.e., permit coverage requirements, stormwater pollution prevention plan, overall earth-disturbance, etc.) to address 40 CFR 122.26(b)(15)(i) compliance requirements with the CWA Section 402 NPDES regulations. This includes the discharges of stormwater from construction activities and construction support activities (i.e., borrow pits, staging areas, material storage areas, etc.).

Specific components of project related activities include:

- Construction of an approximately 34,000 square feet (SF) ground-based training system facility and construction of a parking lot for approximately 106 vehicles across Laughlin Drive.
- Construction of an approximately 11,500 SF aircraft unit maintenance trainer facility. Figure 2-3 also depicted construction of a mech yard, dumpster pad, sidewalk & road although earth disturbance for these activities did not appear to be addressed in the document.
- Construction of a new hush house which will include demolishing a Building 15 breakroom and extending approach pavements and supporting utilities. Additionally, the airfield service road north of the site would be realigned to the northwest however earth disturbance for these activities did not appear to be addressed in the document.
- Construction of an approximately 3,400 SF addition to the egress shop, Building 201.
- Construction of an approximately 7,200 SF concrete pad for a storage container to store T-7A ejection system explosive components.

Under 40 CFR 122.26(b)(15)(i) NPDES regulations, all operators of construction activities causing an earth disturbance of 1 acre or greater, or less than one acre if part of a larger common plan of development or sale that ultimately disturbs 1 acre or greater, are required to develop a stormwater pollution prevention plan (SWPPP) and obtain NPDES permit coverage via the Construction General Permit (CGP) or other NPDES permits prior to beginning construction activities and/or construction support activities. Because the overall earth disturbance of this project is greater than 1 acre, stormwater discharges from construction activities are required to obtain NPDES permit coverage via the CGP or other NPDES permits.

In Texas, the NPDES permitting authority is the Texas Commission on Environmental Quality (TCEQ), except on Indian Country. As such, we ask that the Final EIS include discussion demonstrating coordination with TCEQ providing assurances the NPDES permitting requirements will be satisfied as required.

Tribal and Environmental Justice Comments:

USAF states in the Draft EIS that “Long-term, less than significant, adverse impacts could occur from increased noise and air emissions from T-7A aircraft beginning operations in 2030. Three of the Census Block Groups affected from increased aircraft operations causing higher noise levels contain environmental justice populations. It is expected that there would be an increase in air emissions from some pollutants in the areas around the installation that include environmental justice populations.” The increased noise may increase classroom learning interference at nearby schools and are unavoidable. All the Alternatives could have a disproportionately adverse impact on environmental justice and sensitive receptor populations.

Since the USAF Draft EIS states the adverse impacts on environmental justice and sensitive receptor populations are unavoidable, EPA recommends USAF coordinate and engage with the environmental justice communities and its receptor populations. USAF should work toward developing mitigation measures and/or a plan to address noise above the threshold level and any related health issue resulting from increase air emission/air quality impact.

EPA appreciates the opportunity to review the Draft EIS. We look forward to the receipt of the Final EIS and Record of Decision (ROD). If you have any questions regarding our comments, please contact Michael Jansky, the lead reviewer, at jansky.michael@epa.gov or 214-665-7451.

Sincerely,

**Robert
Houston**

Digitally signed by
Robert Houston
Date: 2023.12.26
09:11:33 -06'00'

Robert Houston
Acting Director
Office of Communities, Tribes and
Environmental Assessment

Comments Made During Public Hearings

From Speaker 1 [speaker's initials intentionally omitted to protect their privacy]

Provided verbally at the in-person public hearing on December 5, 2023.

LT. COL. MUSSELMAN: So, Mr. [last name stated], could you please state your full name.

SPEAKER 1: [First and last name stated]

LT. COL. MUSSELMAN: And could you spell that for me.

SPEAKER 1: [Name spelled].

LT. COL. MUSSELMAN: And then did you indicate your affiliation, if any, of any organization for the record.

SPEAKER 1: No affiliation. Thank you.

LT. COL. MUSSELMAN: Very well, sir. You have three minutes for comments.

SPEAKER 1: My comment is I live right past the runaway on the south side. I have a lot of noise. My dogs and me can hardly hear anymore what is going on already. If this is going to be worse, it is going to be a problem. And the emissions are in the airspace and the ground space. And when the wind is blowing from the north I can't go outside because it smells like I sucked on a diesel exhaust pipe. As I looked at the clarification, there is a lot more noise at the Air Force base. I'm right there and there are going to be a lot more emissions. What can we do to protect ourselves when dealing with that kind of noise and emissions, because and also since this plane has only one engine what is the most chance of crashing on the bird strike in landing and more taking off. That's a more chance of bird strike than it is in the rare. I'm really concerned and I own 158 acres right off the runaway. And that seems a little bit dangerous for my life-style. I'd also like to know if they are going to expand the base at any time since I live right off the runaway. I'm really worried about where I live at. So any information that you guys can give me I'll give you my address, e-mail address and phone number. I would just like more information on understanding the noise and the emissions situation. And I think that covers everything I wanted to ask about. I appreciate the time. I appreciate the first one talking because it helped make it easier for me. Thank you very much.

LT. COL. MUSSELMAN: Thank you, sir. All right.

From Speaker 2

Provided verbally at the in-person public hearing on December 5, 2023.

