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BRAC Commission

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To: BRAC COMMISSION Fax: 703-699-2735

From: Anne Gomez Date: 8/10/05

Re: Davis-Monthan Air Force Base, Tucson, Arizona Pages: 1 of 9

A Rebuttal to the D-M 50 White Paper

Urgent For Review Please Comment Please Reply

Notes: A rebuttal to the White Paper presented by D-M 50 to follow. Please distribute and kindly place in your library.

Davis-Monthan and Tucson: Why Bringing in Expanded Flight Operations May Jeopardize the Future of Davis-Monthan Air Force Base

This paper is written as a rebuttal to the White Paper commissioned by the DM-50 (a business league) entitled "Davis-Monthan and Tucson: A Community Alliance Transforming Together in the 21st Century." This rebuttal paper will demonstrate that the DM-50 White Paper fails to show that there is a clear potential for expanded flight operations at Davis-Monthan Air Force Base (DM) in the areas of community support, environmental sustainability, and urban encroachment.

The DM-50 White Paper urges the DOD to consider bringing a Center of Excellence for Close Air Support to Davis-Monthan, including the expanded flight operations that go with such a Center. The White Paper enthusiastically calls for basing F-22s and F-35s at Davis-Monthan, yet it fails to mention that Davis-Monthan is one of the few Air Force bases in the country surrounded on all four sides by high density urban development (planned development in the rapidly closing southeast corridor includes approximately 600,000 new residents, a 225,000 square foot Wal-Mart and 85 acres of high density commercial development on the edge of DM's 0-30,000' approach-departure corridor, and other "technical" exceptions to current safety and noise restrictions.) Furthermore, the White Paper neglects to mention that F-22s are several orders of magnitude louder than the A-10's currently based in Tucson and that F-35s are reputed to be even louder, that no publicly available environmental impact studies have been conducted regarding the effects of increased DM noise and flight operations on the surrounding community, and that no elected official or governmental body has made any effort to educate the Tucson community about how the recommendations put forth in the White Paper will affect their lives. Most importantly, the White Paper fails to mention that the affected area extends far beyond the Accident Potential Zone to encompass the entire central Tucson valley—the area that lies within the 136 square mile DM Vicinity Box, or Military Zone. Hundreds of thousands of residents and thousands of businesses will be adversely affected if the White Paper recommendations are followed, and yet these voices have not been heard. We intend to change that.

We are Tucsonans for Sound Solutions¹, a neighborhood interest group dedicated to the preservation of Davis-Monthan and the long-term viability of the host community that supports it—their fates are inextricably interwoven. We are retired doctors, and retired military. We are lawyers, engineers, business owners, advertising and media professionals. We are housewives, wage earners, and school teachers. We are united together under one common cause: to protect the future of Tucson and Davis-Monthan.

We have been receiving reports from residents and concerned business owners all over Tucson of negative impacts associated with increased flight operations related to

¹ Tucsonans for Sound Solutions is an all-volunteer, ad hoc group of concerned citizens working to educate Tucson residents and decision makers on issues affecting Davis-Monthan Air Force Base and its host community.

Operation Snowbird (the year-round "guest" training program that brings in flight operations from the greater United States and also brings in foreign nationals for training over metropolitan Tucson). Squadrons of F-16's (and other aircraft for which no environmental impact study has been commissioned) now routinely can be seen training over densely populated areas throughout Tucson performing low altitude as well as "touch and go" training flights. In addition, night flights are now routinely conducted throughout the central city at all hours without apparent regard to the residents below. As one elderly resident told us "Yes I'm very concerned. It looks to me like they're sacrificing the central city just to get the economic benefits of the base." This opinion is widespread among residents with whom we have spoken. Although City of Tucson officials have neglected to conduct any public opinion surveys, our informal telephone surveys indicate that a majority of neighborhood association leaders throughout central Tucson are deeply concerned about recent spikes in jet noise and similar flight operations out of Davis-Monthan. Our goal is to make sure that this growing public concern does not erupt into opposition to Davis-Monthan's continuing presence in Tucson. Sadly, the interests that commissioned the White Paper have failed to take this growing public concern into account.

