



**U.S. Department of Interior
Bureau of Land Management
Royal Gorge Field Office, Colorado**



**High Altitude Mountain Environment
Training
SCOPING REPORT
March 2015**

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Summary

Scoping is a public process designed to determine the range of issues and alternatives to be addressed in a National Environmental Policy Act (NEPA) document. Scoping helps ensure that real problems are identified early, that they are properly studied, that issues of no concern do not consume time and effort, and that the proposed action and alternatives are balanced, thorough and able to be implemented.

Public involvement is a vital component of the NEPA process for vesting the public in the decision-making process and allowing for full environmental disclosure. Guidance for implementing the public involvement is codified in 40 Code of Federal Regulations (CFR) 1506.6, thereby ensuring that federal agencies make a diligent effort to involve the public in preparing NEPA documents.

The Bureau of Land Management believes that public participation is vital when making difficult decisions about complex natural resource issues. Public participation is essential for land managers to make informed decisions about public lands that belong to all Americans. We look for substantive comments when analyzing projects and proposals. The best comments present new information relevant to the analysis, or present reasonable alternatives (including mitigation) other than those presented. These comments may lead to changes or revisions in the analysis or the alternatives.

Chapter 1

Introduction

The BLM Royal Gorge Field Office received an application and a Plan of Development (POD) from the US Army Fort Carson requesting the use of public lands to conduct High Altitude Mountain Environment Training (HAMET). The purpose of NEPA is to encourage public participation and actively inform the public, organizations, government agencies, Indian tribes and elected officials about the proposed action and to receive public input during the environmental review.

In accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code [USC] 4321), the United States (US) Department of Interior, Bureau of Land Management (BLM) is preparing an environmental assessment (EA) to evaluate the human and environmental effects of a proposal received from Fort Carson to conduct HAMET for a longer term.

The Army's application and subsequent POD request the use of 43 landing zones (app. 234 acres) for a term of 10 years. As required under NEPA, the BLM conducted public outreach (scoping) activities for the EA. Scoping activities began with public outreach through a web site, in person meetings, radio, television and print media and public scoping meetings in November and December 2014. Local, state and federal governments were also engaged as part of the scoping outreach. This report summarizes the scoping activities conducted, and the results of those outreach efforts.

Purpose of the EA

The purpose of the EA is to evaluate the potential impacts of the human and natural environment from possible HAMET activities if a Right of Way (ROW) is granted. Analysis will specifically address the main issues and concerns brought forward in public and internal scoping.

Overview of the Scoping Process and Scoping Report

Public involvement is being conducted throughout the course of the EA process and the public will have opportunity to comment specifically on the multiple phases of the project. This Scoping Report covers the first stage of public involvement, herein referred to as scoping.

Scoping is a public participation process designed to help the BLM with the responsibility for carrying out or approving a project, referred to as the "lead agency," to determine the scope of issues and alternative actions to be addressed in the EA. Public scoping began with solicitation of public input through a press release dated September 29, 2014. A project Web site was launched prior to the beginning of the scoping period at <http://blm.gov/23ld>. Public scoping meetings were well attended and provided an opportunity for members of the public, local government, and other interest groups to learn

about the Army's proposal and the NEPA process to review it. The public voiced their concerns and identified issues related to potential environmental impacts, which will be addressed in the EA.

This report documents the results of the public scoping phase of this proposal evaluation and will be used by the BLM to identify the key issues, data, and other information provided by the public in developing the EA.

Scoping Activities Conducted

Efforts were undertaken to inform and involve a large audience during the scoping period. Scoping activities conducted included the following:

- Launching of a project website;
- Media day;
- Two press releases;
- Built a contact list of interested publics;
- Two scoping meetings; and
- Scoping report

Scoping efforts were designed to communicate project details and solicit input from the public and various stakeholders in the EA and to build a project contact list. Details for each component are included below. Scoping efforts were not as successful as hoped, and the public played a major role in communicating project information with potentially interested parties.

Public Scoping Activities

Media Day: The BLM invited local radio, TV and print media from Colorado Springs, Canon City, Leadville, Guffey, Pueblo, Salida, Denver and Wetmore to a media day to advertise the HAMET application and POD ([see Media Advisory](#)). County commissioners from Fremont, Teller and Park Counties and Congressional Representatives were also invited. Unfortunately the media day was not well attended with only one media participant and one county commissioner in attendance.

Press Releases: There were two press releases for Public Scoping. The distribution list for the press releases includes 78 media and congressional

contacts. Press releases were sent out on September 29, 2014 and November 19, 2014.

Radio: A radio interview was conducted to garner interest in the scoping process. (October 7, 2014 – KRLN 1400 AM Cañon City, Morning Line 8:30-9:00 AM)

Scoping Meetings

Two public scoping meetings were held to discuss the Army's application and Plan of Development for HAMET and the BLM NEPA process. The first was held on October 7, 2014 at the Abbey Event Complex in Cañon City, CO and the 2nd was held on December 4, 2014 at Cripple Creek Heritage Center in Cripple Creek, CO. At each scoping meeting, power point presentations were given by the BLM and the Army outlining key project information.

Attendees were encouraged to submit written comments so their concerns could be accurately conveyed and formally addressed in the EA. Comment forms were available at the meetings for attendees to fill out and submit at the meeting or mail in later.

Cañon City Public Meeting: The first public meeting was held in Cañon City on Oct. 7, 2014 at the Abbey Event Center. The BLM staff described the Right of Way process and National Environmental Policy Act environmental review. Army staff from Fort Carson explained the POD submitted to the BLM for HAMET activities. The majority of the attendee's did ask a question or offer a statement. Based on public input and requests, the BLM and Fort Carson made the decision to host a second public meeting.

Cripple Creek Public Meeting: The second public meeting was held at the Cripple Creek Heritage and Information Center, Cripple Creek, CO on December 4, 2014. The public presented comments and questions to the BLM and Army.

All materials used at both of the scoping meeting are available online at the following web site:

<http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>.

Project Web Site

The project Web site was established on Jan. 30, 2014. The Web site can be found at <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>. The project website contains the following information and will be updated throughout the environmental review:

- What's New – identifies the latest information;
- Project News Release detailing the time and location of scoping meetings;
- Links to multiple PowerPoint presentations that give background and relevance to the project;
- A goggle earth map showing proposed landing zones and BLM land ownership;
- Contact information for the BLM.

Media Outreach

Two press releases were published on the [BLM website](#) and distributed to local news agencies. The first on September 29, 2014 described the launch of the project, the project Web site, and the date, time, and location of the local scoping meetings. A second press release was published on November 19, 2014 soliciting public comments and announcing a second public meeting. Copies of the press releases are included in [Appendix A, Press Releases](#).

Stakeholder Involvement

The BLM is closely coordinating with local agencies that may be impacted by the Army's proposal, including Colorado Parks and Wildlife, the U.S. Forest Service, Teller, Park and Fremont Counties, and other interested agencies. Colorado Parks and Wildlife has requested cooperator status on the EA. No Native American tribes have requested cooperator status. Input from interested organizations that has been received during the scoping process and will be incorporated in the EA.

Public Scoping Results

All written scoping comments received during the scoping period were read by BLM staff comments have been divided into 20 subject categories found in the [Summary of Main Issues and Concerns](#) section below.

Comment submissions were received by mail, email, and delivered in person at the scoping meeting and at the BLM office. Most submissions contained multiple comments on various topics. A total of 239 comments were received. All information gathered during and after the scoping period will be evaluated, verified, and incorporated into the EA, as appropriate.

Chapter 2

Scoping Results

Attendance Scoping Meetings

In total, approximately 215 members of the public, elected officials and representatives of government agencies and special interest groups attended scoping meetings held in November and December 2014. Details of attendance are provided in Table 2-1, Scoping Meeting Attendance, below.

Table 2-1 Scoping Meeting Attendance	
Meeting	Number of Attendees
October 7, 2014 Abbey Event Complex Cañon City, CO Fremont County	47
December 4, 2014 Cripple Creek Heritage Center Cripple Creek, CO Teller County	167

Written Comments

Two hundred thirty-nine comment letters were received during and after the Scoping Period by mail, e-mail, and the scoping comment card. Most submissions contained multiple comments on various topics.

Comment Summary

The official close of the scoping period was December 19, 2014. Scoping comments will continue to be accepted throughout the EA process and will be addresses as time allows. While a variety of issues were raised in the comments, several common themes were present. The main issues and concerns raised are summarized below.