- MR. F.: [First and last name stated, initials A.F.]
- LT. COL. MUSSELMAN: We have [first and last name]. Mr. [last name stated], could I have your speaker card here? A staff member will provide you with the microphone and you may provide your comments.
- MR. F.: Thank you. Mr. [prior speaker last name stated] asked most of the questions I was going to ask, but I don't know if this is related as well or not. Will it impact the employment of the Base if introduced to the new airplanes? That's all. Thank you.
- LT. COL. MUSSELMAN: Thank you, Mr. [last name stated]. As far as the purpose of the hearing, it is not a question and answer hearing. And so your question will be considered in the context of the Draft EIS. I encourage you to visit the EIS website or speak with the staff about receiving a copy of the Draft EIS and contents to see if it maybe provides answers to the questions you are asking. Anything additional?
- MR. F.: No. That's it.

From D.D.

Provided in writing at the in-person public hearing on December 5, 2023.



COMMENT FORM

T-7A RECAPITALIZATION AT LAUGHLIN AIR FORCE BASE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) DEIS PUBLIC COMMENT PERIOD

Comment Date: 12/05/2023

Please share your comments as part of the public comment period for the Department of the Air Force's **T-7A Recapitalization at Laughlin Air Force Base** Draft Environmental Impact Statement (EIS). Please provide comments in English and mail to the address provided on the back (use additional sheets as necessary). You may also submit comments by email to chinling.chen@us.af.mil or via the public website at <https://laughlin.T-7ANEPADocuments.com>. Please submit comments by January 8, 2024 to ensure the Department of the Air Force has sufficient time to consider your comment.

Please provide your comments in English below:

THE RECORDED BRIEF STATED THAT THE NOISE LEVELS FOR ALTERNATIVES 1 & 2 ARE ~~INSTE~~ NEGLIGIBLE. WILL THE AIR FORCE REACH OUT TO THE AFFECTED POPULATION THAT WOULD NOW ^{RESIDE} ~~BE~~ WITHIN THE 65 dBA DNL CONTOUR TO BEST INFORM THEM OF THE FUTURE CHANGES? @ SLIDE # 36 STATES THAT ENVIRONMENTAL JUSTICE WOULD BE IMPACTED FOR MINORITY/ECONOMIC POPULATIONS, HOWEVER THAT IT WOULD NOT BE SIGNIFICANT. IF THE EIS DID NOT DISCUSS WITH THE POPULATION AFFECTED, THIS MAY NOT BE A CORRECT ASSESSMENT.

Name:	[REDACTED]
Organization:	[REDACTED]
Address:	[REDACTED]
City:	[REDACTED] State: [REDACTED] Zip: [REDACTED]
Email:	[REDACTED]
Please check to be added to the mailing list for future notifications for this project:	<input checked="" type="checkbox"/> YES, I'd like to be added to the mailing list

Privacy Notice: Comments are requested in accordance with the National Environmental Policy Act, 40 CFR Parts 1500–1508, and 32 CFR Part 989. Written or verbal comments may be published in the Final EIS. As required by law, comments provided will be addressed in the Final EIS and made available to the public. Providing personal information is voluntary. Personal information will be used only to identify your desire to make a statement during the public comment period or to fulfill requests for copies of the Final EIS. Only the names of the individuals making comments and specific comments will be disclosed in the Final EIS; personal information will not be published in the Final EIS.

From M.S.

Provided verbally at the virtual public hearing on December 11, 2023.

MS. STOPPELMANN: We have one speaker in the que, [first name stated, initial M]. I will go ahead and send you a request to unmute now. [First name stated], you're unmuted --

MR. S.: Yeah --

MS. STOPPELMANN: -- yes.

MR. S.: Yes.

MS. STOPPELMANN: Okay. Go ahead.

MR. S.: Okay. I'm going to -- does it make any difference making a comment verbally here versus in writing via website?

MS. STOPPELMANN: All comments will be received in the comment period and reviewed by the team.

MR. S.: Okay. What -- why are we commenting here? Is it more impactful? I'm just trying to understand the motivation to make comments on the webinar versus in writing.

MS. STOPPELMANN: Writing multiple opportunities for public comment depending on the public's preferred method to comment on the EIS.

MR. S.: Okay. And just for -- I just want to reiterate again just in case. There's no question and answer possible here?

MS. STOPPELMANN: Confirmed. This is a moment for public comment, and, then, it will be received and responded to.

MR. S.: Okay.

MS. STOPPELMANN: -- following the public comment period. But not tonight.

MR. S.: Okay. I'll go ahead and start with my comment then. I do -- I -- I might mix my -- speech with this text to speech app because I have difficulty speaking at times. So it's just going to depend on my fluency. Anyways, so I -- what I wanted to say was there's going to be a substantially greater impact in the Big Bend region, especially in the park -- in east of the park because this is quite possibly the quietest place in the entire US and much of the world. And that's because there already is a very low amount of commercial -- you know what? My -- my speech is really getting really -- I'm just going to do text to speech here. -- and having the quietest sound state, noise -- impacts of this are greater than anywhere else in the country since a large portion of the Big Bend area has very little commercial aircraft. And combined with the existing military aircraft noise, it likely makes it the least aircraft noise impacted part of the country. As a result, the increased noise is more impactful and can't accurately be measured by

some average background noise measuring. Analogy, the loudness of a vacuum cleaner at 30 feet during a rock concert is extraordinary less than in a quiet forest. Conclusion. The existing background noise matters. Noise will interrupt the silence. That is absence of manmade noise. That can be achieved most consistently for long periods of time, such as thirty minute to one hour intervals and longer at night only in the Big Bend area comparatively to anywhere else in the US and much of the world. Noise will project well beyond boundaries of NRT. Noise will project even since the NRT terminates near the park and turning causes more noise. The cultural move towards sensory friendliness largely driven by increasing rates sensitive medical conditions, most notably autism. Given the Big Bend area has pockets with likely the lowest article noise in the US, it is an ideal sensory friendly area of land for people with noise sensitivity conditions to move to and to have it available for them. One recent example of this trend is one -- nationwide move to make sensory friendly hours on a daily basis. Okay. That's it.

