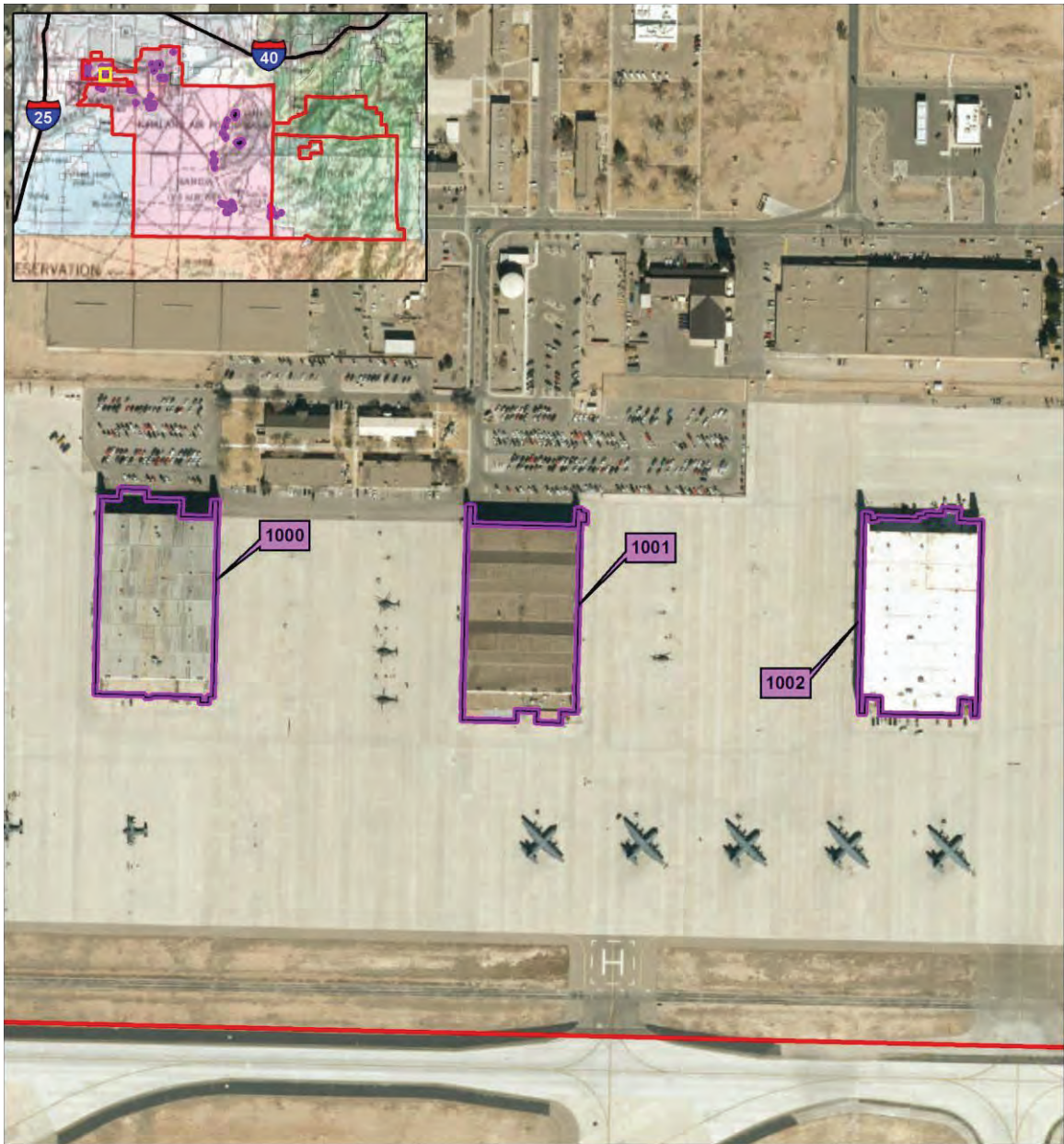


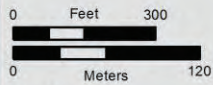
Figure 1: Plan view of KAFB no. 1002 location



Figures 2-3: photos of KAFB no. 1002



### Historic Properties



Project No. 32836.04  
 File: Bldgs\_1000\_1001\_1002  
 Map Created: 6/22/2017  
 Map Updated: 6/26/2017



- Major Roadway
- Historic Building
- Installation Area



New Mexico



## Sample Tribal Letter

### DEPARTMENT OF THE AIR FORCE 377TH AIR BASE WING (AFGSC)



14 November 2022

Colonel Jason F. Vattioni, USAF  
Commander  
377th Air Base Wing  
2000 Wyoming Blvd SE  
Kirtland Air Force Base NM 87117

Governor Vicente Randall  
Pueblo of Acoma  
PO Box 309  
Acoma NM 87034

Dear Governor Randall

In accordance with the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality regulations, and the United States Air Force (USAF) NEPA regulations, the USAF has prepared an Environmental Assessment (EA) to evaluate the potential environmental impacts resulting from the relocation of the Air Force Special Operations Command (AFSOC) AC-130J Formal Training Unit (FTU) from Hurlburt Field, Florida to Kirtland Air Force Base (AFB), New Mexico and the organizational realignment of the unit under the 58th Special Operations Wing (Air Education and Training Command [AETC]) which is a tenant organization currently located at Kirtland AFB. In accordance with Section 306108 of the National Historic Preservation Act (NHPA) 1966, as amended and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, the USAF, Kirtland AFB, is notifying you of a proposed Undertaking that has the potential to affect historic properties.

The environmental analysis for the Undertaking is being conducted by the USAF in accordance with the Council on Environmental Quality guidelines pursuant to the NEPA of 1969. Copies of the Draft EA and the proposed Finding of No Significant Impact (FONSI) are available at: <http://www.kirtland.af.mil> by clicking the "Environment" button at the bottom of the webpage. If, after review of the Draft EA and proposed FONSI you have additional information regarding the impacts of the Proposed Action on cultural resources and other environmental aspects of which we are unaware, we would appreciate receiving such information for inclusion and consideration during the NEPA process.

The purpose of the Undertaking pursuant to the National Historic Preservation Act (NHPA) is to consolidate all AC-130J FTU qualifications (initial and mission) at one active duty AETC location that already has existing MC-130J maintenance and support. In addition, the AC-130J FTU would be combined under one Major Command instead of two, saving operational and instructor resources. This consolidation would allow the command to focus on operational mission execution and streamline training pipeline as well as create an AFSOC C-130J Center of Excellence. The Undertaking is needed to provide synergies between the Basic Qualification and Mission Qualification training and lower operational costs. This Undertaking would include

relocation of AC-130J aircraft and training areas, personnel, operation squadron, maintenance squadron, and related construction activities. To accommodate the AC-130J aircraft and FTU operations, the Undertaking would require both new construction and modification of some existing facilities at Kirtland AFB. All construction would be located within the Kirtland AFB boundaries.

The AC-130J is the modern replacement for the aging fleet of C-130 aircraft. Addition of the new AC-130J aircraft would add approximately two to three more airfield sorties per training day and would primarily occur Monday through Friday. A sortie consists of a single military aircraft from a take-off through a landing. With a total of roughly 201 training days per year, this would be approximately 603 sorties per year. The AC-130J will operate within special use airspace (SUA) and other existing airspace and training areas already designated for the C-130 flight operations normally conducted out of Kirtland AFB. These include the Melrose Range Complex, with supporting SUA (Pecos and Taiban Military Operations Areas [MOAs], and Restricted Areas R-5104 and R-5105), which are also used by C-130 aircraft originating from Cannon AFB in Clovis, New Mexico. No new airspace or reconfigurations are needed or proposed to support the relocation of the AC-130J FTU from Hurlburt Field to Kirtland AFB.