Comments will be solicited from the public during alternative development, on the draft EA and on the final EA.

Summary of Commenters

The BLM received 239 written submissions during the initial public scoping period. Of the comments received, 215 were received from the general public, 14 from non-profit organization, 10 came from county, state, and federal government entities.

Summary of Main Issues and Concerns

The main issues and concerns expressed in the comment letters are described below. All comments were entered into a spreadsheet and organized by category. For this scoping report, the specific comments were grouped into similar topics identified below:

Noise: Day and Night

Noise concerns related to the duration, volume, vibrations, and time of day and night was the greatest concern among respondents.

Sense of Place

The second highest concern related to a fear of negative impacts to quality of life in the project area, disruption to quiet, calm and tranquility. Commenters expressed fear of the loss of tranquility for man and animal.

Wildlife

The effects on wildlife were also a major concern. Commenter's mentioned potential impacts to wildlife reproduction areas, migration routes and stress related to noise and disturbances. Concerns related to Mexican Spotted Owl and Lynx were described.

Livestock and Pets

Helicopter noise will disturb pets and livestock including, increasing the possibility of stampedes, spooking horses resulting in injury to horses or riders. Helicopters are described as an annoyance to pets and livestock.

Human Environment/ Impacts to Private Property

Potential intrusion of the project activities on private property, neighborhoods and individual homes were discussed. Effects of the project on the human environment were predominant concerns among the respondents. Effects on private property values were of great concern.

Fire Ignitions based on Helicopter Operations

People were concerned that there is a high potential for fire ignition. Individuals and agencies had questions surrounding who would pay to control a fire that might be caused by HAMET. Concerns were expressed about potential higher insurance premiums due to increased risk of fire. The public requested that no HAMET be performed if there is a high fire danger.

Safety Hazards

The public voiced concerns about the possibility for accidents resulting from HAMET that might result in loss of life and property. The commenters request that the Army disclose conditions that resulted in the 300 accidents in Afghanistan.

Recreation

Impacts to recreational activities such as: camping, hiking, rock climbing, horseback riding, wildlife viewing, and quiet recreation.

Economic Impacts

Economic concerns related to lower property values, and loss of revenue to businesses.

Land Use

General concern of the commenters: is this an acceptable use of public land?

Quiet: Natural sound scape

Concerns were stated regarding the loss of tranquility and solitude, in particular, as defined in the Wilderness Act of 1964. Complete soundscape analysis with special attention paid to recreation and wildlife.

Flight Communication Plans

The commenters requested better defined flight paths. Concerns were raised about conflicts with air ambulance and the Army helicopter activities.

Army Plan of Development Questions

- With the exit of troops from Afghanistan and Iraq is there a need for this training?
- There are similar elevations at Fort Carson to the picked landing zones.
- How close are helicopters landing to housing areas on base as compared to the HAMET project area?
- The Army has enough terrain to train on at Camp Hale, Camp Guernsey, Pinon Canyon, Cheyenne Mountain, Fort Carson and Air Force Academy.
- The POD is contradictory and inadequate; please review number of landings and MTAs.
- What other DOD will use landing zones? Who will track use?
- The Army has similar training in Hawaii, Fort Bliss, Lincoln National Forest, and Pike National Forest.
- Will the Army give public notice before training on BLM?
- Can the Army use simulators to teach this skill?

Biological Resources: Soils/ Water Resources

Will prop wash cause soil erosion, or create soil conditions that could pollute water? Other resource concerns include: soil compaction, loss of native vegetation, and increase in weeds.

Management Designation Conflicts (TMP, Zoning)

Do HAMET landing zones conflict with travel management areas, Wilderness Study Areas, Areas of Environmental Concern, or High Use Recreation Areas?

Visual and Aesthetic Resources

Concerns reference impacts to scenic touring on Gold Belt Scenic and Historic Byway, Four Mile Conservation Area, Pike National Historic Trail, Palmer Land Trust and surrounding area. HAMET could impact the conservation values and compromise the significant investment made to protect these areas.

Potential Accidents, Clean-up and Responsibility

Who responds, who pays?

Alternative HAMET Use Areas other than new use on Public Lands

Suggestions were made to use other less populated and other isolated areas of Colorado.

Legality of ROW as a Tool to Permit Use/Level of NEPA analysis

Questions were asked related to the legality of issuing a ROW for this activity.

NEPA Analysis

Cumulative effects of actions in southern Colorado need to be analyzed in the NEPA document. The NEPA document needs to be an EIS.

Archaeology

Concerns about impacts to archaeological resources such as Ute culturally modified trees, prayer and medicinal trees, Tabeguache Ute cultural, and vision quest sites. The Ute return each year for these ceremonies in the area.

Issues beyond the scope of this environmental analysis

- Distrust of Government – hiding information, back door deals, the Army is spying on me.
- Human Health - Helicopter noise could exasperate existing health conditions such as PTSD.
- County zoning.

Chapter 3

Where the BLM is in the NEPA process:

HAMET Project Status	
BLM Actions	Public involvement opportunities (comment period length)
	Scoping period
	Public scoping (30 days)
	Alternative development (30 days)
Develop draft EA	
	Draft EA comment period (15 days)
Develop final EA	
	Final EA comment period
Decision document	
	Protest period

Green = completed
 Yellow = in progress
 Red = future steps

Future Planning Efforts for the HAMET EA include:

Opportunities for public comment include commenting on Scoping Report and draft environmental assessment.

The BLM plans to issue draft alternatives to the POD for public comment. The draft alternatives will be posted on [the BLM HAMET website](#). The project mailing list will be sent a message and all the Home Owner Associations in the project area will be notified. Press releases will be issued.

BLM will develop and the release a draft environmental assessment for public comment and review. Time frame will be a 15 day review period.

Comments on the final environmental assessment include a public comment period, a regulatory appeal period and a protest period.

APPENDIX A

Press Releases

MEDIA ADVISORY

The Bureau of Land Management Royal Gorge Field Office and Fort Carson Army Base are hosting a media day to kick-off a public scoping period regarding the use of public lands for Army helicopter training. Fort Carson will be demonstrating take-off, landing and low-flight maneuvers. Since 2010, Fort Carson has used public lands for training on a temporary and infrequent basis. Fort Carson is requesting a longer-term agreement with the BLM.

Who: Bureau of Land Management and Fort Carson

What: VIDEO and INTERVIEW OPPORTUNITY

Where: Meet at Royal Gorge Field Office, 3028 E. Main Street, Cañon City, CO 81212. From the Field Office, we will caravan to a landing zone north of Cañon City.

When: Wednesday, October 1, 9:15 AM

Why: Fort Carson has submitted a proposal to use public lands for military helicopter training. As required by the National Environmental Policy Act, the BLM is analyzing this proposal in an open and public process.

Contact: Please contact Kyle Sullivan, BLM Public Affairs Specialist at (719)-269-8553 to RSVP for the event.

Press Release 1

FOR IMMEDIATE

RELEASE Sept. 29, 2014

Contact: Kyle Sullivan, BLM , 719-269-8553

Dani Johnson, Fort Carson, 719-526-4143

BLM public comment period begins, public meeting scheduled

CANON CITY, Colo. – The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson’s proposal to use public lands for helicopter training.

The BLM and Fort Carson are hosting a public meeting on Oct. 7 at the Abbey Event Complex, Benedictine Room, 2951 E. U.S. 50, Cañon City, CO 81212. The public meeting will run from 5:30-7:30 pm, with a presentation scheduled for 6 pm.

Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environment Training since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

This scoping period will run from Oct. 1 to Nov. 1, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-852-8531 or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts at <http://blm.gov/3zld>.

Press Release 2

FOR IMMEDIATE RELEASE - Nov. 19, 2014

Contact: Kyle Sullivan, BLM , 719-269-8553

Dani Johnson, Fort Carson, 719-526-4143

BLM extends public comment period for HAMET proposal and announces additional public meeting

CANON CITY, Colo. – The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson’s proposal to use public lands for helicopter training.

Based on public input, the BLM and Fort Carson are hosting a second public meeting on Dec. 4 at the Cripple Creek Heritage and Information Center, 9283 State Highway 67, Cripple Creek, CO 80813. The meeting will run from 4:30-7 p.m., with a presentation scheduled for 5:30 p.m.

Fort Carson has been using public lands in the Royal Gorge Field Office for High Altitude Mountain Environment Training since 2010. In 2013, Fort Carson requested a longer term agreement with BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment and alternatives before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

This scoping period will run from Nov. 19 to Dec. 19, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts at <http://blm.gov/3zld>.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

APPENDIX B

Public Comments

DEC 24 2014



AARON MANDEL
ACTING CHIEF
S.P.C.F.P.D.