MS. STOPPELMANN: Thank you for your public comment. I will go ahead and mute your line and return you back to the que.

LT. COL. MUSSELMAN: So just a moment. Sir, could you do me a favor? Could you please state your first and last name for me?

MR. S.: Yeah, [first and last name stated, initials M.S.]

LT. COL. MUSSELMAN: Can you go ahead and spell your last name, please?

MR. S.: Yeah, it's [Name spelled].

LT. COL. MUSSELMAN: All right. Thank you.

MR. S.: Okay.

Public Comments Received via the Project Website

From J.H.

Comment

Aircraft noise has absolutely been the worse thing that has happened to us. Jet liners, like a freeway day and night destroying our peace, our right to tranquility. FAA and congress rammed NEXTGEN through without environmental reviews and stated "they failed to take into consideration the impact to life below this atrocity". All lies. Jet liners polluting our marine sanctuary - Monterey Bay, CA. with carbon dioxide, oxides of sulphur and nitrogen, soot and heavy metals poisoning all who live under these flight plan making people and all life ill with noise and toxins. We already contend with 3 municipal airports all within 30 minutes of our area. This is torture! At night when we go to bed we hear the jetliners pummeling through every 3-5 minutes. FAA denies it's true. They throw intervals and decibles around and tell us we are NOT IMPACTED to silence us. The FAA refuses to budge even when better alternatives are available. They are an evil force.

From L.B.

Comment

Big Bend is one of the last sanctuaries for wide open spaces in Texas. Please don't destroy the last peaceful place we have to get away from all the noise with additional aircraft and at night when we enjoy the peace of a night sky and stargazing.

Public Comments Received via Email

From the Amphibian Refuge



Amphibian Refuge
11225 Morocco Road NE
Albuquerque, NM 87111
eric01nm@yahoo.com

November 14, 2023

Mr. Nolan Swick, AFCEC/CZN
Atty: JBSA T-7A Recapitalization EIS
Headquarters Air Education and Training Command Public Affairs
100 H. East Street, Suite 4
Randolph AFB, TX 78170
nolan.swick@us.af.mil

RE: Comment on Draft Environmental Impact Statement (DEIS) for T-7A Recapitalization at Laughlin Air Force Base (AFB)

Dear Mr. Swick:

Amphibian populations are declining worldwide, and amphibians are experiencing high extinction rates due to habitat loss, chytrid fungus, pollutants, pesticides, and climate change. Amphibians are the most threatened class of vertebrates and merit special attention in the T-7A Recapitalization. According to the DEIS, Laughlin AFB provides habitat for five amphibian species including Blanchard's cricket frog, green toad, Great Plains narrowmouth toad, Gulf Coast toad, and Rio Grande leopard Frog.

As stated in the EIS, impacts to amphibians would be reduced by avoiding or minimizing habitat reduction. It will be important to implement the best management practices (BMPs) described in the Laughlin AFB Spill Prevention Control and Countermeasure Plan (SPCC) to minimize water quality impacts, such as fuel releases, that would affect amphibians. We recommend designation of protected amphibian habitat areas and periodic monitoring of amphibian populations to ensure that activities at Laughlin Air Force Base do not reduce amphibian populations.

Thank you for this opportunity to comment.

Eric R. Johnson
Eric R. Johnson
President, Amphibian Refuge

References:

- Catenazzi, A. 2015. State of the World's Amphibians. *Annual Review of Environment and Resources*, 40: 91-119.
- Collins, J.P., and M.L. Crump. 2009. *Extinction in Our Times: Global Amphibian Decline*. New York, NY: Oxford University Press.
- Kolbert, E. 2014. *The Sixth Extinction, an Unnatural History*. New York, NY: Bloomsbury.
- McCallum, M.L. 2007. Amphibian Decline or Extinction? Current Declines Dwarf Background Extinction Rate. *Journal of Herpetology*, Volume 41, Number 3, pp. 483-491.

From M.S.