The Area of Potential Effects (APE) for this Undertaking is therefore defined as the areas where ground-disturbing activities, including new construction, building renovations and modifications, building demolitions, and the lands underlying the SUA and other existing airspace and training areas. Direct impacts to historic properties within the APE and indirect effects to adjacent historic properties within the viewshed were assessed. In accordance with Section 110 of the National Historic Preservation Act (NHPA), five cultural resources inventories have been conducted within the area of potential effects (APE) on Kirtland AFB. No archaeological sites were identified.

Visual intrusions associated with the Undertaking, beneath the SUA, would be minimal and would not represent an increase sufficient to cause adverse impacts to the setting of historic properties. Due to the high altitude of the overflights, the aircraft would not be readily visible to observers on the ground and would not physically damage historic properties from vibratory effects. For the Undertaking, aircraft would be flying at an altitude above 10,000 feet mean sea level.

AC-130J flights over tribal lands would occur on the Pueblo of Isleta. Kirtland AFB implemented the *Memorandum of Understanding Between State and Federal Military Organizations and The New Mexico Indian Affairs Department for Military Low-Level Overflights of Tribal Lands* in 2016. The memorandum of understanding (MOU) established a process to coordinate use of airspace over tribal lands in order to mitigate adverse effects from the mission. Information for submitting No-Flyover requests and reporting concerns from previous overflights is available at <https://www.iad.state.nm.us/resources/low-level-fly-overs/>.

The Undertaking has the potential to impact three historic properties, hangar 1002, building 955, and building 956 on Kirtland AFB. Island B, located within hangar 1002, will be renovated to provide training and administrative capabilities (Project 4). Because the

renovations to hangar 1002 would be limited to the building's interior, the Undertaking would not impact the character-defining features of the historic property.

Project 5 consists of a temporary addition to Building 949 for Weapons Systems Trainer with a small 144 square foot (SF) permanent electrical shed added. Historic properties, buildings 955 and 956, are within the viewshed of Project 5. The setting of these buildings and associated viewsheds are not character-defining characteristics that contribute to the buildings National Register of Historic Places (NRHP) eligibility; the Undertaking would not adversely affect the NRHP-eligibility of buildings 955 and 956. Analysis and effect determinations for each component of the projects are detailed in attachment 1. Project maps are included at attachment 2 and building forms are included at attachment 3.

Kirtland AFB has reviewed the Criteria of Adverse Effect as stated in 36 CFR 800.5(a)(1) and has determined that none apply to the activities that would be carried out in this Undertaking. Pursuant to 36 CFR §800.5(b), the USAF has determined that there would be no adverse effects to historic properties by the Undertaking.

We look forward to and welcome your participation in this process. Please provide any comments you may have to ensure your concerns are adequately addressed in the Final EA. For technical information, please contact my Natural and Cultural Program Manager, Mr. David Reynolds, by email at david.reynolds.37@us.af.mil. Please contact my office at (505) 846-7377 if you would like to meet to discuss the proposed project or proceed with the Section 106 consultation.

Sincerely

VATTIONI.JASON.F. 1170028640  
Digitally signed by  
VATTIONI.JASON.F.1170028640  
Date: 2022.11.14 09:07:08 -07'00'  
JASON F. VATTIONI, Colonel, USAF  
Commander

3 Attachments:

1. Cultural Resources Analysis
2. Maps
3. Building Forms

## **Attachment 1**

### **Cultural Resources Analysis**

Kirtland Air Force Base (AFB) conducted an analysis of potential effects to historic properties as a result of the proposed Undertaking. Activities included new archaeological surveys, prefield research, review of previous archaeological and historic structure surveys, analysis, and effects determination. Following is a summary of effect determinations originating from each component of the project.

#### ***Cultural Resources Surveys/Prefield Research***

Pursuant to 36 Code of Federal Regulations (CFR) 800.4, Kirtland AFB conducted background research to identify historic properties located at Kirtland AFB and beneath the affected airspace; national historic landmarks; national battlefields; national historic trails; cultural landscapes, historic forts, or historic ranches recorded or known within the same area; and American Indian Reservations, sacred areas, or traditional use areas. The Undertaking includes approximately 315,200 square feet (SF) of new ground disturbance at Kirtland AFB.

#### **Special Use Airspace (SUA)**

Six historic properties are located beneath the Pecos North Military Operations Area (MOA) including Fort Sumner, the De Baca County Courthouse, Fort Sumner Community House/Fort Sumner Woman's Club, Fort Sumner Railroad Bridge, Fort Sumner Cemetery Wall and Entry, and the Fort Sumner State Monument (National Park Service 2022). Five of the architectural resources are also listed in the State Register of Cultural Properties (New Mexico Historic Preservation Division 2012). Additionally, two architectural resources are listed in the State Register of Cultural Properties: Rodrick Drug Store and Taiban Church (New Mexico Historic Preservation Division 2012). The Rodrick Drug Store is in the town of Fort Sumner and underlies the Pecos North MOA, and the Taiban Church is located in the town of Taiban, underlying the Taiban MOA.

#### **Kirtland AFB**

In accordance with Section 110 of the National Historic Preservation Act (NHPA), 5 cultural resources inventories have been conducted within the area of potential effects (APE) on Kirtland AFB. Results of the archaeological surveys are reported in *Report on the Results of an Archaeological Inventory of 16,000 Acres on Kirtland Air Force Base, New Mexico* (NMCRIS 72870); *Archaeological Survey of the Lower Tijeras Arroyo and Arroyo del Coyote, Kirtland Air Force Base, Bernalillo County, NM* (NMCRIS 125941); *Cultural Resources Survey and Building Evaluation for Proposed Privatization of Military Housing Kirtland Air Force Base, Bernalillo County, New Mexico* (NMCRIS 64623); *A Cultural Resources Survey of 55.5 Acres for Kirtland Air Force Base, Bernalillo County, New Mexico* (NMCRIS 149934).

A historic resources survey was conducted in 2002 and is reported in *National Register of Historic Places and Evaluation for Kirtland Air Force Base, Albuquerque, New Mexico*. Buildings 955 and 956 were reevaluated in 2017 (NMCRIS 138110).

No archaeological sites or historic districts were identified within the APE on Kirtland AFB. One historic property, Hangar 1002, is located within the APE of Project 4. Two historic properties, Buildings 955 and 956, are located adjacent to Project 5.

### *Building 955*

Building 955 was constructed in 1977 and is historically significant for support training conducted during the Cold War. The building was used as a flight simulator bay for the MH-53 and H-3 helicopters used by the 1550th Aircrew Training and Test Wing for rescue and recovery training. Rescue and recovery was necessary for international mobility, one of the elements of deterrence during Cold War operations and strategies. The building is constructed with ribbed metal siding, with large bay doors on the south elevation. There is an aluminum gutter and downspout system. In consultation with the State Historic Preservation Officer (SHPO) in 2002, Building 955 was deemed eligible for inclusion on the National Register of Historic Places (NRHP) (HPD log 65815) under criteria consideration G. The period of significance is between 1977 and 1987, for Cold War Training.

Character-defining features include massing, metal siding, bay door, and the interior high bay space. Site and landscape features were assessed and neither were determined to be character-defining features; the surrounding area does not maintain sufficient integrity to be eligible for inclusion on the NRHP as a historic district.

### *Building 956*

Building 956 was constructed in 1981 and is historically significant for support training during the Cold War. The building was used as a flight simulator bay for the C-130P Hercules aircraft used by the 1550th Aircrew Training and Test Wing, for fixed-wing rescue and recovery training. Rescue and recovery was necessary for international mobility, one of the elements of deterrence during Cold War operations and strategies. The building has a flat roof with a parapet and large stuccoed band at the parapet/roofline. Pebble dash stucco covers the main walls, and the windows are anodized aluminum. In consultation with SHPO in 2002, Building 956 was deemed eligible for inclusion on the NRHP (HPD log 65815) under criteria consideration G. The period of significance is between 1977 and 1987, for Cold War Training.