P.O. Box 11
Guffey, Colorado 80820
Phone (719) 689-9479
Email wildfire@guffeyfire.net

December 22, 2014

Nancy Keohane
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO. 81212

Ms. Keohane,

This letter is in regards to the conversation we had on December 8th of this year about the proposed HAMET project operating on BLM lands. Per your request this letter is to state the concerns of the Southern Park County Fire Protection District formally to you and the military. Our goal is to make sure plans are in place and responsibilities assigned so that in the event of an accident we all have clear direction on who is in charge and what responsibilities our district would have.

One of our concerns is will the HAMET program affect our use of air ambulances? Our district is only able to provide basic life support so when we need a higher level of medical response we rely heavily on Flight for Life. If these training flights, conducted by the military, restrict air access to our community it will endanger our patients' lives. Paramedics would have to come from Fairplay, Cripple Creek, or Divide. The time it takes to get to our district from these locations and to a hospital could cost lives and affect patient outcomes.

Another concern is in the event of a crash on private lands in our district who is responsible? Our district is understaffed and we have limited resources to respond to a helicopter incident. In addition, if a crash were to turn into a wildfire, who is responsible for covering the cost of fighting that wildfire? As we are all aware wildfires can be very costly to fight and our agency cannot bear those costs. If the wildfire were on BLM land would the district be working under current CRRF agreements where we provide mutual aid at no cost for the first 24 hours and bill after that? If so, who do we bill? Our district can not afford to have the HAMET program become a financial burden on our department.

These are the main concerns of our district. I'm sure all of our concerns can and may already be addressed through memorandums of understanding and mutual aid agreements, but we need to clarify these concerns. I look forward to meeting with you again as this process moves forward and appreciate all the hard work you are putting in to get feedback from affected Emergency Services.

Respectfully,



Aaron Mandel
Acting Chief
Southern Park County Fire Protection District (S.P.C.F.P.D.)

December 18, 2014

Re: HAMET Training Proposal Response

To whom it may concern:

I have recently been made aware of the US Army, Fort Carson Post requested for permanent Right of Way for usage of BLM administered lands in the Teller, Fremont, and Park county areas for the HAMET program. This program and lands affects would encompass a large area that is relatively heavily populated when it military use standards, in effect impacting potentially 1000's of private landowners, their families, businesses (cattle and horse operations, hunting guides, etc.) and livelihoods, not to mention completely changing the landscape to which these people have chosen to live. I am one of these property owners and am deeply disturbed by not only the proposal, but also the means to which it is being done. We own several hundred acres of ranch land with a small home, just outside of Guffey, CO which would be directly affected by these proposed operations.

I consider myself a patriot and huge supporter of the US Military. My family has deep military roots (my father was a US Navy Commander, my wife's cousin a US Navy Seal, and many other family members either active or retired military) so I understand the importance of training and preparing our military service members for whatever challenges they face. However, I also believe there are many other locations to which this type of training would be better suited without directly impacting so many private citizens who have worked their entire lives to live in this beautiful part of our state.

We purchased the land we currently own to live, work, hunt and enjoy in peace. Not to have it turned into a military training site. I understand that the actual "landing zones" are on BLM lands; however the full operations will dramatically affect everyone around these landing zones. With helicopters flying extremely low over homes, cattle, horses and wildlife it will change this area and the living conditions dramatically. It could make it impossible to continue our current cattle operations, may make it unsafe to ride our horses, sleeping would become impossible when flight operations are present, the potential for having pictures rattled off the wall, etc. is completely unacceptable. The impact to the wildlife that we love and depend on would be greatly impacted. Our family works hard to protect the natural resources on and around our property and we rely on these natural resources to provide food and income. This would be changed forever if the HAMET Right of Way is granted.

As recently as last year, we had friends of our tell us about helicopters flying in low (50-100 feet above the ground), hovering and/or landing close to their home, and having military members climbing in and out of these helicopters and ALL hours of the day and night. Can you imagine the fear that would come from being woke up in the middle of the night by a low flying

helicopter and seeing military members climbing out and “securing” the landing zone? It would feel like World War III had begun or something similar. Now imagine you are a war veteran who had served our country admirably, been honorably discharged and who chose to move to an area of peace and quiet to forget the horrors seen in combat. To suddenly have to relive all these horrible memories and fears is a dishonor to that service member.

We have also recently been informed by the BLM, that lands surrounding our property have been designated “Foot & Horse” ONLY lands as part of an effort to minimize the impact on these lands. Some of the same lands now being proposed as landing zones for the HAMET Right of Way. I now see a double standard being set by the BLM if they are not willing to allowing us; neighboring landowners who are directly impacted and have a desire to maintain and improve the surrounding BLM properties, to even utilize existing roads in order to check cattle, fencing, etc. But then the BLM is willing to allow the military to take these same lands and turn them in to landing zones for military operations which will likely cause extreme damage to the resources (land damage; water contamination; changed wildlife behavior including breeding, calving, and wintering grounds) which directly impacts ALL the surrounding landowners is completely irresponsible of the BLM and in many ways goes directly against their responsibility to maintain the public BLM lands. In addition, there is the safety concern of all of the surrounding landowners, their cattle and property should (Heaven forbid) an accident happen. I know there is an inherent risk to all military members during these types of operations, but it is not fair to the public to expose us to these risks when we have no option to mitigate or avoid the risk.

For all the reasons stated above, I am completely opposed to the BLM granting the US Army the HAMET Right of Way in the Teller, Fremont and Park County areas. The US Army, BLM and other government agencies need to complete a search for better suited lands which will not impact 1000’s of private residents. They exist all across the Western United States and many are in close proximity to the Fort Carson Post.

Regards,

Robert & Heidi Posavad
Aspen Meadows
Guffey, CO 80820
rposavad@gmail.com
720-234-6640



HAMET - public comment

KLStolle <leighstolle@yahoo.com>

Thu, Oct 30, 2014 at 1:51 PM

Reply-To: KLStolle <leighstolle@yahoo.com>

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

30 OCT 2014

ATTN: HAMET
Bureau of Land Management
Royal Gorge Field Office
3028 East Main St.
Canon City, CO 81212

To whom it may concern,

As a member of the public, a frequent visitor to local BLM land, and an area landowner, I'm writing to express my strong opposition to the US Army Fort Carson's proposed use of public land (per "Exhibit 1, Area of Activity" and "Exhibit 2, Helicopter Landing Zones" PDFs) for helicopter training (HAMET).

Allowing helicopter training in the BLM areas indicated would be detrimental to and negatively impactful upon the populations that currently enjoy and/or inhabit the land -- including

- tourists, whose dollars support this area;
- local residents / recreationists who value and utilize BLM land;
- and flora and fauna, much of which is already struggling after years of drought and disease.

The HAMET proposal would, at the very least, mean visual pollution, noise pollution, and air pollution, the first two of which I can personally attest to as already being significant and disruptive in the "casual use" arrangement currently in place in this area. Allowing the training to expand would create a noisy, disruptive, warzone atmosphere in the skies and on the hillsides of this area of Colorado, which would be

- detrimental to the economies of the surrounding communities;
- negatively impactful upon the quality of life and health of the human, animal, and plant populations that enjoy and/or inhabit these areas.

In closing, I ask that the BLM reject the HAMET proposal in the interest of preserving and protecting the spirit and current use of this land. Thank you for allowing my input.

Sincerely,
Kathleen Stolle

leighstolle@yahoo.com

19 December 2014

Ms. Nancy Keohane
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Cañon City, Colorado 81212

RE: HAMET activities on BLM lands in Park, Teller & Fremont counties.

Dear Ms. Keohane:

My husband and I have recently purchased land in the Guffey area, with plans to build our home and keep our horses in this beautiful and pristine area within the next few months. We were interested in this particular piece of property partly due to its close proximity to BLM lands, where we wish to ride our horses in peace and tranquility.

The HAMET proposal to utilize the BLM land is alarming, and I wish to add my voice to the others in the Guffey area who have expressed concerns regarding the impact of this program. **I do not wish BLM to approve this request.** The environmental impact, as well as the noise and fire potential do not, in my opinion, fit with the BLM mission, "To sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations."

Thank you for allowing public input for the HAMET proposal. Please deny their request.