Email Message 1: December 4, 2023, M.S. to Justin Kirk

From: M.S. <Email Address Removed>

Sent: Monday, December 4, 2023 9:54 PM

To: KIRK, JUSTIN C CIV USAF AFMC AFCEC/CZN <justin.kirk.13@us.af.mil>

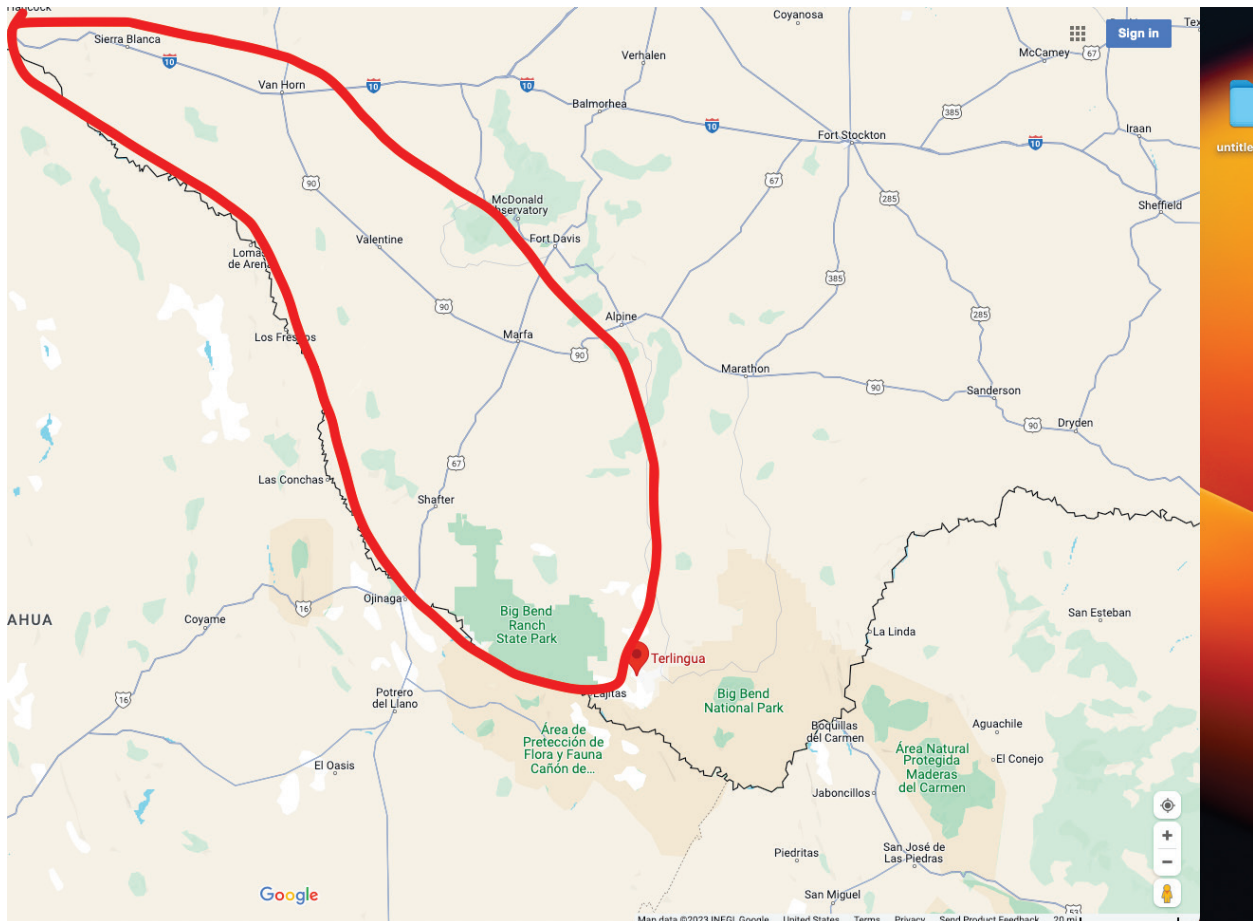
Subject: Re: [Non-DoD Source] Re: Response to - Nighttime flights over Southwest Texas, including the Big Bend area?

Hi,

Couple questions:

1) Referring to attached screenshot, are there currently any overnight training in the areas in the area circled in red? This is the area that is west of Big Bend National Park, South of Fort Davis, and east of Fort Hancock.

2) As far as the proposal draft EIS, will there be any overnight training above Big Bend National Park?



Email Message 2: December 5, 2023, M.S. to Chinling Chen

From: M.S. <Email Address Removed>

Sent: Tuesday, December 5, 2023 1:01 PM

To: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE <chinling.chen@us.af.mil>

Subject: [Non-DoD Source] Where is the public notice for the hearing and D-EIS?

Hi,

I did some searching for "Laughlin Air Force Base" on google news and there was nothing to be found in recent weeks about the public hearing or release of the draft environmental impact statement.

How do you expect the impacted communities to know that this is going on and that the DEIS has been released?

Additionally, since it impacts the national park, has there been any notices in the national park or from the national park that would reach the future visitor poll, such as social media pages for the national park?

--M.S.

Email Message 3: December 5, 2023, M.S. to Chinling Chen

From: M.S. <Email Address Removed>

Sent: Tuesday, December 5, 2023 1:03 PM

To: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE <chinling.chen@us.af.mil>

Subject: [Non-DoD Source] New training over national park at night? Existing overnight training west of park?