Character-defining features include the high bay section at the southeast portion of the building, stucco banding, and interior high bay space. Site and landscape features were assessed and neither were determined to be character-defining features; the surrounding area does not maintain sufficient integrity to be eligible for inclusion on the NRHP as a historic district.

### *Building (Hangar) 1002*

Hangar 1002 was constructed in 1955 for the Naval Air Special Weapons Facility [NASWF], the Naval organization dedicated to providing its forces with nuclear capability. The NASWF and its successor, the Naval Weapons Evaluation Facility, operated the hangar until after the Cold War era. The structure has a flat roof, walls made of corrugated asbestos siding, and large sliding bay doors with fixed steel framed/divided light windows. There is a central door for



aircraft tail extension, and one-story lean-tos on the north and south elevations. In consultation with the SHPO in 2002, Building 1002 was deemed eligible for inclusion on the NRHP (HPD log 65979) under criteria consideration A. The Period of Significance is between 1955 and 1993, for Cold War Functional Support.

Character-defining features include massing, sliding doors with wings, fenestration, and the large interior aircraft maintenance space. Island B, located in the interior of the hangar, is a 3-story building used for administrative and training activities. It is not a character-defining feature of the hangar as the interior has been remodeled several times to support various missions since the hangar was constructed. Site and landscape features were assessed and only the concrete flightline is included as a character-defining feature. The surrounding area does not maintain sufficient integrity to be eligible for inclusion on the NRHP as a historic district.

### *Project Descriptions and Effect Determinations*

#### **Overflights**

*Description:* To provide the training needed to ensure combat readiness, AC-130J aircrews would conduct operations in two types of areas: (1) the installation airfield, and (2) training ranges and SUA.

Current M/HC-130J aircraft based at Kirtland AFB fly about five sorties per day, five days per week (about 1,250 sorties per year). Each of these sorties has at least a takeoff and landing, and there are about 2,500 closed patterns conducted per year as well (with two airfield operations each). The new AC-130J aircraft would add approximately three more sorties per day and would primarily occur Monday through Friday. This would total approximately 750 sorties per year each having an average of six airfield operations for a total of 4,500 annual airfield operations.

AC-130J flight operations in and around Kirtland AFB would be very similar to those performed by the MC-130J and HC-130J aircraft currently based there. These include the Melrose Range Complex, with supporting SUA (Pecos and Taiban MOAs, and Restricted Areas R-5104 and R-5105), which are also used by C-130 aircraft originating from Cannon AFB in Clovis, New Mexico. No new airspace or reconfigurations are needed or proposed to support the relocation of the Air Force Special Operations Command (AFSOC) AC-130J FTU to Kirtland AFB, New Mexico. The AC-130J would operate within the SUA and other existing airspace and training areas already designated for C-130 flight operations normally conducted out of Kirtland AFB and Cannon AFB.

Environmental impacts for a projected use of 36,000 chaff bundles and 24,000 defensive flares annually were evaluated in the 2007 *AFSOC Assets Beddown at Cannon Air Force Base, New Mexico* Environmental Impact Statement (EIS), copies are available upon request.

The minimum altitude for M-206 or equivalent defensive countermeasure flare release in assessed New Mexico Training Range Initiative SUA outside Melrose Air Force Range (AFR) continues to be above 2,000 feet above ground level (AGL). When the National Fire Danger

Rating System indicates high fire conditions or above, the minimum altitude for flare release in SUA outside Melrose AFB shall be raised to above 5,000 feet AGL.

*Effect Determination:* Visual intrusions associated with the Undertaking, beneath the SUA, would be minimal and would not represent an increase sufficient to cause adverse impacts to the setting of historic properties. Due to the high altitude of the overflights, the aircraft would not be readily visible to observers on the ground and would not physically damage historic properties from vibratory effects. For the Undertaking, aircraft would be flying at an altitude above 10,000 feet mean sea level.

AC-130J flights over tribal lands would occur on the Pueblo of Isleta. Kirtland AFB implemented the *Memorandum of Understanding Between State and Federal Military Organizations and The New Mexico Indian Affairs Department for Military Low-Level Overflights of Tribal Lands* in 2016. The memorandum of understanding (MOU) established a process to coordinate use of airspace over tribal lands in order to mitigate adverse effects from the mission. A no-flyover request form is available at <https://www.iad.state.nm.us/resources/low-level-fly-overs/>.

AC-130 use of the Melrose Range Complex was previously evaluated in the *AFSOC Assets Beddown at Cannon Air Force Base, New Mexico Environmental Impact Statement*, copies available upon request. The analysis anticipated a higher number of AC-130s using this training area (airspace and range) than what has actually transpired, based on reduced numbers of aircraft at Cannon AFB. Additional use of the Melrose Range Complex by the AC-130s being proposed for basing at Kirtland AFB will result in use that is still below the levels analyzed in the aforementioned EIS. Specifically, the current C-130 use of this training area plus the proposed increase is still below the EIS levels, including total sorties, total ordnance used, and total expendable countermeasures used. All the impacts from the proposed additional sorties from Kirtland AFB-based AC-130s would still be at or below the previous levels analyzed. Kirtland AFB concludes that overflights from the AC-130J will not adversely affect historic properties within the APE.

## **Project: 1**

*Name:* Temporary New Squadron Operations Facility

*Description:* The temporary squadron operations facility is required to support the AC-130J aircraft training function until the permanent solution military construction (MILCON) project is completed in fiscal year (FY) 2028. The temporary squadron operations facility would be sited east of Building 926 in an area that is currently an open field. This project would include five temporary 5,000-SF modular trailers that would be used for administrative offices that comprise a squadron command section, aircrew flight equipment (AFE) work center, AFE storage, restrooms, kitchen area, and rooms for briefing, mission planning, and conferences. In addition, utilities, additional parking, and walkways would be added to support these trailers. The utility connections would include electricity, stormwater, potable water, natural gas, telephone, computer network, and Wi-Fi. Additional gravel parking would be needed unless the parking area at Building 926 can be used. The maximum number of parking spaces required is 119

(approximately 48,000 SF with 3 handicap spaces and 116 standard spaces and driving aisles). There would also be paved pedestrian walkways as needed between the trailers and from the parking area.

*Ground Disturbance (square feet): 75,900*

*Effect Determination:* Kirtland AFB concludes that Project 1 will not adversely affect any historic properties. No historic properties were identified within the APE and the temporary facility will be demolished once the permanent operations facility is constructed.

## **Project: 2**

*Name:* New Squadron Operations Facility and Parking

*Description:* This MILCON project is required to provide a permanent solution for AC-130J squadron operations. This project would involve the construction of administrative offices that would include a squadron command section, AFE work center, AFE storage, restrooms, kitchen area, and rooms for briefing, mission planning, and conferences. The new facility would be 20,000 SF and sited on the current Air Force Research Laboratory (AFRL) storage yard, west of Building 994. The yard space will be replaced with a new paved storage area (20,000 SF) on the north side of Randolph Avenue in an undeveloped area as part of the MILCON project to meet the needs of the AFRL. The utility connections to the new facility would include electricity, stormwater, potable water, natural gas, telephone, fire protection system, computer network, and Wi-Fi. A paved entrance/egress (4,500 SF) from the existing parking lot, east of the water tank, onto Randolph Avenue would also be constructed. An additional 46 paved parking spaces with driving aisles and landscaping (9,300 SF) would need to be constructed on the open lot on the east side of Building 995 across from the west side of the water tank (Building 1004) and Plumhoff Way.

*Ground Disturbance (square feet): 53,800*

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 2 will not adversely affect any historic properties.

## **Project: 3**

*Name:* Addition to Building 957

*Description:* The project is required to provide additional space for course instructor and other training support offices. This project would involve the construction of a 5,000 SF addition to the east side of Building 957, constructed in 1997, on an undeveloped area. The addition would include four classrooms with a 12-student capacity, office/administrative space for five personnel, and 800 SF of storage. The height of the addition would match the existing building. The utilities would be connected through Building 957 existing services and the communication infrastructure would include computer network, Wi-Fi, and the Learning Management System. No additional parking would be required.