The Joint Land Use Study (JLUS) and the City of Tucson Ordinances adopting the JLUS excluded all of the affected neighborhood stakeholders

The White Paper asserts that "encroachment issues highlighted in previous BRAC rounds have been effectively mitigated and the community continues to move forward with some of the most aggressive zoning restrictions in the country." The Joint Land Use Study (JLUS) began in early 2002. The JLUS was funded by the U.S. Department of Defense and the Arizona Department of Commerce and coordinated locally in Tucson. Over a two-year period, from 2002 to 2004, during which no meaningful notice to the public was provided, a panel of decision makers made substantive decisions in relative secrecy. Only one of the hundreds of affected neighborhood and homeowner associations was allowed to observe, and representatives from that neighborhood have stated publicly that they were not allowed to be part of the decision making process. The JLUS decision makers used a hypothetical and apparently arbitrary expanded DM mission of five squadrons of F-16's to justify enlarging the safety and noise perimeter map, hereinafter referred to as the AEZ. Thousands of currently existing homes and businesses on all sides of Davis-Monthan were suddenly included within the new expanded AEZ perimeter. Worse, over 6,000 currently existing residential properties are now in a zone considered "incompatible with residential use" both in terms of noise and safety.

From 2002 through 2004 none of the affected residents were apprised through any concerted public educational outreach of the potential impact of the JLUS on them or their property, and were certainly never informed of the re-drawing of the AEZ perimeter lines. Only on August 16, 2004, more than two years after the JLUS process began and only after the new lines for the proposed AEZ perimeter had already been drawn, did approximately 8,000 affected residents and business owners finally receive Legal Notice and protest/appeal forms in the mail. The Notice did not explicitly mention expansion of

the high noise zone or AEZ perimeter. Only 200 "interested parties" actually received a copy of the AEZ itself.

This August 16, 2004 mailing aroused a firestorm of public concern so significant that the Tucson Planning Commission postponed its September 1, 2004 vote on the subject to its October 6, 2004 meeting. At the October 6, 2004 meeting, in response to ongoing public concern, the City of Tucson's Planning Commission voted unanimously to recommend that the Tucson Mayor and Council delay adopting the JLUS' expanded AEZ perimeter. They recommended delaying the making of this decision in order to allow time for the thousands of affected residents to fully participate in this process. In spite of this recommendation, Tucson's Mayor Bob Walkup, himself a member of the DM-50, and the City Council (with the exception of 1 dissenting vote), chose to ignore the recommendations of the Planning Commission. Less than two weeks later, on October 25, 2004, in a 6 to 1 vote, the Mayor and Council adopted the JLUS expanded AEZ perimeter into City Ordinance. They did this in spite of the fact that the Council chambers were filled to capacity with hundreds of outspoken citizens opposing such hasty action. If these are the "aggressive zoning restrictions" that the White Paper boasts of, we suggest that this kind of unilateral action is counter-productive. Eight thousand disenfranchised residents and business owners cannot all be bought out with the limited funds provided under the State of Arizona's Military Installation Fund (MIF)

Although public records requests are still pending, troubling questions remain unanswered: Why were none of the affected neighborhood or homeowner associations included in the JLUS decision making process while several prominent developers, DM-50 members, and institutional entities were represented at the table? Why were no large-scale public notices provided for the two-year period from 2002-2004 during which all substantive JLUS decisions were being made and maps being drawn? After February 2004 when the final version of the JLUS recommendations was completed, why were few, if any, of the public notices concerning these recommendations distributed in Spanish when a large percentage of the affected population is predominantly Spanish speaking? After 2004, why were the routine public notices concerning approval of such an important document as the JLUS recommendations sent only to 200 "interested parties"? Why is it that several residents have reported to us that when they sought more information from the City of Tucson they were told that the JLUS process would have no effect on them or their property?

Through selective enforcement of the JLUS and AEZ requirements, the City of Tucson is failing to effectively control encroachment in the Southeast corridor

The White Paper asserts that "for the last 10 years, the community has moved aggressively and with great success to combat encroachment" including "aggressive zoning ordinances [that] now effectively control encroachment." Unfortunately, this may only be true on paper--not on the ground. The Tucson City Council has granted zoning permits for aggressive encroachment in the only remaining undeveloped land abutting Davis-Monthan Air Force Base—the southeast corridor. According to a Town Hall presentation hosted by Councilmember Fred Ronstadt in March of 2005, the City is

planning for 600,000 new residents to the southeast of Davis-Monthan, effectively placing the Base dead center in a heavily populated metropolitan area. Worse, a recent map indicates that within the Southeast Airport Environs Zone itself, at least 140,000 additional dwelling units are currently being planned.