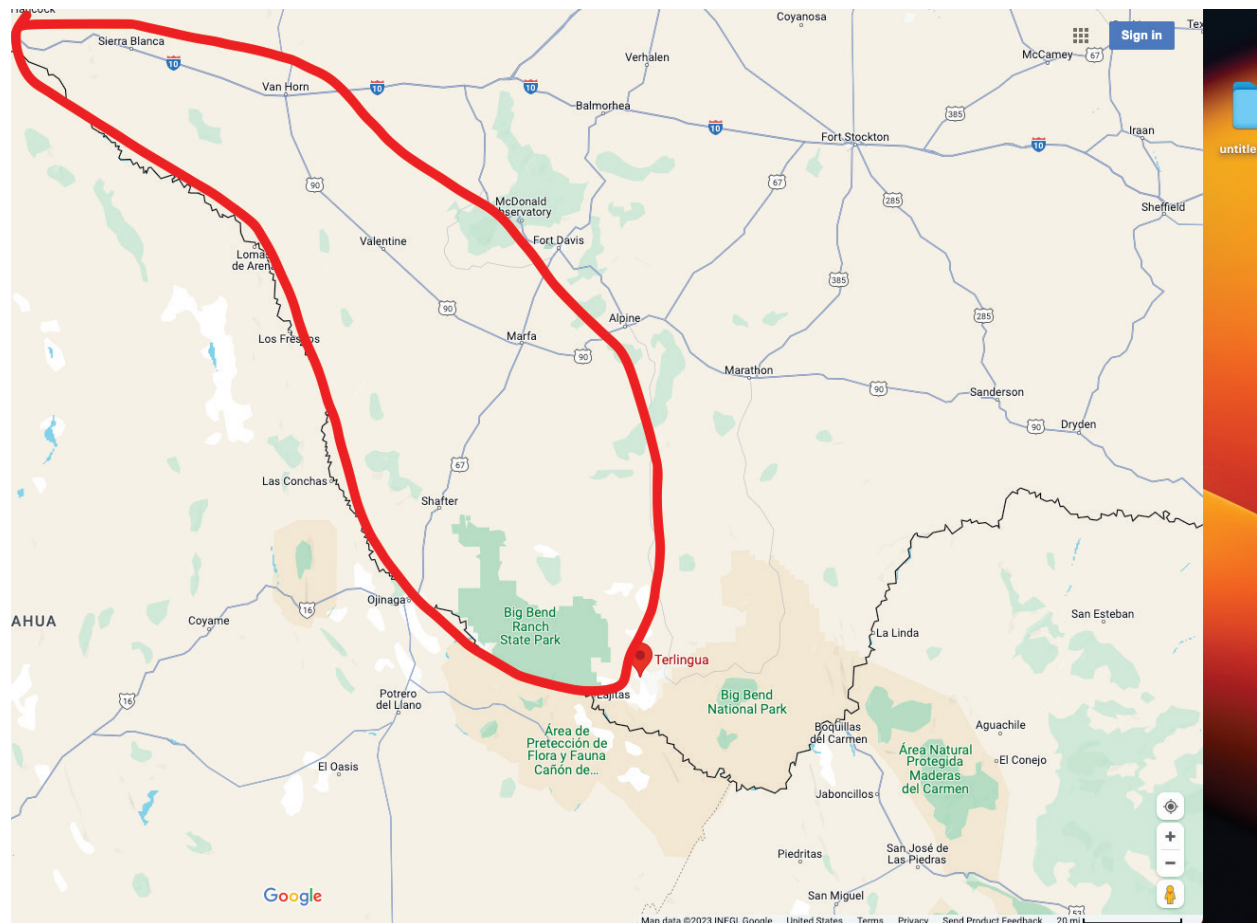
Hi again,

Couple more questions:

1) Referring to attached screenshot, are there currently any overnight training in the areas in the area circled in red? This is the area that is west of Big Bend National Park, South of Fort Davis, and east of Fort Hancock.

2) As far as the proposal draft EIS, will there be any overnight training above Big Bend National Park?

--M.S.



Email Message 4: December 6, 2023, M.S. to Nolan Swick

From: M.S. <Email Address Removed>

Sent: Wednesday, December 6, 2023 1:32 PM

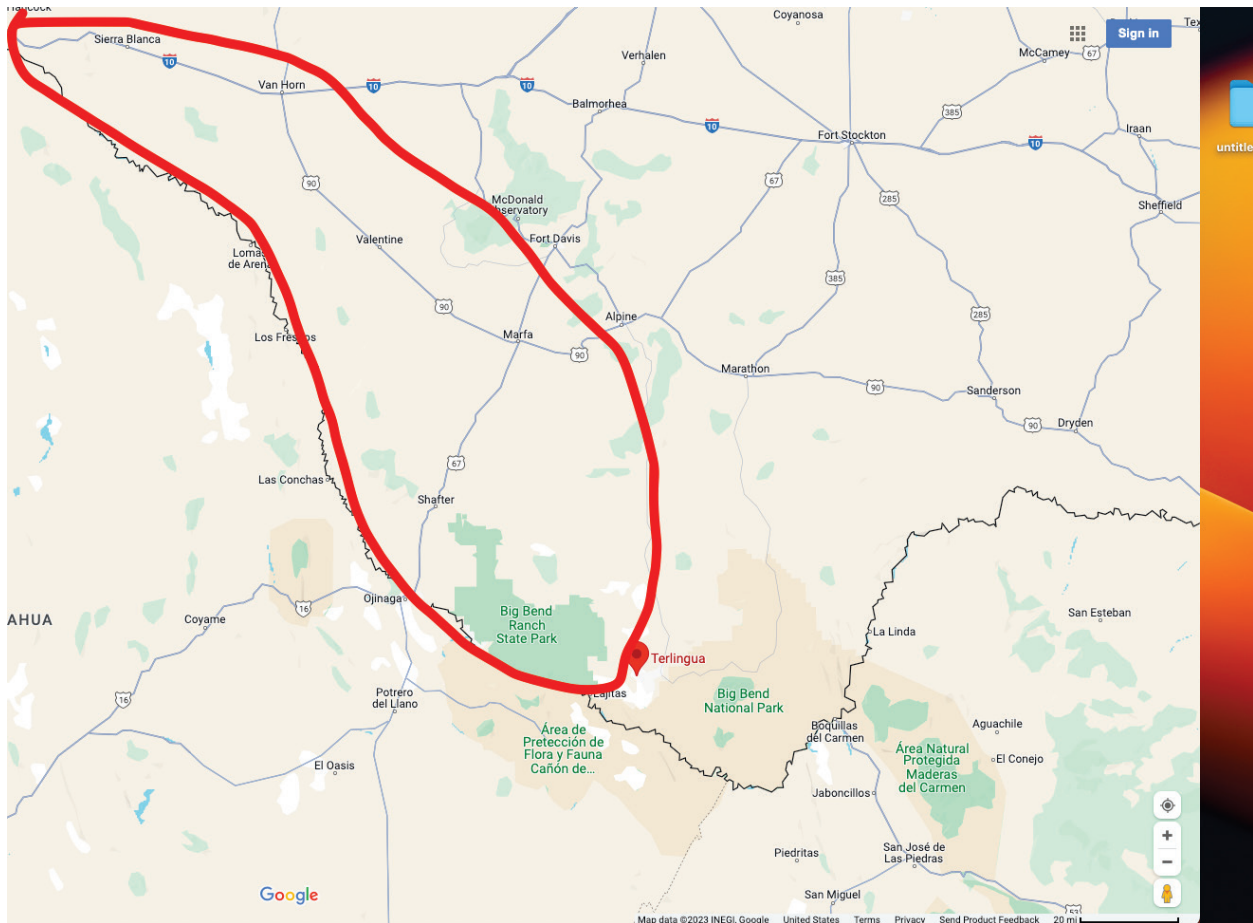
To: SWICK, NOLAN T CIV USAF AFMC AFCEC/CZCP <nolan.swick@us.af.mil>