*Ground Disturbance (square feet): 5,000*

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 3 will not adversely affect any historic properties.

#### **Project: 4**

*Name:* Renovate Hangar 1002 (Island B)

*Description:* This project is required to provide space for the beddown of the AC-130J Aircraft Maintenance Unit (AMU) and associated equipment. The project would involve complete renovation of Hangar 1002, Island B and would include administrative offices, storage area, classified storage area, consolidated tool kit area, restrooms, and a break room. In addition, there would be the removal of existing asbestos-containing material (ACM), lead paint, and polychlorinated biphenyl (PCB); replacement of the heating, ventilation, and air conditioning (HVAC) and passenger/freight elevator; upgrades to the fire protection and electrical systems; construction of a fire-protected egress from the Island to exterior of hangar; and installation of telephone connection. There would be no ground disturbance with this project.

*Ground Disturbance (square feet): 0*

*Effect Determination:* Prior to the planning for the proposed relocation of the M/HC-130J to Kirtland AFB, renovations to Island B were proposed in 2016 to support ongoing mission activities not associated with the M/HC-130J. In consultation with the SHPO, Kirtland AFB determined that the renovations would not adversely affect historic properties (HPD log 104787). The only change in scope from the 2016 consultation is the proposed replacement of the existing elevator in Island B.

Project 4 of the Undertaking calls for the renovation of Hangar 1002, an NRHP-eligible building. Because the renovations would be limited to Island B within the building's interior, the Undertaking would not impact the character-defining features of the historic property. Kirtland AFB concludes that Project 4 will not adversely affect any historic properties.

#### **Project: 5**

*Name:* Addition to Building 949

*Description:* This project is required to provide space for the Weapons Systems Trainer (WST) simulator and renovation of two adjacent rooms to accommodate the aircraft cabin trainer (ACT) and the gun trainer (GTR). The project involves installing an approximately 3,600 SF temporary structure on the east side of Building 949 where there is an existing concrete hardstand to house a full motion WST. The project shall include trenching from Building 949, constructed in 1996, to the temporary simulator location. The two existing adjacent rooms would be renovated for the ACT and GTR simulators and would require HVAC and electrical upgrades. In addition, the room housing the GTR would require sound proofing the walls. The three existing 10-foot (ft)

exterior doors would be replaced with steel roll-up doors. In addition, a 144 SF electrical equipment room (12 x 12 ft) would be constructed on the north side of Building 949 to house electrical transformer(s) and switching in support of the simulators and training devices. The total estimated area of ground disturbance would be approximately 3,800 SF.

*Ground Disturbance (square feet): 5,000*

*Effect Determination:* Project 5 consists of the installation of a temporary structure to Building 949 for WST with a small 144 SF permanent electrical shed added. The temporary structure will be removed after the permanent WST is constructed. Two NRHP-eligible resources (HPD log 65815), Buildings 955 and 956, are within the viewshed of Project 5; however, the setting of these buildings and associated viewshed are not character-defining characteristics that contribute to their eligibility and would not be impacted. Kirtland AFB concludes that Project 5 will not adversely affect any historic properties.

## **Project: 6**

*Name:* New Simulator Complex

*Description:* This project is required to provide space for the AC-130J simulator facility to house two full motion AC-130J WSTs, two ACTs, a fuselage trainer (FuT), and a GTR. The project would involve constructing a 120-ft long x 60-ft wide x 60-ft high bay (7,200 SF) with a 2.5-ton overhead crane to house the WSTs. Each ACT requires construction of a 28 x 32 ft (896 SF) room. The FuT trainer room would be 140 x 40 ft (5,600 SF) and the GTR room would be 31 x 25 ft (775 SF). The facility would include an image generation room, classrooms, mission planning rooms, administrative area, restrooms, break area, and all necessary facility features to fully support the operations of the various trainers. The new facility would be 45,000 SF and sited to the west of Building 950, which was constructed in 2008. In addition, the project would involve installing all supporting utilities and constructing a covered paved walkway to Building 950 and additional parking (185 parking spaces, driving aisles, landscaping, and motorcycle parking for a total of 58,500 SF, location to be determined). The maximum square footage of the covered walkway would be approximately 900 SF.

*Ground Disturbance (square feet): 103,700*

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 6 will not adversely affect any historic properties.

## **Project: 7**

*Name:* Addition to Pipeline Dormitory

*Description:* This project is required to provide space for the additional personnel to support the AC-130J relocation. The project would involve the construction of 80 additional rooms in the joint use pipeline dormitory proposed to be built in Zia Park, increasing the total number of rooms to 432 (separate Environmental Assessment, in process) (178,089 SF or approximately

412 SF per room). The floor plan layout would comply with the Unaccompanied Housing Design Guide, and would be single occupancy with desks, visitor space, private bathrooms, and kitchenette areas. The proposed location of the project is west of Pennsylvania Street within the Zia Park Area Development Plan boundary.

*Ground Disturbance (square feet):* 33,000

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 7 will not adversely affect any historic properties.

### **Project: 8**

*Name:* New Administration Building

*Description:* This project is required to provide an administration building to hold the additional manning to support the AC-130J mission move. The project would involve constructing a 10,000 SF facility. The utility connections would include electric, natural gas, HVAC, potable water, sanitary, fire suppression, telephone, network, and Wi-Fi. The facility would be located east of the Munitions Storage Area (MSA) parking lot and northeast of Building 737 outside of the gate to the MSA on open, undeveloped land in an unsecured area.

*Ground Disturbance (square feet):* 10,000

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 8 will not adversely affect any historic properties.

### **Project: 9**

*Name:* New Munitions Trailer Holding Pad

*Description:* This project is required to provide space to hold munition trailers within the MSA awaiting loading and loaded trailers awaiting transport to the flight line. In addition, this area would be used to park government vehicles used in transporting munitions. The number of government vehicles will increase by 10 (forklifts/trucks) in order to accommodate the AC-130J mission. This increase in vehicles is due to the increase of deliveries to the flight line as well as Technical Order requirements. The project would involve the construction of a 100 x 100 ft (10,000 SF) concrete munitions trailer holding pad south of Building 733 along the perimeter road. The project would also include exterior lighting and a lightning protection system.

*Ground Disturbance (square feet):* 10,000

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 9 will not adversely affect any historic properties.

## **Project: 10**

*Name:* New Munitions Trailer Holding Pad

*Description:* This project is required to provide earth-covered igloos at the MSA to support the movement of the AC-130J FTU to Kirtland AFB. Current munition structures are at 85 percent capacity with current Kirtland AFB mission requirements and the AC-130J mission quarterly munitions requirements will increase floor space by a 65-pallet position per quarter (approximately one and a half the size of the current igloos). The project would involve the construction of two 25 x 80 ft (2,000 SF) Hayman Earth Covered Munitions Storage Igloos. An additional 7,000 SF would be included for the aprons and access road. The two igloos would be covered with a minimum of 24 inches of soil and would each have a paved surrounding apron to facilitate maneuvering of trailers and equipment. Utility connections would include electric, lightning protection system, an alarm system, and a fire protection system. In addition, a 3,500 SF stormwater drainage system would be constructed for each igloo.

*Ground Disturbance (square feet):* 18,000

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 10 will not adversely affect any historic properties.

## **Project: 11**

*Name:* New Explosive Operations Building

*Description:* This project is required to provide an additional operating location to meet the new AC-130J FTU mission requirements without impeding the current missions' requirements at Kirtland AFB. The project would involve the construction of an Explosive Operations Building (approximately 6,000 SF) to house munitions builds/teardown and expenditure operations supporting the AC-130J mission. Utility connections would include electric, natural gas, HVAC, potable water, sanitary, fire suppression system, telephone, computer network, and an alarm system. The new building would be located west of Building 748 outside of the current fence line. In addition, a 5,400 SF paved access road, a total of 3,700 SF for paved parking areas on the west and east sides of the building, and paved aprons (2,000 SF each) on the north and south sides of the building would be constructed.