Tucsonans for Sound Solutions and other citizens concerned about the long-term survival of Davis-Monthan Air Force Base continue to sound the alarm concerning the accelerating growth to the southeast—DM's rapidly shrinking live ordinance approach/departure corridor. Certainly on paper and in reports to the DOD, the problem seems to have been addressed. But the City of Tucson's selective enforcement of the "aggressive zoning ordinances" in the JLUS and AEZ raises troubling questions. Why does the JLUS noise paddle dimple so as to allow higher density development along certain property lines and not others, and at what point in the JLUS process did those dimples appear? Why are a local church, gymnasium, Domino's Pizza, and women's health clinic being asked to leave for safety reasons (on the grounds that any enterprise likely to attract large gatherings of people risks DMAFB's mission), while less than 900 yards away a 225,000 square-foot, 500-600 employee Walmart is being proposed as the first in a series of high-density commercial developments slated for an 85-acre parcel inside the 30,000-50,000' departure corridor? This 85-acre parcel is only a few city blocks away from the 0-30,000' departure corridor--an area designated for no more than 20 employees per acre. How is this planned development compatible with the White Paper's proposal for expanded flight operations at Davis-Monthan? City of Tucson consultant Eugene Santarelli said in a November 2003 strategy memo to City officials that while allowing non-residential uses in the 30,000-50,000' paddle "is on the mark," he warned of the dangers of "'creative math' which may unknowingly permit non-compatible uses in an area where 100% of the DM live ordinance departures occur."

Of note is the fact that the month before (October 2003), in a billing statement to the City of Tucson, Santarelli states that he met with representatives of the developer planning this 85-acre commercial development and shared the USAF's population density concerns. However, according to Santarelli, the developer's personnel "presented convincing rationale that lot coverage size would effectively control population density just on the economics of building." In other words—bringing in a Walmart, a large-scale commercial shopping center with massive inflows of street traffic and additional planned big-box stores, attracting large numbers of shoppers into an area inside the 30,000-50,000' live ordinance departure corridor and 900 yards away from the boundary to the 0-30,000' departure corridor, presents no problems. Does the developer's "convincing rationale... *on the economics of building*" address all of the DOD's logistical concerns? Is it wise to allow the viability of future flight operations at Davis-Monthan to rest so casually on technicalities?

Furthermore, why is it that within the 0-30,000' departure corridor the University of Arizona Science and Technology Park is allowed high density development while smaller, less influential businesses, a church and a clinic are being asked to leave? Resting on State lands and straddling comfortably the boundary between the 0-30,000' and 30,000-50,000' approach/departure corridor, the 1,345 acre campus of the University

of Arizona's Science and Technology Park (Technology Park) currently houses, among other enterprises, a 1,300-employee Citicard tenant and a newly-constructed 3 to 5 story multi-tenant office building. At build-out the Technology Park will house 25,000 employees. Because the Technology Park rests on State lands it is not subject to the same restrictions as other property owners in the 0-30,000' live ordinance approach/departure corridor. Does the integrity of future DM missions hang upon these and similar legalities? How long will it be before future DM flight operations are adversely affected by the encroaching reality of the situation on the ground?

Ongoing actions by Tucson Mayor & Council indicate continuing failure to accurately assess public opinion regarding expanded DM flight operations