Sincerely,

Laurie Bratten
Current: 9505 Shoofly Lane, Wellington, CO 80549
Future: 202 Doe Drive, Guffey, CO 80820

December 19, 2014

Ms. Nancy Keohane

NEPA Specialist
Royal Gorge office of the BLM

Subject: proposed HAMET over our properties.

Dear Ms. Keohane,

I am a resident of Autumn Creek Ranch I moved here to fulfill my retirement plans that I have had for most of my adult life. I moved here for the serenity and beauty of the area. I have just completed building my retirement home and hopefully my last place of residence. I moved here to ride my horses both on the ranch and to enjoy the BLM land adjoining our Ranch.

If this low altitude flying occurs over my property to get the HLZs I feel my life would be endangered by the low flying helicopters. It is impossible to desensitize a horse to a helicopter flying overhead without a tremendous amount of training. My horse doesn't even like the UPS truck what would she do with a helicopter flying around her. I could be injured or even killed if she were to panic. I could be bucked off and left unconscious on the ground, break a leg or my back and be paralyzed for the rest of my life. Riding is a risky enough sport. I don't need to add the added danger of helicopters to worry about.

I have invested my money into this property and since I am retired I have no way to replace that money. Property values will go down so when it comes time for me to move closer to town because I can no longer care for the property I am depending on being able to sell and have money to buy a smaller place and support myself when I am older. I may not even be able to sell because no one will want to live here. Had I known this was going to happen I never would have built here.

I have put more than \$500,000.00 into this place and the economy here since I bought the property. Is the BLM willing to pay me what I would lose if I couldn't sell the property so I don't end up on the streets when I am in my 70's? I seriously doubt that! I understand the need for the military to train but The BLM needs to understand the citizens who live here have a right to live here in peace and quiet.

Thank you taking my comments seriously,

Karen Green

Autumn Creek Ranch resident

Cc: Ed Norden and Kenneth Kimber



HAMET Comments

Scott Adams <adams.sa@juno.com>

Fri, Dec 5, 2014 at 1:06 PM

To: rgfo_comments@blm.gov

Nancy,

I submitted one of these comments in written form last night (CommentFormSubmitted...). This is essentially the same, but with errors I made while writing fast corrected. The second is the verbal comments I made (Comment_Sum...). Rep Lamborn's office asked for a written summary and it would be appropriate for you to have them, also.

I have sanitized both so please DO NOT release my person information.

I would be happy to help, or answer questions and you may email me back if I can.

Thanks.

Scott Adams

2 attachments



CommentFormSubmitted_san_12-4-14.docx

16K



Comment_sum_12-4-14_san.docx

18K

Comment Form Submitted:

Board Member of Pikes Peak Historical Society
18033 Teller County Rd 1,
Florissant, CO, 80816,
(719)748-8259

- 1) There are numerous Ute Indian cultural sites scattered around the area. These sites include medicine wheel vision quest locations, Ute defensive fortifications, culturally significant prayer trees. These sights need to be researched and the sights catalogued and avoided in accordance with the Antiquities Laws and Regulations (e.g.: Antiquities Act, 1906, Archaeological Resources Protection Act, National Historic Preservation Act of 1966, Native American Graves Protection).
- 2) The Colorado Air National Guard already does HAMET out of the Eagle County Airport. That training is far more effective. Any training below 10,000ft does not remotely simulate conditions in Afghanistan. Two units doing the same training is a waste of taxpayer money.
- 3) Minimum altitudes over denser population areas (most of Teller County and large sections of Park and Fremont Counties) should be at least 1,000ft AGL. Consider cross-referencing FLIP AP/1 to compare minimum altitudes on the low level training routes that crisscross the area. Those routes were raised in the 80's because of increased population density.
- 4) Careful consideration should be given to population density - do not use older maps (anything older than 2010 is woefully outdated) to select landing zones or ingress and egress routes

I write these comments with the experience of 26 years and nearly 4,000 hours of Air Force tactical aviation jet time, most of it in the A-10. I also led the organization that makes military aviation maps so I know how out-of-date those maps are.

Summary of Comments Made at the HAMET Public Meeting

Heritage Center, Cripple Creek, CO; 4 Dec 2014

I preface these remarks by stating that I have lived in Florissant for nearly 10 years. My wife and I grew up in Colorado and after 13 Air Force moves in the 26 years mentioned below we spent less than 3 of those years in Colorado. I retired and we moved back in 2005. Even though our house is 13 miles away from any of the landing zones, we do have helicopters (Blackhawks by sound) occasionally fly over our home, dwell in the area, and even hover very close to our home. It is important that the people in the area recognize the need for military aviators to train for combat aggressively and effectively. Some noise will be inevitable, but it shouldn't be something that detracts from a comfortable life. If done right, people will recognize the training being done and be proud that it's happening in their "back yard." Done wrong, there will be an adversarial relationship.

Of my 26 years in the Air Force, I spent more than 20 of them flying the A-10 (about 2,500 hours), a lot of the time at 250 to 500 feet Above Ground Level (AGL) over Europe, Alaska, and the southwest US. People who aren't used to seeing aircraft at that level often think they are lower than they are, especially when the aircraft is moving very fast, or very slow. From the cockpit 500' AGL seems incredibly high to the pilot. From a combat perspective it's high enough, in a threat environment where low altitude is necessary, to feel very exposed. At lower altitudes (250 - 300ft AGL) a pilot is busier, but it still seems relatively high. Most pilots are aware that people on the ground perceive it differently than the pilot and make every effort to avoid people and animals whenever possible.

There are things that can be done to make the HAMET proposal more palatable to local people. First, the maps used to determine where to place Helicopter Landing Zones cannot be accurate enough to show the growth of development in the local area, especially in Teller County, but likely in Park and Fremont as well. There are commercial imagery products that BLM could probably access (maybe not the US Army, posse comitatus?). But the Army owes it to the public to carefully examine the area around each HLZ (road trips/helo visits with locals) to make sure the zones don't have homes or livestock near them. There is enough real estate around to make sure that happens. Finally, the 1000M (about 5/8 mile radius) area in which pilots can go as low as Nap of the Earth (NOE) flight is probably excessive, at least where the HLZ is near (audible from) homes. The Army would do well to make the volume of flight more reasonable (to reflect what Capt Mathews actually projected) than the "high ball" number of 1,440 in the proposal. It might also make the proposal more acceptable if it included a visible and written plan to rotate HLZs.

I believe the Army and Ft Carson (4 ID) can maintain disciplined flight and correct local pilots who make a mistake, or intentionally violate the rules. But, I am concerned about visiting pilots. My experience working with visiting aviators at National Training Center (NTC) and COPE THUNDER exercises in Alaska, as well as Navy and Marine pilots, in particular, is that they will be more difficult to keep in control. When pilots are deployed they tend to be less concerned

about noise complaints because “they don’t have to live with it.” The HAMET environment may be more a “training” than combat oriented exercise environment and so that pilots might be more likely to comply with rules. My experience with Navy and Marine pilots, (Special Ops, too), in general, is that they are less concerned about such things than Air Force and Army pilots. 4th ID should develop and be able to convince everyone of the fact that they have very strong systems in place to ensure compliance and enable discipline.

Finally, I am concerned that HAMET seems to becoming the “training du jour.” There has been a well-established high altitude helicopter training program operated by the CO ANG out of the Eagle County airport for many years. They operate in an environment that is far more similar (elevation-wise) to the environment in Afghanistan than the 8-10,000 foot elevations in Teller and Fremont counties. They fly over the ski area I work at and around the ridge-lines above it routinely. The BLM rep mentioned a similar proposal being reviewed in Lincoln National Forest in New Mexico. It appears that there may be many organizations trying to justify their existence with a training program only one needs to provide. That would be a significant waste of taxpayer money.

October 31, 2014

Attn: HAMET
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO 81212

The request for a permanent grant of Right of Way for use of BLM-administered lands in Teller, Fremont, and Park counties for use by the Army's HAMET program would appear to be a de facto expansion of the Fort Carson military base. The scale of the landscape impacted by this proposal far exceeds the 234+ acres involved in the 43 specified landing zones: the boundaries of the Mountain Training Areas (MTAs) outlined in maps provided by the Army encompass thousands of acres (the tally of acreage is, rather conveniently, not provided in the Plan of Development documentation). These MTAs include extensive private property holdings. According to the Plan of Development, "A large portion of the qualification course (HAMET) requires aircrews to conduct Mountain Navigation as a task" (3.f). Mountain Navigation calls for low-level flights, as low as 80 feet, which would be permitted throughout the MTAs, apparently without regard to the individual or agency who owns the underlying property. The ramifications of this plan extend well beyond the land holdings of the BLM, and the grant of Right of Way by the BLM for the Army's plan as it is written is clearly an overreach. A BLM Right of Way agreement does not address the effects of noise and the sudden appearance of fast-moving helicopters that will occur throughout the MTAs, including over private property.