*Ground Disturbance (square feet):* 19,100

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 11 will not adversely affect any historic properties.

## **Project: 12**

*Name:* Construct Small Arms Storage Facility

*Description:* The project is required to provide additional small arms storage space at the MSA to support the movement of the AC-130J FTU to Kirtland AFB. The project would involve the construction of a 100 x 100 ft (10,000 SF) small arms storage facility (also called a Butler Building). Utility connections would include electric, an alarm system, fire suppression system, and a lightning protection system. The total estimated area of ground disturbance would be 10,000 SF.

*Ground Disturbance (square feet):* 10,000

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 12 will not adversely affect any historic properties.

## **Project: 13**

*Name:* Renovate Buildings 737 and 733

*Description:* The project is required to provide improved facilities to serve the 377th Maintenance Squadron enhanced mission requirements due to the AC-130J mission beddown, including various trailer maintenance operations and other munitions equipment with working bays plus renovate available space to accommodate additional 40 personnel inbound. The project would involve the renovation of Building 733 (Brass Storage/Catenary System constructed in 1999) and Building 737 (Trailer Maintenance/Production Facility constructed in 1999). Building 733 renovations would include repairs to the concrete paving, transformer, and lightning protection. Building 737 renovations would include upgrades to electrical, removal and replacement of the oil/water separator (approximately 4,200 SF of disturbance outside on the hardstand to the southwest of the building), installation of an electric hoist system and a compressed air station, and repairs to the concrete flooring in the bays.

*Ground Disturbance (square feet):* 10,000

*Effect Determination:* No historic properties were identified within the APE and Kirtland AFB concludes that Project 13 will not adversely affect any historic properties.

### References Cited:

National Park Service. 2022. National Register of Historic Places. Available online: <https://www.nps.gov/subjects/nationalregister/data-downloads.htm>. Accessed on May 2, 2022.

New Mexico Historic Preservation Division. 2012. State Register of Cultural Properties. March.





## JLUS Sample Letter

### DEPARTMENT OF THE AIR FORCE 377TH AIR BASE WING (AFGSC)



14 November 2022

Colonel Jason F. Vattioni, USAF  
Commander  
377th Air Base Wing  
2000 Wyoming Blvd SE  
Kirtland Air Force Base NM 87117

Mr. Craig Johnson  
Assistant Commissioner for Commercial Resources  
New Mexico State Land Office  
PO Box 1148  
Santa Fe NM 87504

Dear Mr. Johnson

As set forth in the Kirtland Air Force Base (AFB) – New Mexico State Land Office Joint Land Use Study Memorandum of Understanding, and as required by the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality regulations, and the United States Air Force (USAF) NEPA regulations, the USAF prepared an Environmental Assessment (EA) to evaluate the potential environmental impacts resulting from the relocation of the Air Force Special Operations Command (AFSOC) AC-130J Formal Training Unit (FTU) from Hurlburt Field, Florida to Kirtland Air Force Base (AFB), New Mexico and the organizational realignment of the unit under the 58th Special Operations Wing (Air Education and Training Command) which is a tenant organization located at Kirtland AFB.

The purpose of the Proposed Action is to consolidate all AC-130J qualifications. The action is needed to provide synergies between the Basic Qualification and Mission Qualification training and lower operational costs. This Proposed Action would include relocation of AC-130J aircraft, personnel, operation squadron, maintenance squadron, and related construction activities. To accommodate the AC-130J aircraft and FTU operations, the Proposed Action would require both new construction and modification of some existing facilities at Kirtland AFB. Thirteen construction or infrastructure improvement projects are proposed. All construction would be located within the Kirtland AFB boundaries.

The AC-130J will operate within special use airspace (SUA) and other existing airspace and training areas already designated for the C-130 flight operations normally conducted out of Kirtland AFB. These include the Melrose Range Complex, with supporting SUA (Pecos and Taiban Military Operations Areas [MOAs], and Restricted Areas R-5104 and R-5105 [attachment 3]), which are also used by C-130 aircraft originating from Cannon AFB in Clovis, New Mexico. No new airspace or reconfigurations are needed or proposed to support the relocation of the AFSOC AC-130J FTU from Hurlburt Field to Kirtland AFB.

AC-130 use of the Melrose Range Complex was previously evaluated in the AFSOC Assets Beddown at Cannon Air Force Base, New Mexico Environmental Impact Statement (EIS), which anticipated a higher number of AC-130s using this training area (airspace and range) than what has actually transpired, based on reduced numbers of aircraft at Cannon AFB than were anticipated. Additional use of the Melrose Range Complex by the AC-130s being proposed for basing at Kirtland AFB will result in use that is still below the levels analyzed in the aforementioned EIS. Specifically, the current C-130 use of this training area plus the proposed increase is still below the EIS levels, including total sorties, total ordnance used, and total expendable countermeasures used. All the impacts from the proposed additional sorties from Kirtland AFB-based AC-130s would still be at or below the previous levels analyzed.

In accordance with Executive Order (EO) 12372, Intergovernmental Review of Federal Programs, as amended, by EO 12416, Intergovernmental Review of Federal Programs, I am requesting your participation in the NEPA document review and comment process. A copy of the Draft EA and the proposed Finding of No Significant Impact (FONSI) are available at <http://www.kirtland.af.mil> under the "Environment" button at the bottom of the webpage. If, after review of the Draft EA and proposed FONSI, you have additional information regarding impacts of the Proposed Action on the natural environment or other environmental aspects of which we are unaware, we would appreciate receiving such information for inclusion and consideration during the NEPA process. Please respond within 30 days of receipt of this letter to ensure your concerns are adequately addressed in the EA.

Please send your written responses to Ms. Brianne Sisneros, 377 MSG/CEIEC NEPA Program Manager, 2050 Wyoming Boulevard SE, Suite 118, Kirtland AFB NM 87117, or via email to [KirtlandNEPA@us.af.mil](mailto:KirtlandNEPA@us.af.mil).

Sincerely

VATTIONI.JASO  
N.F.1170028640  
JASON F. VATTIONI, Colonel, USAF  
Commander

Digitally signed by  
VATTIONI.JASON.F.1170028640  
Date: 2022.11.14 09:04:31  
-07'00'



Michelle Lujan Grisham  
Governor

STATE OF NEW MEXICO  
**DEPARTMENT OF CULTURAL AFFAIRS**  
**HISTORIC PRESERVATION DIVISION**

BATAAN MEMORIAL BUILDING  
407 GALISTEO STREET, SUITE 236  
SANTA FE, NEW MEXICO 87501  
PHONE (505) 827-6320 – [NM.SHPO@state.nm.us](mailto:NM.SHPO@state.nm.us)

November 23, 2022

Colonel Jason F. Vattioni, USAF  
Commander  
377<sup>th</sup> Air Base Wing  
2000 Wyoming Blvd SE  
Kirtland Air Force Base NM 87117

Dear Colonel Vattioni:

Thank you for your submission dated November 14, 2022, for the relocation of Air Force Special Operations Command (AC130J) and other undertakings that have the potential to effect historic properties. Our comments follow:

Project 1: Temporary New Squadron Operations Facilities

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 2: New Squadron Operations Facility and Parking

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 3: Addition to Building 957

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 4: Renovate Hangar 1002 (Island B)

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 5: Addition to Building 949

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 6: New Simulator Complex

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 7: Addition to Pipeline Dormitory

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 8: New Administration Building

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 9: New Munitions Trailer Holding Pad

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 10: New Munitions Trailer Holding Pad

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 11: New Explosive Operations Building

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 12: Construct Small Arms Storage Facility

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Project 13: Renovate Buildings 737 and 733

New Mexico State Historic Preservation Office concurs that this project will have no adverse effect to historic properties.