Subject: [Non-DoD Source] New training over national park at night? Existing overnight training west of park?

Hi

1) Referring to attached screenshot, are there currently any overnight training in the areas in the area circled in red? This is the area that is west of Big Bend National Park, South of Fort Davis, and east of Fort Hancock.

2) As far as the proposal draft EIS, will there be any overnight training above Big Bend National Park?



Email Message 5: DAF Response to Email Message 2 – December 6, 2023

From: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE

Sent: Wednesday, December 6, 2023 3:34 PM

To: M.S. <Email Address Removed>

Subject: RE: [Non-DoD Source] Where is the public notice for the hearing and D-EIS?

Hello Mr. S., Thanks for your email.

If you googled “Laughlin Air Force Base”, you can see the “news” option within the base’s website. <https://www.laughlin.af.mil/News/News/>

This is where the information about the public hearing was posted.

Specifically : <https://www.laughlin.af.mil/News/News/Display/Article/3590657/daf-will-host-t-7-draft-environmental-impact-statement-public-hearings-for-laug/>

The public hearing information was also posted on the FB ran by the Base Public Affairs.

There were two ads placed on the local newspapers.

If you would like to attend the hearing, there is an upcoming virtual option on 12/11.

Registration is required: <https://laughlin.t-7anepadocuments.com/get-involved>.

Regarding your NPS questions, it required more analysis. These comments will be responded to in the Final EIS.

Take Care!

Chinling

VR,

//SIGNED//

CHINLING CHEN, GS-13, DAF

NEPA Program Manager, AFCEC/CI

Comm: (210) 395-0979

Cell: (210) 995-9961

chinling.chen@us.af.mil

Email Message 6: M.S. Response to Email Message 5 – December 6, 2023

From: M.S. <Email Address Removed>

Sent: Wednesday, December 6, 2023 8:28 PM

To: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE <chinling.chen@us.af.mil>

Subject: Re: [Non-DoD Source] Where is the public notice for the hearing and D-EIS?

Which newspapers? Do you have a picture of the ad and can it be viewed online?

As far "it required more analysis," are you referring to the public notice about changes in training over the National Park?

Also, were you able to find out for me about whether the existing training routes west of the park and south of Fort Davis, east of El Paso, have overnight training?

Thank you,

M.S.

Email Message 7: DAF Response to Email Message 6 – December 7, 2023

From: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE

Sent: Thursday, December 7, 2023 1:58 PM

To: M.S. <Email Address Removed>

Cc: DEL AGUILA, CHRISTINE L Capt USAF AETC 47 FTW_PA/PA

<christine.del_aguila@us.af.mil>; MULLEN, DUSTIN M TSgt USAF AETC 47 FTW/47 FTW/PA

<dustin.mullen.1@us.af.mil>

Subject: RE: [Non-DoD Source] Where is the public notice for the hearing and D-EIS?

Hello Mr. S., Thanks for your email.

We published in the 830 Times and the Del Rio & Eagle Pass News Leader. I have included a copy attached of the November 12th proof from the Del Rio & Eagle Pass News Leader. For 830 Times, the Newspaper can be accessed online at Del Rio's 830 Times - 830Times. The Ad is located on page 26-27 of the November 23rd and November 17th issue in English and Spanish. Both are attached here.

As I am not the technical expert at the base regarding the existing training route, I am not in a position to answer this question.

I am copying the base public affairs office, and they can better answer the existing training route question for you.