Assuming, however, that the current review process is the appropriate and legal channel for this action, I do not see how the Plan of Development can be reconciled with the BLM's mission to "manage and conserve the public lands for the use and enjoyment of present and future generations under a mandate of multiple-use and sustainable yield."

From a wildlife management standpoint alone, disturbances from an annual minimum of more than 2100 proposed landings, with associated low-level exercises and transit flights, should be grounds for rejecting this Plan of Development. Noise from flights transiting to and from the landing zones at the specified minimum altitude of 500 feet would qualify as a "highly" annoying to a significant proportion of people, based on the Army's noise study—which does not account for potential amplification of noise by the mountainous terrain. Wildlife sensitivity to noise will be even higher. Direct effects, such as panicked flight into fences or ravines, will cause injuries and death not only around the landing zones but also throughout the much larger MTAs as a result of low-level flying. More indirect impacts on migration and feeding patterns will undoubtedly occur throughout the MTAs, violating the ideal of sustainable yield.

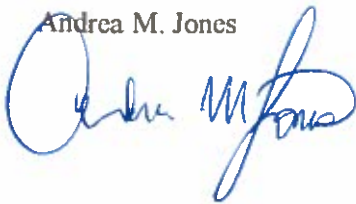
Disruptions of game species will, in turn, affect hunting, which is a part of the BLM's multiple-use mandate. Other conflicts with multiple-use include livestock grazing (cattle will be subject to the same disruptions as wildlife) and outdoor recreational activities. Given the potential for "continuous sorties throughout the year" (Section 3.c.1), hiking, camping, biking, and horseback riding will be virtually impossible around the landing areas, where helicopters will be allowed to fly as low as 25 feet in Contour and Nap of Land maneuvers. Noise and fast-moving aircraft will, once again, affect all users (and landowners) throughout the MTAs, which extend from Highway 50 to northwest of Cripple Creek. Helicopter noise will extend to Cripple Creek, Victor, Cañon City, and the Gold Belt Tour Scenic Byway, with potentially significant economic implications for the region's tourist economy. At a time when Cañon City is trying to build a reputation as an outdoor recreation destination, granting permanent military use of vast swatches of the local landscape is counterproductive.

On a more personal note, the MTAs lie to the east, south, and west of our property. Having experienced HAMET operations conducted under the Casual Use agreement between the BLM and Fort Carson in 2012, I am aware of the effects of helicopter flights in this area. The noise and disruptions from low flying aircraft under the proposed plan would mean a wholesale lifestyle change for us and our neighbors. We will be affected by virtually all of the proposed flights, since helicopter landing activity in Training Areas 7 and 4 is audible at our home throughout the landing operations, and use of areas 5, 6E, and 6W typically involves overflight of the area where we live. Noise will affect our local wildlife populations, which include elk, deer, bighorn sheep, bear, mountain lions, and bobcats in addition to smaller mammals and birds. I work from home, and noise and disruptions from helicopter traffic threaten both the natural ecosystems about which I write and the conditions of serenity that enable that work. Having experienced multiple violations of the 500' minimum flying altitude during the 2012 operations, I am concerned that the current Plan of Development offers no provision for landowner recourse when such violations occur. This is of particular concern because we own horses, who are subject to bolting when a helicopter blasts over the ridge. This is not only is a risk to the horses' safety but also to that of me and my husband if we are riding at the time.

This area is a patchwork of public lands, ranches, and rural subdivisions. Undeveloped areas provide wildlife habitat as well as scenic beauty, outdoor recreation opportunities, and pasture land. People move to a place like this in large part because it is quiet. The HAMET program is not only a direct threat to quality of life, but will also impose negative economic pressures on residential landowners. Land values are based largely on intangible aesthetic factors such as scenic vistas, intact natural areas, and serenity. Although helicopter flights don't necessarily ruin the view, their disruptions to local ecosystems and quietude certainly conflict with other perceived values. Residents—particularly those with property inside the boundaries of the MTAs—will likely see property values decrease, and those who might elect to move to escape the noise may find it difficult to sell their property at market values comparable to either historic levels or to areas that are not encumbered by what will be a military exercise zone, in fact if not in name.

If the BLM does decide to grant a Right of Way for this program—and, again, I question whether the agency has the authority to permit a program with such extensive implications for private landowners—restrictions should be put in place that limit flying days, either in the form of specified flying periods or a defined number of days that flying is allowed on an annual basis. The 2012 operations set a precedent for the former model. While the intensity use during those periods was unpleasant and doubtless put enormous stress on the wildlife of the area, I feel that regulating flying days in this way is a lesser evil than granting the Army an unrestricted Right of Way for “continuous sorties throughout the year” over a landscape loved by me and my neighbors.

Andrea M. Jones



High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environmental Training (HAMET) since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office Office at: <http://blm.gov/231d>

This scoping period will run from Nov. 19 to Dec. 19, 2014. Comments concerning the proposed action, alternatives and identification of issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

My concerns about this whole proposal is the following:

- 1. Current maps associated with 2014 not 4-10 years old.*
- 2. An environmental impact regarding noise, population, damage to the land, effect on wildlife and migration zones.*

Most of the people moved up to this area for peace and quiet. Our housing projects and evaluations will suffer because of the noise. I'm sure there is other sights more acceptable for this type of training -

October 31, 2014

Nancy Keohane
NEPA Specialist
Bureau of Land Management
3028 East Main Street
Canon City, CO 81212
rgfo_comments@blm.gov

VIA USPS & EMAIL

**RE: Scoping Comments for Bureau of Land Management / Department of Defense
HAMET project:** <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

Dear Ms. Keohane:

Not 1 More Acre! (“N1MA!”) submits the following comments in connection with the Bureau of Land Management’s scoping process for the proposed High Altitude Mountain Environment Training (“HAMET”) project.

N1MA is a non-profit organization formed to promote the ecological and economic health of southern Colorado and northern New Mexico, including the area in and around the Joint Forces Piñon Canyon Maneuver Site (“Piñon Canyon”).

On April 23, 2008, N1MA and several of its individual members filed a lawsuit against the Army in the United States District Court for the District of Colorado. That lawsuit (Not 1 More Acre! v. United States Department of the Army, D. Colo. Case No. 08-cv-00828-RPM) involved the Army’s failure to comply with NEPA before approving the use of Piñon Canyon for various training purposes.

The Court ruled in N1MA’s favor on all issues, and, in so doing, it invalidated the Army’s reliance on a 2007 document titled “Final Piñon Canyon Maneuver Site Transformation Environmental Impact Statement” (the “2007 EIS”). The Court also awarded N1MA approximately \$200,000.00 in attorney fees.

N1MA’s scoping comments on the HAMET project are as follows:

1. Material on the HAMET project website <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html> generally refers to “the planning stages for the preparation of a National Environmental Policy Act (NEPA) document...” The material does not state whether BLM plans to prepare an Environmental Assessment (“EA”) or a more thorough Environmental Impact Statement (“EIS”). The Plan

of Development (“POD”) prepared in connection with the HAMET project makes it clear that HAMET would involve use of public lands that contain sensitive resources and, further, that significant environmental consequences are likely to result from that use. Accordingly, N1MA urges BLM to proceed directly to the preparation of an EIS.

2. The HAMET project is closely connected to several other proposed and ongoing projects involving military training and infrastructure in southeastern Colorado, including, without limitation (i) proposed training and infrastructure activities at Piñon Canyon (for which a Notice of Intent to prepare an EIS was published in the Federal Register on March 25, 2014, and which Notice of Availability was issued this very day, October 31, 2014); (ii) proposed training and development at Bullseye Auxiliary Airfield (for which an EA and FONSI were recently issued); and (iii) a series of no fewer than twenty-four NEPA reports, including the Programmatic Fort Carson Combat Aviation Brigade (CAB) Stationing Implementation and the PCMS Transformation Environmental Assessment that purport to study the relationship between military training and environmental impacts at the PCMS, for all of which Not 1 More Acre! has participated in review, provided comments, and initiated litigation due to inadequate DOD documentation. BLM must consider HAMET cumulatively with these actions and their impacts.