Please let me know if you have any questions.

Best regards,  
Steven

Steven Moffson  
State and National Register Coordinator  
New Mexico Historic Preservation Division  
407 Galisteo Street, Suite 236  
Santa Fe, New Mexico 87501  
(505) 476-0444

Please note new email:  
[steven.moffson@dca.nm.gov](mailto:steven.moffson@dca.nm.gov)



# Mid-Region Council of Governments

Dewey V. Cave  
Executive Director

Barbara Baca  
Chair, Board of Directors

## MEMBER GOVERNMENTS

City of Albuquerque  
Albuquerque Public Schools  
AMAFCA  
City of Belen  
CNM  
Bernalillo County  
Town of Bernalillo  
Village of Bosque Farms  
Village of Corrales  
Village of Cuba  
Town of Edgewood  
Village of Encino  
Town of Estancia  
Village of Jemez Springs  
Laguna Pueblo  
Village of Los Lunas  
Los Lunas Schools  
Village of Los Ranchos  
MRGCD  
City of Moriarty  
Town of Mountainair  
Town of Peralta  
City of Rio Communities  
City of Rio Rancho  
Rio Rancho Public Schools  
Sandoval County  
Santa Ana Pueblo  
SSCAFCA  
Village of Tijeras  
Torrance County  
Valencia County  
Village of Willard

November 28, 2022

Ms. Brianne Sisneros  
377<sup>th</sup> MSG/CEIEC NEPA Program Manager  
2050 Wyoming Boulevard SE, Suite 116  
Kirtland AFB, NM 87117

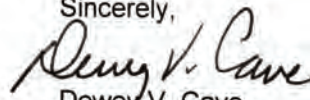
Dear Ms. Sisneros:

Many thanks for providing the Mid-Region Council of Governments (MRCOG) an opportunity to submit a comment on the Draft Environmental Assessment pertaining to relocation of the Air Force Special Operations Command AC-130J Formal Training Unit from Hurlburt Field, Florida to Kirtland AFB with organizational realignment under Air Education and Training Command and the 58<sup>th</sup> Special Operations Wing (SOW). As you are aware, MRCOG has hosted—and participated in—the Kirtland Community Sustainability Committee for the last eight years. During this time, we have worked closely with many state, municipal government, federal agency, and Air Force partners in identifying and pursuing issues which are essential to the long-term viability of Kirtland AFB. We have also developed a thorough understanding of the history and importance of the 58<sup>th</sup> SOW to the Air Force Special Operations mission.

Accordingly, we fully support the relocation of the AC-130J training unit, and we have no issues with the planned move. We are confident that any issues which emerge later can be identified and successfully addressed within the Kirtland/Community Sustainability Committee.

Again, thanks for including MRCOG in the review of the Draft Environmental Assessment. If the Kirtland NEPA staff has any questions on our comments, please let me know. My contact information: [dcave@mrcog-nm.gov](mailto:dcave@mrcog-nm.gov), (505) 724-3624.

Sincerely,

  
Dewey V. Cave  
Executive Director

DC/BB

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

From: Randy Teboe <[thpo@sanipueblo.org](mailto:thpo@sanipueblo.org)>

Sent: Tuesday, December 13, 2022 9:21 AM

To: REYNOLDS, DAVID H GS-12 USAF AFGSC 377 MSG/CEIEC

<[david.reynolds.37@us.af.mil](mailto:david.reynolds.37@us.af.mil)>

Subject: [URL Verdict: Neutral][Non-DoD Source] RE: Kirtland AFB AC-130J  
Draft Environmental Assessment

Please be advised that at this time the Pueblo de San Ildefonso as no comment regarding your project. Please proceed with your project, however if any unanticipated discovery of human remains are discovered please let us know.

Thank you,

Randy Teboe  
Tribal Historic Preservation Officer

Pueblo de San Ildefonso

Cell 505-231-6375

Office 505-455-4141

[thpo@sanipueblo.org](mailto:thpo@sanipueblo.org) <<mailto:thpo@sanipueblo.org>>



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

December 16, 2022

Brianne Sisneros  
377 MSG/CEIEC NEPA Program Manager  
2050 Wyoming Blvd. SE, Suite 118  
Kirtland AFB, NM  
87117

Submitted electronically to: [KirtkandNEPA@us.af.mil](mailto:KirtkandNEPA@us.af.mil)

RE: Draft Environmental Assessment Addressing the Air Force Special Operations Command AC-130J Formal Training Unit Relocation at Kirtland Air Force Base, New Mexico

Dear Brianne Sisneros,

On behalf of the New Mexico Environment Department (NMED), attached please find our comment on the subject Environmental Assessment and proposed Finding of No Significant Impact.

Strong intergovernmental coordination, as required by the National Environmental Policy Act (NEPA), is essential to ensure protection of human health and the environment.

NMED offers one comment regarding a potential regulatory impact of the project in the attachment for you to evaluate as the NEPA process continues.

Thank you for providing the opportunity to review the project materials. Please don't hesitate to reach out to us with any further questions or concerns you may have. In the future, please send all comment requests to [env.review@env.nm.gov](mailto:env.review@env.nm.gov). This will help expedite a timely review of your request.

Sincerely,

*Michael Chacón*

Michael Chacón  
Science Coordinator

Attachment (1)



## **Attachment**

### **Introduction**

Kirtland Air Force Base has requested review and comment on Proposed Air Force Special Operations Command AC-130J Formal Training Unit Relocation at Kirtland Air Force Base (KAFB).

### **Comments**

#### Building 737 Oil-Water Separator

The EA does not address the regulatory status of the Building 737 Oil-Water Separator referenced in the NEPA Assessment Section 2, Table 2-2, *List of Proposed Projects at Kirtland Air Force Base*, Section 3.9.2.2 *Architectural Resources*, and Attachment 1 *List of Proposed Projects at Kirtland AFB*, and Appendix B Section B.13 *Renovate Buildings 737 and 733*. The Oil-Water Separator and associated structures, ancillary features, and conveyance piping must be evaluated for releases of contaminants to the environment. Based on the information provided in the NEPA Scoping and Environmental Assessment, the Building 737 Oil-Water Separator is subject to regulation under RCRA and will be addressed through the corrective action provisions of the Kirtland Air Force Base RCRA Permit.

Vernon B. Abeita  
Governor



Lt. Governor, Virgil N. Lucero  
Lt. Governor, Blane M. Sanchez

## PUEBLO OF ISLETA OFFICE OF THE GOVERNOR

P.O. Box 1270  
Isleta, New Mexico 87022  
Telephone: 505-869-3111  
Fax: 505-869-7596

December 20, 2022

Kirtland AFB National Environmental  
Policy Act Program Manager  
377 MSG/CEIEC  
2050 Wyoming Boulevard SE, Suite 116  
Kirtland AFB, New Mexico 87117-5270  
kirtlandNEPA@us.af.mil

By Email and First Class Mail, and By Hand Delivery to Kirtland AFB Representatives

Dear NEPA Program Manager:

On behalf of the Pueblo of Isleta ("Pueblo"), I submit these comments on the Department of the Air Force's Draft Environmental Assessment Addressing the Air Force Special Operations Command AC-130J Formal Training Unit Relocation to Kirtland Air Force Base, New Mexico, dated November 2022 ("Draft EA"). I am also copying these comments to Col. Jason. F Vattioni, Commander of the 377<sup>th</sup> Air Base Wing at Kirtland Air Force Base ("Kirtland AFB"), in response to his letter of August 24, 2022, requesting government-to-government consultation on this matter. I also attach here the Pueblo's comments dated November 9, 2022 ("Nov. 9 Comments"), which I earlier submitted to you on the Final Description of the Proposed Actions and Alternatives ("FDOPAA") for the proposed Air Force Special Operations Command AC-130J Formal Training Unit ("AFSOC AC-130J FTU") Relocation.