VR,

//SIGNED//

CHINLING CHEN, GS-13, DAF

NEPA Program Manager, AFCEC/CI

Comm: (210) 395-0979

Cell: (210) 995-9961

chinling.chen@us.af.mil



111723 830 TIMES
p26-27.pdf



112323 830 TIMES
p26-27.pdf



Ads.jpg

Email Message 8: M.S. Response to Email Message 7 – January 4, 2024

From: M.S. <Email Address Removed>

Sent: Thursday, January 4, 2024 10:24 PM

To: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE <chinling.chen@us.af.mil>

Subject: Re: [Non-DoD Source] Where is the public notice for the hearing and D-EIS?

These public notice are extraordinarily inaccessible and incomprehensible to the public, unless if they have some contextual background.

In fact, I'd bet that if you did a study and flashed this ad at someone for 5 seconds, just about all of them would not know what it's about.

The public doesn't know what T7A recapitalization and many don't even know Draft Environmental Impact statement entails or have even heard of that.

A proper public notice would convey the main points to the public in seconds. For example, a picture of a plane flying over the national park and other affected areas including unmissable summary phrases such as as "Air force new planes T7A," "Overnight training being proposed," "Increased training over the National Park."

As is, one would have to read the small print to even possibly understand the ramifications. The public has a right to know that this could affect their sleep, and park experience right away.

Also, it doesn't seem there has been any notice to potential park visitors .

--M.S.

Email Message 9: 2nd M.S. Response to Email Message 7 – January 4, 2024

From: M.S. <Email Address Removed>

Sent: Thursday, January 4, 2024 10:31 PM

To: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE <chinling.chen@us.af.mil>

Subject: Re: [Non-DoD Source] Where is the public notice for the hearing and D-EIS?

Can you also be precise and clear on the proposed changes for the park?

From my interpretation of the documents, it seems that

-Overnight training in the National Park is already authorized?

-This plan has potential to increase the training volume by 25%, including overnight training?

-Will the west-heading planes loop around the terminus of the MTR that runs through the park and head east or will they continue west by going through the gap area without any MTRs westward of the National Park? (My interpretation of the military airspace is that there is a gap in airspace between the MTR that runs through the National Park and the MTRs west of the National Park. However I don't understand the implications of "defense area" on the sectional charts with respect to military training--does that just mean the military aircraft fly over there area too in addition to the MTRs?"

--M.S.

Email Message 10: M.S. Comments on January 8, 2024

From: M.S. <Email Address Removed>

Sent: Monday, January 8, 2024 9:41 PM

To: CHEN, CHINLING CIV USAF AFMC AFCEC/CIEE <chinling.chen@us.af.mil>

Subject: [Non-DoD Source] Comment for T-7A Recapitalization Environmental Impact Statement

Personal information:

Name: M.S.

Email: [Email Address Removed]

Comment below:

Unique Soundscape of Big Bend area

-Mylifeoutdoors strategically scouted wilderness areas that were claimed to be quieter than the rest, and he found that Big Bend National Park was the quietest with respect to natural silence (absence of man-made noise) and absence of aviation noise

Source: https://www.youtube.com/watch?v=-KgaOs_p2do&t=887s

-Gordon Hempton has noted regarding Big Bend Ranch State Park that ““By all accounts, this may be the quietest, least noise-polluted location in the U.S,” Hempton says. Two reasons contribute: its location on the Mexico–U.S. border is an area that sees less air traffic, and its arid climate is less elastic, so when any sound (including noise pollution) occurs, it fades quicker and is less clear.”

(Source: <https://www.outsideonline.com/adventure-travel/destinations/north-america/most-quiet-parks-us/>)

Note: The same principals of lower air traffic, particularly commercial air traffic which can be verified using a live flight tracking website, **can be applied to Big Bend National Park.**

Silence

Silence, or the absence of man-made noise, is a magical and healing experience. However, it is impossible to find anymore except for very short durations of time. It is also an all-or-nothing phenomenon. The slightest man-made noise such as distant aircraft or distant heavy vehicle/equipment can ruin it. Aircraft noise is the hardest form of man-made noise to evade, because hiking in 5 miles away from the roads won't help.

Big Bend National Park allows for the most reliable long stretches of silence than almost certainly anywhere else in the US—again this is due to the very low-level of commercial aircraft passes—maybe once every 30 minutes during the day.

Noise assessment and Noise impact shortcomings

Commonly accepted noise assessments downplay and do not thoroughly assess impact of aviation noise. This for many reasons:

-A-weighted decibels discount low-frequencies, and do not account for vibration-effects. (see section below "other noise studies" for more evidence.

(People report aviation noise sounds much louder than other noises of the same dBA level or they were expecting a higher dbA reading than what was found..."sounds louder than the meter reports")

-Noise can damage more than hearing (cochlea organ of the ear). Low-frequency noise at relatively low levels has been shown to damage the vestibule organs of the ear and cause imbalance. Some example studies are below, raw decibels need to be used to assess this as they capture the entire low-frequency spectrum as well as entire acoustic energy. And even though these studies might show 1 hr in length, that is not say that lower time periods (analogies to a NIOSH REL chart where dbA levels and time have an inverse relationship) especially at the much higher raw decibel sound pressure level that comes with aviation can cause vestibule impacts—this needs to be thoroughly studied and impacts assessed.

It also should be noted that difference species have different ear anatomies and physiologies so it could be that some species are even more sensitive to these noises and vibrations, and so the effect of noise on the vestibule organs of animals in the park should also be thoroughly studied, and impact assessed.