The White Paper asserts that the "citizens of Tucson and Pima County are committed to a spirit of partnership with the military" and offers as evidence the "fact" that in the spring of 2004 "Tucson residents overwhelmingly approved a \$10 million bond issue as an initial move to buy land in the Davis-Monthan departure corridor to protect the base's operational capability." The White Paper neglects to mention that the \$10 million DM bond initiative did not stand alone: it was attached to an \$80 million open space preservation bond package. City of Tucson consultant Eugene Santarelli, in a billing invoice for the month of March 2004 advises his client: "Met with the Deputy [Pima] County Administrator about the proposed \$10 Million Bond issue to protect open space and land around D-M AFB. We discussed the strategy of separating the two issues or continuing to combine them. *Polls at this point indicate that keeping the D-M land issue included in the environmental issue of open space benefits D-M*" (emphasis added). Implicit in this statement is the fact that central Tucson, the area most dramatically affected by the White Paper's expansion proposals, is overwhelmingly Democratic and by implication more likely to support a bond package tied to open space preservation than to military base preservation. Furthermore, any vote to protect the Base's current operational capability in no way can be construed to be a vote for louder single-engine jets such as the F-22 or F-35. In fact, the White Paper offers no evidence whatsoever to support its assertion that Tucson residents will support an increase in flight training, night flights, or louder jets over their homes.

No meaningful public input has been sought to assess the level of public support (or lack thereof) for more and louder flight operations at Davis-Monthan. No environmental impact studies have been conducted. To our knowledge only one *economic* impact study has been conducted on this subject. Its objective was to fix a dollar amount to the revenues flowing from Davis-Monthan into the Tucson economy. No official economic impact studies have been commissioned on the projected impacts of increased jet noise and overflights on Tucson's tourism, hospitality, and restaurant industries. To our knowledge no studies have been done on the impact that expanded DM flight operations would have on the educational and research mission of the University of Arizona, and whether the faculty, staff and student population of 50,000 would be willing to accept the impact. The University of Arizona is the largest employer in Pima County and the fourth largest employer in Arizona; it is located directly beneath the northern approach flight path of Davis-Monthan.

Rather than presenting a 360 degree view of all relevant factors, only arguments driven by short-term economic gain are presented in the DM-50 paper. For example, the paper enthusiastically claims that Tucson has "one of the best-managed water supplies in the world, capable of meeting all growth projections in the foreseeable future." In contrast, recent local newspaper articles not cited in the DM-50 Paper question Tucson's ability to sustain unlimited growth. Citing to the City of Tucson Water Department's projections they report that, given Tucson's current rate of growth and the fact that conservation efforts are already at maximum capacity, and given the growing uncertainty of Colorado River Project allotments, Tucson's water supply will not meet projected needs without resorting to the limited and expensive process of using recycled effluent for drinking water. How can the DOD make important strategic decisions affecting our nation's overall security, including how to invest millions of dollars in expanded flight operations, without access to this important information?

Tucson Mayor & Council do not appear to be acting in good faith in the Mediation process

In early 2005, in response to continuing public outcry, the Arizona Governor's Office and the DM50 requested that the Udall Center for Conflict Resolution intervene to establish a mediation process (the Military Community Compatibility Committee aka the MC3) whereby residents could begin to be included in the public policy debate concerning ongoing conflicts over DM's current and future missions. However, City of Tucson officials considerably slowed the process. They delayed by several months the press release announcing the mediation. During this time period City officials never informed neighborhood representatives of their aggressive pursuit of more and louder jets at Davis-Monthan Air Force Base: taxpayer dollars were paid to the DM-50 and others to write the White Paper and taxpayer dollars paid for lobbying trips to Washington, D.C. so that the White Paper might be personally presented to Department of Defense (DOD) and Base Realignment and Closure Commission (BRAC) officials. Members of Tucsonans for Sound Solutions only recently learned of these facts in response to public records requests.

Of particular interest is a May 21, 2005 strategy memo written by consultant Santarelli for the benefit of Tucson Mayor Bob Walkup regarding the MC3 process. Publicly, the neighborhood associations have always been led to believe that the point of the mediation is to get at solutions, which implies the willingness to consider the possibility of change—*i.e.* bargaining in good faith. In contrast, Santarelli's strategy memo refers to the mediation as a "discussion" and states that the "discussion" process might prove useful as a way to "educate" the Tucson community and to provide an "unbiased" understanding of the situation so that residents do not "fixate on one source" of "aviation noise" (*i.e.* Davis-Monthan's flight operations). After all, consultant Santaralli concludes, "what must be emphasized" is that placing an idea on the table for discussion "does not mean that change will occur." From these facts it would appear that City of Tucson officials are not acting in good faith in these ongoing "discussions" with Tucson residents. It is important to keep in mind that by the time the MC3 process

resumes in September, neighborhood representatives from all over the City of Tucson will be involved in the process in spite of the fact that City of Tucson officials continue to avoid paying for public notice to these neighborhood representatives, and to avoid providing a place for them to meet. This lack of transparency undermines any assertions made by City of Tucson officials regarding public opinion. How can the DOD invest millions of dollars in expanded flight operations based simply on the assurances of what, to all appearances, is a handful of local bureaucrats and politicians struggling to keep the lid on public opinion?