As I described in the Nov. 9 Comments, the Pueblo is extremely concerned about the effects of the proposed AFSOC AC-130J FTU relocation. The Pueblo's review of the Draft EA has led us to conclude that the Air Force's assessment of impacts to the people, environment, and resources of the Pueblo and its Reservation has not been sufficient to meet the requirements of the National Environmental Policy Act ("NEPA") and the National Historic Preservation Act ("NHPA"). Government-to-government consultation is necessary for the Air Force to consider adequately, and hopefully resolve, these issues.

### **The Air Force Should Prepare an EIS**

The Draft EA proposes that Commander Vattioni conclude that the AFSOC AC-130J FTU relocation would "not have a significant environmental impact, either by itself or cumulatively with other known projects" and therefore an EIS is not required. Draft EA at 3.



The Draft EA further states that “the Preferred Alternative would not affect . . . Visual Resources” and that the relocation would not result in significant adverse impacts to “noise, land use, . . . , biological resources, cultural resources, . . . safety, socioeconomics, and environmental justice” and that “[n]o significant adverse cumulative impacts would result from activities associated with the Preferred Alternative when considered with past, present, or reasonably foreseeable future projects.” *Id.* at ES-2. The Pueblo strongly disagrees with those conclusions.

As I described in the Pueblo’s Nov. 9 Comments, an environmental impact statement (“EIS”) is required because, if the AFSOC AC-130J FTU relocation occurs, there will be significant effects on the Pueblo and its Reservation, including on cultural properties, sacred sites, and historic properties listed on or eligible for listing on the National Register of Historic Places (“NRHP”). The Air Force must study these effects in an EIS. The Draft EA does not provide any reason for the Air Force to avoid preparing an EIS. As I describe further below, the Draft EA does not describe or consider any impacts (including cumulative impacts) on the Pueblo or its Reservation, including impacts on visual resources, noise, land use, biological resources, cultural resources, safety, socioeconomics, and environmental justice. Consistent with NEPA and the NHPA, the Air Force must consider these effects in an EIS.

### **The Pueblo Reiterates its Comments on Sections 1 and 2 of the Draft EA**

Sections 1 and 2 of the Draft EA are reproductions of the FDOPAA. As noted above, the Pueblo already commented on the FDOPAA in the Nov. 9 Comments. I re-incorporate those comments here as reasons why Sections 1 and 2 fail to adequately consider effects on the Pueblo. Furthermore, because the Draft EA only considered comments submitted by September 22, 2022, Draft EA at ES-7, the Draft EA did not consider the Pueblo’s comments and the Air Force cannot rely on the Draft EA as a basis to resolve the issues I raised in those comments.

### **Failure to Acknowledge the Pueblo’s Existence**

The Draft EA does not include the Pueblo’s Reservation in its depiction of the general area, *see* Draft EA at 1-2, fig. 1-1, in its depiction of the Region of Influence (“ROI”) for evaluation of socioeconomic impacts, *see id.* at 3-67 fig.3.13-1, or its depiction of the ROI for evaluation of environmental justice, *see id.* at 3-71 to 3-73 & fig. 3.14-1. That is a stunning omission. The Pueblo’s Reservation, where the Isleta people currently reside and where the Pueblo exercises all the powers of tribal self-government including management of cultural, environmental, and subsistence resources, is directly adjacent to Kirtland AFB. The Pueblo self-evidently has an interest in the areas adjacent and near to its Reservation. The Pueblo resided in and governed those lands for centuries, and the connections forged over those years still exist today in our people’s cultural and religious practices. And because air, water, and other resources do not recognize political boundaries, impacts to the environment near the Pueblo’s Reservation often impact the Reservation. Yet, the Draft EA fails to describe or even acknowledge the existence of the Pueblo and its Reservation. That undermines the Draft EA’s analysis of the impacts from the proposed AFSOC AC-130J FTU relocation and renders it deficient under NEPA and the NHPA. Simply put, the Air Force has not taken the required “hard look” at the impacts of actions at Kirtland AFB if it does not acknowledge the existence of



a sovereign nation bordering Kirtland AFB. *See, e.g., Marsh v. Or. Natural Res. Council*, 490 U.S. 360, 374 (1989).

### **Noise and Visual Impacts from Overflights**

I remain extremely concerned about noise and visual impacts to the Pueblo from overflights resulting from the proposed AFSOC AC-130J FTU relocation. The Draft EA does not give those impacts any consideration. Given the severity of these impacts, and the lack of consideration to date, the Air Force must develop an EIS.

#### *Noise Impacts*

The Draft EA concludes that “impacts from noise associated with proposed operations at the airfield would not be significant.” Draft EA at ES-3, tbl.ES-1; *id.* at 2-27, tbl.2-8. That conclusion rests on the Air Force’s use of NOISEMAP to model the increase in Day-Night Average Sound Level (“DNL”) from an additional 450 AC-130J sorties a year at Kirtland AFB. The Air Force modeled those noise impacts by picking 31 “points of interest” (“POI”) near Kirtland AFB and determining the increase in “long-term exposure to noise” at those POIs and the increase in “long-term community annoyance with aircraft noise” that would result. Draft EA at 3-4 to 3-5. Using this modeling, the Draft EA concludes that DNL will only increase by one decibel in a small area, and that this increase will not impact people’s sleep, *see id.* at 2-27, tbl.2-8, 3-7, § 3.3.3.

First, I must point out that evaluating an average noise level over a twenty-four-hour period ignores the impacts that particular noise events may have in and of themselves as “outliers” to the statistical average and standard deviation from that average. Focusing on the average, rather than the events themselves, waters down the Draft EA’s analysis, especially since the events can have outsized impacts on the Pueblo far beyond “annoyance,” as described further below.

Those potentially outsized impacts are particularly troubling because the noise model did not evaluate noise impacts on *any part* of the Pueblo’s Reservation. *See id.* at 3-13 fig.3.3-1, 3-16 fig.3.3-2. None of the 31 POIs were located on the Reservation—they were all located very close to the airstrip which is used by both Kirtland AFB and the Albuquerque Sunport. *See id.* at 3-13 fig.3.3-1, 3-14 tbl.3.3-4, 3-17 tbl.3.3-6. Additionally, impacts of noise on land use on the Pueblo’s reservation lands were not evaluated at all. *See* 3-21, fig. 3.4-2. The NOISEMAP modeling and the Draft EA’s consideration of it, thus do not describe or evaluate impacts on the Pueblo. That is significant for two reasons.

First, and most obviously, the modeling says nothing about how increases in noise from more flights will impact the Reservation. The Draft EA does not evaluate impacts on the Pueblo and its Reservation because the NOISEMAP modeling did not include POIs on the Reservation. The Air Force must revise its modeling to include POIs on the Reservation. Through government-to-government consultation, we can discuss what locations are important and should be used as POIs for that modeling.



Second, the modeling only evaluates increased noise in an area subject to many civilian flights as well as military flights, and therefore likely understates the overall effect on the Pueblo and the Reservation. As the Draft EA notes, an additional 450 sorties a year from the additional AC-130Js at Kirtland AFB will only result in an increase of 3.5% in total civilian *and* military flight operations from the airfield. *Id.* at ES-3, tbl.ES-1. As a result of the limited geographic scope of the NOISEMAP modeling, and the inclusion of all airfield operations, the Draft EA concludes that DNL would only increase by 1 decibel. *Id.* at 3-48. But noise impacts on the Pueblo are likely to be much higher, because there are very few, if any, low-altitude civilian overflights of the Reservation. Adding 450 sorties of military aircraft a year from Kirtland AFB will therefore result in a much larger percentage increase in total overflights of the Reservation, and a much higher increase in high-volume overflights and DNL on the Reservation.