3. The HAMET project will have impacts on noise, wildlife, land use, air quality, and biological resources, and on other aspects of the human environment. These impacts will not be limited to Landing Zones. BLM must take a hard look at each and every potential direct, indirect, and cumulative impact of the HAMET project. For example, local bare ground and widespread dust generated by helicopter downdrafts can later propagate soil erosion across connected landscapes to impact larger spatial scales. This wind and water erosion has differential effects on plant community distributions and associated consumer populations, as well as on soil carbon, soil water-holding capacities and drought susceptibility. Wildlife species have differential sensitivities to aircraft noise and visual disturbance, which can lead to altered predator-prey relationships and disruption of seasonal migratory patterns and distributions. Flight routes to and from landing zones, as well as low-altitude flight training, can affect land-use by wildlife, recreationists, and resident human populations. Selection of landing sites as well as flight patterns must account for potential and established wilderness areas, wildlife and human land-use, and soil and vegetation sensitivities. Fire mitigation needs to be viewed not only in terms of restricting training when fire danger is high or in the event of a crash, but also include consideration of exhaust and spark ignitions and personnel actions. Timing of training exercises also needs to consider avian nesting periods and locations and ungulate movement periods as well as soil compaction (wet) and dust generation (dry) periods.

4. NEPA requires that BLM consider reasonable alternatives to the HAMET project. N1MA respectfully submits that the range of alternatives considered in BLM’s NEPA document must include alternatives that recognize existing HAMET training elsewhere, alternatives

that would reduce the frequency of the HAMET program, and alternatives that would avoid the use of public and non-military land altogether.

5. NEPA requires coordination with other local, state, and federal environmental review and permitting processes. Here, the BLM must coordinate its NEPA process with the processes needed to comply with the Federal Land Policy and Management Act, the Endangered Species Act, and the National Historic Preservation Act, among others.

Thank you for this opportunity to provide scoping comments on the HAMET project. N1MA looks forward to further opportunities to review, comment, and participate in the project planning and review process.

Sincerely,

[Original signature by USPS]

Jean Aguerre
Director
Not 1 More Acre!
PO Box 773
Trinidad, Colorado 81082
email: news@not1moreacre.net



Re: HAMET in vicinity of Lakemoor West Subdivision

Keohane, Nancy <nkeohane@blm.gov>

Thu, Dec 18, 2014 at 4:45 PM

To: Michael Allen <mballen7@gmail.com>, BLM_CO RG_Comments <rgfo_comments@blm.gov>

Thank you Mr. Allen for your important thoughts on the Fort Carson proposal. I will add your name to our mailing list and we will be back in touch when we have something more to review or news about the project.

Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Thu, Dec 18, 2014 at 1:34 PM, Michael Allen <mballen7@gmail.com> wrote:

My wife and I own a home in the Lakemoor West Subdivision. We are concerned that the proximity of the proposed HAMET landing zones will adversely affect this area where there is a high density of homes and that our location is in a Very High Risk area for wildfires. In addition, the anticipated altitude and frequency of low level flights would definitely make our neighborhood a less habitable place to live and in all likelihood substantially reduce our property values.

I am a thirty-year veteran of the US Army. I greatly appreciate the need for appropriate aircrew training at high altitudes. My family and I have lived in housing at many Army installations both in the United States and overseas, sometimes in close proximity to military airfields, all of which had extensive helicopter training activity. Family housing is not placed as close to airfields on those installations as the nearest HAMET landing zones are to our house and many others in the area that is being considered.

My judgment is that the impact on quality of life in our neighborhood under HAMET would be worse than the effect on base housing near the airfields at any of the installations on which we have lived.

Thank you for considering our concerns,

Michael B. Allen, Col, US Army, Retired

Nanette L. Allen

Thank you for considering our concerns,

Michael B. Allen, Colonel, U.S. Army, Retired

Nanette L. Allen

mballen7@gmail.com



Tallahassee Area Community, Inc.
Fremont County, Colorado

Board of Directors
P O Box 343
Cañon City, Colorado 81212
www.taccolorado.com

8 December 2014

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Office, Bureau of Land Management
3028 East Main Street
Cañon City, CO 81212

Transmitted via email attachment: rgfo_comments@blm.gov

Cc: CWO 4 Kenneth Kimber
Aviation Mission Survivability Officer
kenneth.w.kimber.mil@mail.mil

Cc: Ed Norden
Fremont County Commissioner, District 3
ed.norden@fremontco.com

Subject: Comments re: High Altitude Mountain Environment Training NEPA

Dear Ms. Keohane:

Tallahassee Area Community (TAC) appreciates the opportunity to comment on the U.S. Army HAMET proposal.

TAC is a Colorado Not-For-Profit corporation representing the residents and property owners in the Tallahassee area of northwest Fremont County -- an approximate 80 square mile area due west of CO Hwy 9 and centered on Tallahassee Road (FCR 2).

From the maps provided as part of the proposal, we have determined that much of the private land within the Military Training Areas (MTAs) 6E and 6W is the Tallahassee area, and is accessed by FCR 2, FCR 21, FCR 21A, FCR 26 and

numerous private roads maintained by the many Property Owners Associations and the three remaining large cattle ranches in the area. There are approximately 600 large rural residential parcels within the area with more than one-third of them currently utilized as full time or part time seasonal residences.

While TAC acknowledges the necessity for HAMET, we believe that both the Army and BLM have failed to recognize and appreciate the existence of our rural residential community and the adverse impacts to be reasonably anticipated from the long term low-altitude overflights of military helicopters en route to their various exercise Landing Zones.

Below please find our specific comments and concerns:

1. Although the proposal is a U.S. Army/BLM program, we are disappointed at the lack of community outreach within the affected areas and the very short public comment period. TAC first became aware of the proposal via our website from a Teller County rancher attempting to spread the word. We received an email on December 3rd notifying us of the Cripple Creek public meeting on December 4th and the close of the public comment period on December 19th.

2. From the limited description provided of the HAMET procedures, it appears that within any MTA there would be very low altitude terrain following exercises -- both during the day as well as at night -- prior to the landing exercises at the various LZs. Please be advised that the majority of our residents purchased their property and moved to our rural area -- many from out-of-state -- for the express purpose of being distanced from the noise of civilization. Being subjected to the excessive noise and air pollution from low flying military helicopters on a regular basis does not contribute to the tranquility of our rural lifestyle.

3. In addition to the adverse impacts on our residents from noise, fuel exhaust air pollution, vibration, and blowing dust, the impacts on domestic livestock are a major concern. Many of our residents raise horses -- including some very valuable show horses, llamas, alpacas, and egg laying chickens. There are economic issues involved as well as health & safety concerns.

4. A local cattle rancher has the grazing lease for much of the Tallahassee area as well as a very long term grazing lease relationship with BLM on the precise terrain as the MTA 6W. He is concerned that the HAMET program will severely damage his economic livelihood as well as physically harm his cattle herd.

5. There is a multi-million dollar facility constructed by the Benedictine Fellowship of St. Laurence located on the southern edge of Tallahassee, on Tallahassee Creek, that holds religious retreats, services in their chapel, and other functions throughout the year. The HAMET exercises would clearly be incompatible with their religious activities.

6. Two of our residents are familiar with a number of Native American burial sites in the Tallahassee area. They have expressed concern about the likelihood of the down-draft from low-altitude helicopter flights disturbing and desecrating the sites by unearthing and scattering the remains. -- especially in times of drought.

7. Please take note that there are approximately a dozen 40-50 year old unremediated small scale open pit abandoned uranium mine sites in Tallahassee. The exposed, sparsely vegetated, tailings and earth overburden piles have been confirmed by CDPHE to emit gamma radiation at a rate from three to thirty times the ambient level of the surrounding property. It is inevitable that when a low flying helicopter passes over these piles, radioactive dust, soil, and debris will be scattered over a wide area.

Our final comment relates to our major concern:

8. Tallahassee is the retirement location of many military combat veterans -- including many Vietnam vets. A number of them have longstanding health issues related to their military service, including some related to helicopter associated combat. They, and TAC in general, are particularly distressed at the prospect of close encounters with the sounds, smells, and appearance of very familiar -- and unwelcome -- military helicopters near their homes. We believe that it would be unconscionable for the federal government to subject these heroes to further physical and emotional trauma.

In conclusion, TAC believes that there are many areas in Fremont and surrounding counties that would be much more appropriate for HAMET than Tallahassee. Please relocate the MTAs identified as 6E and 6W to a non-inhabited area.