Our Goal: Protect Davis-Monthan Air Force Base by considering an expanded mission which is more compatible with its long-term survival

We agree with the White Paper when it states that the Air Force "has been a stable long-term tenant" in Tucson and it is our goal to assure that this relationship continues. However, a core principle in DM's long-term success has been, until recently, its good neighbor policy with the surrounding community. This good neighbor policy encouraged good faith communications between Davis-Monthan and surrounding residents. Night flights, the number and frequency of overflights, and the riskiest training missions over the populated areas of Tucson were limited such that residents never felt that DM was incompatible. After the 1978 crash that killed two University of Arizona students, the DOD realigned DM's mission to make it more, not less, compatible with the surrounding community, including elimination of the single-engine type aircraft involved in the crash.

Now, 25 years later, to pretend that Tucson has not doubled in size, to pretend that a return to louder, more unstable (single-engine) jets and increased overflights over densely populated areas is a viable alternative, would be short-sighted indeed. We are proud of Tucson's aviation history, and wish to preserve its integrity over the long-term. Thus, one simple fact must be admitted: Davis-Monthan is no longer an Air Force base on the fringes of a major metropolitan area—it is now an Air Force base in the center of a major metropolitan area.

We, the residents of Tucson most affected by DM flight operations, offer the following alternative to the DM-50 White Paper. This alternative is offered in the belief that it represents the only way to assure Davis-Monthan's continuing successful partnership with the surrounding community well into the 21st century and beyond:

- F-16s, F-22s and F-35s and other aircraft similar in noise level and instability should not be considered for Davis-Monthan
- Keep the A-10s and the pre-October 2004 mission
- Restrict ongoing Snowbird operations to include the following:
 - A publicly available Environmental Impact Study (EIS) for every mission and every aircraft rotating through Davis-Monthan, whether bedded down or not:
 - Acceptance of any new aircraft at DM would be contingent on public approval of related environmental impact parameters including but not limited to standards concerning flight paths,

- type of aircraft, flight altitudes, training maneuvers, live ordinance, flight frequencies and times.
- o No training flights (night flights, touch & go's, low altitude training flights) over populated areas of Tucson.
 - o High risk training activities such as touch & go's, emergency procedures, etc., should occur only at alternative airfields.

It is essential for the DOD and BRAC to consider that any planning for future missions at Davis-Monthan must fully take into account the ongoing support of the host community. Failure to take this into account risks the long-term viability of the mission itself. The DM-50 White Paper fails to demonstrate Tucson's clear potential for expanded flight operations. It fails to demonstrate the existence of community support for expanded flight operations at DM (including Operation Snowbird). Furthermore, the White Paper fails to demonstrate that Tucson's long-term water supply is assured, and it fails to demonstrate that encroachment in the pivotal southeast corridor has been effectively contained.

Perhaps future expansion at DM, rather than consisting of more and louder jets, should more realistically involve augmentation of special operations, intelligence, homeland security, or related support operations. For example, groups such as the Air Force Research Laboratory in Mesa, Arizona, recently slated for closure, would be a compatible fit for Davis-Monthan for several reasons. The nature of such a group's mission is more compatible with Tucson's large urban environment than expanded flight operations would be. Furthermore, Tucson's rich intellectual resources support DM's already-existing ongoing intelligence operations. The University of Arizona is a nationally recognized research center for science, medicine, and technology, and houses the world class Center for Middle Eastern Studies. Additional expansion potential lies in the areas of auditing, recruiting, human systems/effectiveness/physiology, health and medical research and related research functions. We urge the DOD and BRAC to consider these alternative areas of activity for future missions at Davis-Monthan Air Force Base.