Chronic Exposure to Low Frequency Noise at Moderate Levels Causes Impaired Balance in Mice

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3387207/>

Heat shock protein 70 is a key molecule to rescue imbalance caused by low-frequency noise

<https://pubmed.ncbi.nlm.nih.gov/31576414/>

Unreliable existing noise data—Re-doing empirical studies necessary for accuracy

GAO audited some FAA data on noise and reported staggering discrepancies

- Percentage of people annoyed by 65dBA aviation noise jumped from 12.9% in 1992 to near 70% in 2021. See Page 29 <https://www.gao.gov/assets/gao-21-103933.pdf>

They noted factors that may have contributed to the change to be :

“The **public may have become more sensitive to aircraft** noise at a given DNL level due to changes in the nature of noise exposure (such as changes in the number of flights overhead). • There may have been changes to how people work and live, including increases in in-home businesses and teleworking as well as changes over time in expectations for spending time outdoors versus indoors. • The rise of social media, the internet, and other national and global information sources may have led to an increased awareness and perception of local and national noise issues. • The results may reflect differences in the methodology and populations surveyed in the two studies.²⁸”

(source page 30 <https://www.gao.gov/assets/gao-21-103933.pdf>)

The above paragraph, quoted directly and entirely from the GAO aviation FAA noise audit, is very important and suggests that any previous empirical noise impact data may be extraordinarily inaccurate as with the FAA numbers from 1992, and should be

reassessed empirically as was done by the FAA in 2021, otherwise the data could easily be staggeringly incorrect such as 12.9% in 1992 to near 70% in 2021.

-DNL is unreliable. One flight at 114.4 DB has the same DNL as 100 flights at 94.4 DB, BUT SEVERELY DIFFERENT IMPACTS. The former will wake you up once per night, the latter will keep you up all night.

-DBA is not an accurate measure of loudness or annoyance. Studies need to be done to assess the annoyance of equal dbA noises (e.g. stream, waterfall, wind, helicopter, propeller plane, non-propeller plane) at the same dbA level to confirm this,

Impacts on sensitive populations

As the GAO study above noted, there could be an increase in noise sensitive individuals. The current model for every square inch in the US is that if the middle 90% or so can tolerate then it's OK. But the problem with this is it leaves no area for the 10% (or however many) cannot tolerate it. And, the Big Bend area having the unique qualities of lower commercial aircraft noise make it a sensory-friendly destination for living (adjacent to the park) or recreating (within the park), and increased military noise would affect this more here than anywhere else. It would be much harder to ask the FAA to create multiple no fly zone for commercial aircrafts over other wilderness or remote areas than try to maintain the relatively good natural soundscape properties of this area here.

Also Walmart daily sensory-friendly hours is also more evidence of the widespread increase in noise sensitivity.

Other noise studies (shortcomings of A-weighted decibels):

Low-frequency noise study from MIT:

<https://web.mit.edu/aeroastro/partner/reports/proj1/lfreport-2007-001.pdf>

pg. 12: "Linear regression analysis showed that the C-weighted sound exposure level LCE was the best single-metric predictor of subjective annoyance response, explaining over 90% of the variability of the data set. LCE correlated better with the subjective data than metrics specifically designed to quantify low-frequency noise impact."

pg. 17: "The study found that C-weighted levels had a closer correspondence with both annoyance ratings and vibration levels than did A-weighted levels."

Aircraft noise characteristics and metrics paper from MIT:

<http://web.mit.edu/aeroastro/partner/reports/proj24/noisethesis.pdf>

pg. 53-54: " Miller, Reindel, Senzip, and Horonjeff (1998) in their study of low-frequency take-off noise problems at Baltimore-Washington International Airport (BWI) found that the C-weighted metrics were more highly correlated to aircraft noise impact in communities than A-weighted metrics"

Low frequency noise and annoyance

Study: [https://www.noiseandhealth.org/article.asp?issn=1463-](https://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;page=59;epage=72;aulast=Levent)

[1741;year=2004;volume=6;issue=23;page=59;epage=72;aulast=Levent](https://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;page=59;epage=72;aulast=Levent)

"Low frequency noise, the frequency range from about 10Hz to 200Hz, has been recognized as a special environmental noise problem, particularly to sensitive people in their homes.

Conventional methods of assessing annoyance, typically based on A-weighted equivalent level, are inadequate

Summary of some of the points above (some parts below may be redundant from previous submissions)

-The Big Bend area is unique in having among the lowest civilian aircraft noise pollution making it a suitable refugee location for the increasing noise sensitive populations. This expansion would make it less suitable or unsuitable as a refugee location. - -The audibility and feeling-perception of the noise and vibration at a distance, beyond cited noise contours, needs to be accessed by a wide-range of individuals including noise sensitive populations since this area is arguably the last suitable place for them with regard to inescapable aircraft noise. -Aircraft noise is relatively inescapable because unlike ground-level noise sources such as loud vehicles or equipment, you cannot hike away from or drive on a backroad away from aircraft noise. -Aircraft noise, being largely very low-frequency, is audible and can be felt for many miles outside of the military training airspace boundaries, possibly 10s of miles away depending on the aircraft and the maneuvering. -Typically during daytime hours, other noise sources such as equipment or construction are legally allowed, and so the only time left to sleep would be at night, and as a result this could ruin sleep—leaving no time for continuous sleep. -The average or median public noise impacts do not represent all persons, and being this region is attractive and suitable for noise sensitive populations due to severely lower levels of aviation noise, it makes sense here more than anywhere else to assess the noise impacts on those sensitive populations.

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