Again, TAC thanks you for the opportunity to comment and we trust that the BLM and the Army will give serious consideration to our concerns.

Sincerely,

s/ Lee J Alter

Chairman, Government Affairs Committee
for the Board of Directors of Tallahassee Area Community

0489 Fremont County Road 21A
Cañon City, CO 81212

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environmental Training (HAMET) since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office Office at: <http://blm.gov/23ld>

This scoping period will run from Nov. 19 to Dec. 19, 2014. Comments concerning the proposed action, alternatives and identification of issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments: ~~propose~~

LYNX
~~lynx~~ is endangered, and in these areas.
So are ELK herds— Also ranches with
cattle & "caving" in the ^{late winter &} Early Spring and lactating for
Also the ^{Geld} ~~sun~~ belt Tour is very close ^{months afterwards}
to the area. This is toured by buses.

Get up data information

701-705 710 = 46 houses in these areas.

These landing zones should not be considered because there are homes in or close by.

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environmental Training (HAMET) since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

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Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

Will you be flying at max. Height in all residential areas? ex. - Homes more than 300ft. from one another?
When will this project start?

RECEIVED

OCT 30 2014

Keith
Nancy

NETB

10-28-2014

Bruce Goforth

12500 CR 251

Salida, CO 81201

BLM Royal Gorge Field Office

3028 E. Main St.

Canon City, CO 81212

RE: Fort Carson HEMAT Proposal for Teller, Park and Fremont Counties, CO

ATTN: Keith Berger, Field Manager, Royal Gorge Management Area

Dear Mr. Berger:

I am writing to comment on the proposal referenced above, in association with the US Army, Ft. Carson, CO. My comments are based on limited web site information provided by BLM on this project, and on an article published in the Mountain Mail, Saluda, CO. As you know, I am a retired Colorado Division of Wildlife biologist and supervisor who has most recently interacted with you and your staff regarding Over The River, OTR, in Chaffee and Fremont Counties. My comments are as follows:

LANDING ZONES- I am most interested and most knowledgeable regarding the landing sites proposed in the Table Mountain area of Fremont County. These sites are adjacent to the Arkansas Canyon Lands Area of Critical Environmental Concern, and just north of Mc Intyre Hills Wilderness Study Area (WSA), and up slope from where intensive habitat manipulation/research for bighorn sheep is currently taking place. The goal of BLM and Colorado Parks and Wildlife with this work is to move sheep in the North River Sub-group from along the Arkansas River, up on to Table Mtn. I counted more landing sites proposed here than in any other of the landing zones being proposed. I believe this helicopter landing activity has the potential to significantly interfere with sheep movements and use of this general area. While data to date does not, to my knowledge, indicate that sheep have moved up drainage from the river to Table Mtn., that movement and use is the stated goal of BLM and Colorado Parks and Wildlife (CPW), especially if OTR activities do take place in the Coaldale to Parkdale stretch of the river. HEMAT activity in the Table Mtn. area will be directly at odds with sheep management objectives/OTR mitigation, and may violate ACEC protocols.

FLIGHT CORRIDORS: I did not see any information as to flight corridors to be used for accessing the landing zones/sites. Impacts to wildlife and to various publics who live and recreate in the zones/sites may be caused as much through overflights to the sites, as by the actual landings at the sites. Depending on the above ground flight levels, big game animals and avian species, in particular, may be significantly and negatively impacted as helicopters fly over. Wildlife species of this sort typically show a high degree of startle response and flight away from disturbances caused by helicopter noise and prop wash. This may result in stress, energy impacts from flight response, and potential loss of habitat, especially if flight and landing activities are frequent. It is essential that flight corridors to the proposed landing sites be identified and evaluated for impacts to wildlife and to various publics.

MORE REGARDING WILDLIFE IMPACTS: While I have mentioned bighorn sheep, especially the North River Herd, other big game animals such as deer and elk may be impacted by HEMAT operations, especially during certain times of the year such as birthing and wintering. If flights are allowed in some quantity where big game is present, those flights should be curtailed and/or eliminated at sensitive times of the year. This is also true for avian species such as raptors, i.e. Bald Eagles, Golden Eagles, Osprey and Peregrine Falcons documented in the Table Mtn./Arkansas River areas mentioned above. An analysis for potential impacts regarding Species of Special Concern, and for Threatened and/or Endangered Species should be conducted for flight routes, as well as for landing sites. Colorado Parks and Wildlife and the US Fish and Wildlife Service should be consulted in regard to potential wildlife impacts.

VEGETATION AND SOILS: I noticed in viewing the video showing the landing and taking off of helicopters, that soils and plants were being disturbed by prop wash and by the wheels of the helicopters making ruts or impressions into the earth and vegetation. With many repeated landings, soils and vegetation at landing sites will show significant wear and/or elimination. This will lend to erosion and weed invasion. An analysis and discussion of these impacts and mitigation measures for damages should be part of the environmental assessment.

NOISE: The noise information provided is provided in terms of day/night averages typically used for airport impact analysis, versus individual flight/landing events. The decibel levels for flights at various levels, into and out of the sites—as well as landing at the sites, should be shown to reflect actual events versus day/night averages. This is especially important as the decibel levels are logarithmic in progression, i.e. 65 decibels vs. 85 decibels is far greater in noise increases than by counting from 65 to 85 on a hundred count basis. Flights where high, single event decibel levels take place, far beyond the ambient levels in the back country, especially when they are fast moving, will cause “startle response” for all, humans and wildlife.

RECREATION: Most recreationist who frequent the back country, whether to hike, camp, hunt, fish, view wildlife, or seek solitude, will find that the HEMAT activity is a significant problem and impact to the enjoyment of their outdoor experience. This fact should be evaluated for flight corridors/routes, and landing sites, as noise impacts affect other priorities identified in the Royal Gorge Management Plan.

DURATION: The formalized use of public lands for HEMAT activities for a period of 10 years is not in the best interest of traditional users of the public lands. I feel that the proposed use, if approved, should be for a limited period, a year or two, initially, to better allow for evaluation and adaptive management as impacts may suggest. Public input, along with "on ground" evaluations can then be used to determine if longer periods for use are appropriate, and for how and when mitigation of impacts should be put into place.

SUMMARY: HEMAT activities to and from, and at the landing sites will likely cause significant impacts to species such as bighorn sheep, deer, elk and numerous raptor species, over time, and depending on the level of use. Soils and plants will most likely experience significant impacts at landing sites over time. Recreationists/traditional users of BLM lands where HEMAT activities take place, will most likely experience a significant loss of enjoyment of the public lands impacted. With the foregoing in mind, especially where ACECs and WSAs are affected, BLM should consider eliminating or significantly modifying HEMAT activities as proposed. The Table Mtn. area, in association with the Arkansas Canyon Lands ACEC and adjacent to Mc Intyre Wilderness Study Area, are such areas.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bruce Goforth". The signature is written in black ink and is positioned above the printed name.

Bruce Goforth (CDOW Retired)



Coalition for the Upper South Platte

Post Office Box 726
Lake George, Colorado 80827

October 30, 2014

Dear BLM Partners:

This letter is in response to Development Plan the Fort Carson to provide High Altitude Mountain Environmental Training (HAMET) for the Combat Aviation Brigade for use of BLM lands in Park, Teller and Fremont Counties.

The attached GIS data and maps were gathered from these sources: Colorado Parks and Wildlife, Species Activity Data; Colorado Natural Heritage Program's Priority Biodiversity Areas; The Four Mile - Curren Creek Community Wide Fire Protection Plan; and the Army's HAMET, High Altitude Mountain Environment Training Proposed Helicopter Landing Locations.