The Draft EA also does not consider adequate measurements for how noise may affect the Pueblo, our members, and our resources. The scope of potential effects is considerable and wide: the dramatic, unusual impacts from low military overflights impacts quality of life, economic activity (including agricultural activity that depends on the health of domesticated animals), routine governmental operations like environmental or cultural surveys, and animals and plants in the environment. Although the Draft EA notes, “response of different individuals to similar noise events is diverse and is influenced by the type of noise, perceived importance of the noise, its appropriateness in the setting, time of day, type of activity during which the noise occurs, and sensitivity of the individual,” it assumes that the principal impact of overflight noise on people would be “annoyance.” *Id.* at 3-3. The NOISEMAP modeling described in the Draft EA only mapped noise of 65 decibel DNL or higher because “[r]esearch has indicated that about 87 percent of the population is not highly annoyed by outdoor sound levels below 65 db DNL.” *Id.* at 3-5. But we are concerned about the noise from overflights because it can disrupt religious and cultural ceremonies and the environment on the Reservation, not because it will “annoy” people. The level of noise required for a cultural or religious ceremony varies, but the importance and solemnity of certain cultural activities may require silence, or noise no louder than natural background noise, which in the area around the Pueblo could be lower than 20 decibels. *See Mapping Sound*, Nat’l Park Serv. (Mar. 23, 2021), <https://www.nps.gov/subjects/sound/soundmap.htm>. Kirtland AFB has long since acknowledged that the Village routinely requires a “noise and disturbance free environment” for cultural and religious practices. *See Memorandum of Understanding Between the Pueblo of Isleta and Kirtland Airforce base (“JLUS MOU”)*. Using 65 decibels as the lower limit threshold for mapping effects on DNL is therefore simply inadequate for consideration of noise impacts on the Pueblo. The Air Force should map all sound impacts on the Reservation from overflights, using the level of *natural* background noise as the lower limit threshold to map effects.

Also, simply looking at the DNL in an area on or near Kirtland AFB is also not a sufficient review of impacts to the Pueblo and its resources. As noted, military overflights can disrupt tribal religious and cultural practices by creating especially loud noises during times that require especially quiet background noise. And, as I noted in the Nov. 9 Comments, we are concerned that military overflights are disrupting domestic and wild animal behavior. Concentrated periods of loud noise could have lasting impacts on wildlife that experience it. I am concerned that noise impacts from overflights have negative effects on animal life, especially if they occur during important parts of an animal’s lifecycle such as breeding, gestation, or birth.



The Air Force must therefore also consider when these noise events will occur during the day and year, their intensity and length, and how those specific times and lengths of noise will impact human and animal life on the Reservation. That should include at least a “hard look” at when and where people and animals will experience aircraft noise and what the Sound Exposure Levels of those noises will be, *see* Draft EA at 3-5.

### *Visual Impacts from Planes and Spotlights*

Additionally, the low military overflights we experience on the Reservation have striking visual impacts. Planes flying low to the ground change the entire viewscape and intimidate people on the ground. Unfortunately, these happen regularly on the Reservation. The Draft EA’s only consideration of the visual impacts of AFSOC AC-130J FTU relocation anywhere near the Pueblo was that “[m]inor and short-term impacts to the visual landscape could result from temporary construction activities but would not persist following project completion. Therefore, visual resources were dismissed from detailed analysis in this EA.” *Id.* at 3-1. This completely ignores the impacts that overflights on the Pueblo have had and will continue to have.

Visual impacts of overflights will impact cultural resources. The Draft EA does note this, by stating that “[a]ircraft operations are most likely to affect historic buildings, structures, and districts where setting is an important aspect of a property’s significance. Visual intrusions can include aircraft overflights which intrude into the viewshed of a cultural resource, thus adversely affecting its setting. The aircraft flying overhead has the potential to adversely affect the setting, feeling, and character of cultural resources within sight of the aircraft.” *Id.* at 3-43. As I noted in the Nov. 9 Comments, the Village on the Reservation is a historic property listed on the NRHP, and there are many cultural and sacred sites, trails, and other features on the Reservation that are or could be NRHP-eligible that may be exposed to low-altitude overflights.

The Draft EA also entirely ignores an extremely disruptive visual impact from military overflights: Military airplanes shining spotlights into homes in residential areas of the Pueblo. This is not simply a cultural resource protection issue. People cannot work, relax, sleep, spend time with their families, or engage in cultural or religious practices when military aircraft fly overhead and shine lights into their homes. The Draft EA makes no mention of the increase in these impacts that would result from the proposed AFSOC AC-130J FTU relocation.

Rather than evaluating the impacts of overflights on the Reservation, the Draft EA only refers to the 2016 Memorandum of Agreement Between the State and Federal Military Flying Organizations and the New Mexico Indian Affairs Department (“OTAM MOU”), stating that it “includes an airspace request communication flow chart to ensure that cultural and ceremonial events will not be affected by low-level overflights.” Draft EA at 3-43. The Draft EA only discusses the use of the OTAM MOU at the Special Use Areas in unpopulated areas of the State, does not consider how the OTAM MOU might be used to mitigate or resolve problems caused by visual and other impacts of overflights on the Reservation or at the Village, and does not consider how the JLUS MOU might be brought to bear or improved *at all*. And as I described in the Nov. 9 Comments, although the Pueblo appreciates the OTAM MOU and the JLUS MOU, they have not solved the overflights problem on our Reservation. So simply pointing to their existence is not the requisite “hard look” that NEPA requires the Air Force take at the impacts of



the proposed AFSOC AC-130J FTU relocation. Given the natural, historical, and cultural resources on the Reservation, the Air Force should at least consider how it could mitigate impacts to the Reservation by implementing military overflight policies for the Reservation that it would seek to apply to National Park Service units, National Wildlife Refuges, or National Conservation Lands.

### **Impacts on Plants and Animals Must be Considered**

The EA also only considers impacts on plant and animal species and their habitats on Kirtland AFB and the Special Use Area (“SUA”), which is very far from the Reservation. *See* Draft EA at 3-35 to 3-41. There is no consideration of species or habitat on the Pueblo’s reservation. Because noise and overflight impacts on the Reservation were not evaluated, there is no basis on which to exclude consideration of plant and animal species and habitat on the Reservation from the environmental assessment.

### **Impacts to Cultural Resources on the Reservation Must be Considered**

The Draft EA notes that its analysis of “potential impacts on cultural resources is based on the following considerations: (1) physically altering, damaging, or destroying all or part of a resource; (2) altering characteristics of the surrounding environment that contribute to resource significance; (3) *introducing visual, audible, or atmospheric elements that are out of character with the property or alter its setting*; or (4) neglecting the resource to the extent that it deteriorates or is destroyed.” Draft EA at 3-46 (emphasis added). But, as I have already noted here and in the Nov. 9 Comments, the Draft EA does not adequately consider visual, audible, or atmospheric impacts on the Reservation. The Reservation is not included in the area of potential effects, so impacts on cultural resources have not been adequately evaluated in compliance with the NHPA. *See id.* at 3-43 (describing APE as including “areas where ground-disturbing activities, including new construction, facility modifications, and demolitions would occur, and includes the lands underlying the SUA and other existing airspace and training areas”). Indeed, the Draft EA only discusses impacts to archaeological resources at Kirtland AFB and SUAs, not on any cultural resources on the Reservation. *Id.* at 3-45. The visual, audible, or atmospheric elements of overflights are certainly out of character with the cultural resources on our Reservation and will alter their settings, and the Air Force must evaluate them in its environmental review.

Such resources on the Reservation include what the Draft EA identifies as “traditional cultural properties.” The Draft EA concludes that “traditional cultural properties” do not exist at Kirtland AFB or the SUA—without considering the Reservation—on the basis that none have been “identified” there and “no responses have been received from federally recognized Tribal Nations and Pueblos associated” with those areas.” *Id.* at 3-49. As I pointed out in the Nov. 9 comments, which the Air Force did receive, the area of potential effects for the proposed AFSOC AC-130J FTU relocation must include the Reservation. The Air Force must identify and consider impacts to cultural resources on the Reservation—including traditional cultural properties.