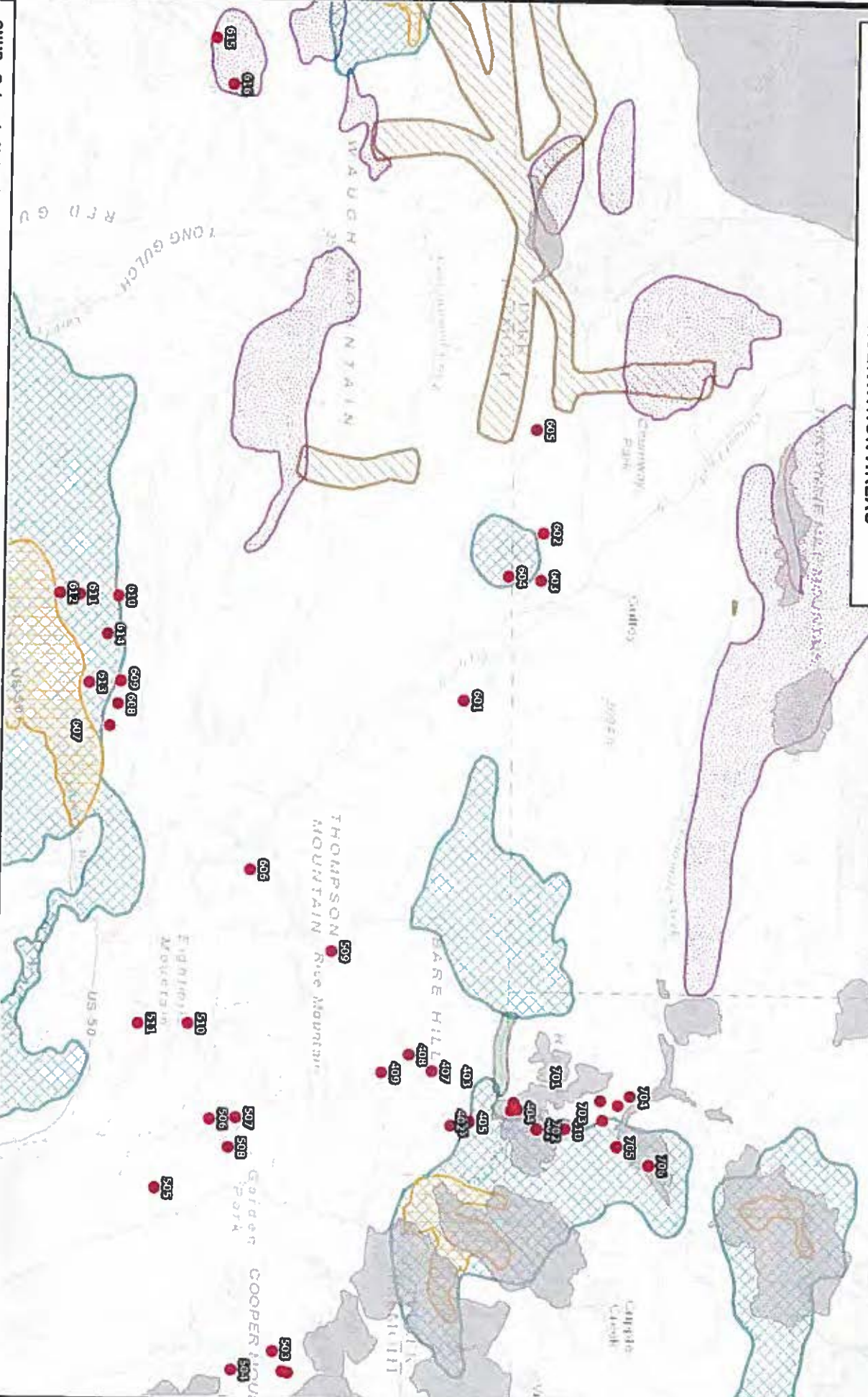
Numerous areas proposed for landing sites correspond to important areas of wildlife and critical biodiversity habitat, and some are in high priority areas for wildfire risk. Based on these issues, we encourage BLM to consider:

- Sites 615 and 616: elk production areas; eliminate training and landing during elk production (calving season).
- Sites 607 - 614: bighorn sheep range, and sites that border sheep production areas; eliminate or strictly reduce training and landing zones.
- Sites 401 - 404 and 703 - 706: potential conservation areas identified by the Colorado Natural Heritage Program; eliminate or strictly reduce training and landing zones.
- Sites 401, 701 - 705: high wildfire risk areas; eliminate training and landing during seasons of drought, specifically during Stage II fire ban rather than Stage III (as indicated in the proposed HAMET plan).
- Sites 401-406 and 702, 705 and 706: multiple layers of considerations; eliminate or strictly reduce training and landing zones.

If these sites of training and landing cannot be avoided, we recommend that the Army work closely with Colorado Parks and Wildlife and Colorado Natural Heritage Program to develop more comprehensive BMP's for these resources at risk.

Carol Ekarius
Executive Director
Coalition for the Upper South Platte
719-748-0033
www.uppERSouthplatte.org

PLANNED FT CARSON HAMET TRAINING LOCATION SITES PRIORITY SPECIES CONSERVATION AREAS



CNHP = Colorado Natural Heritage Program
Priority biodiversity areas defined by CNHP

CNHP Conservation Areas

Species activity data from Colorado Parks & Wildlife

- BIGHORN Migration Corridors
- BIGHORN Production Areas
- BIGHORN Overall Range
- ELK Migration Corridors
- ELK Production Areas

HAMET = High Altitude Mountain Environment Training

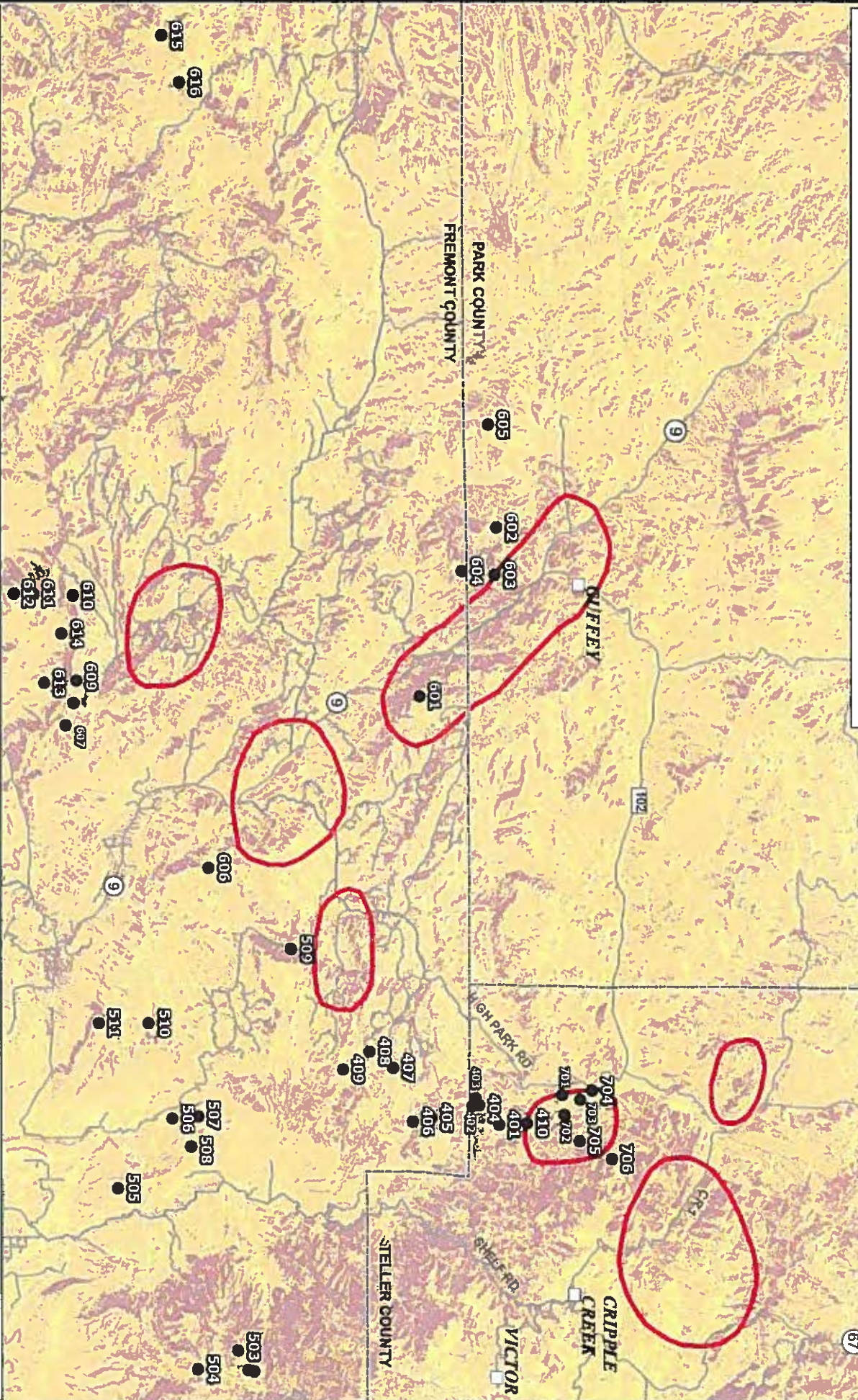
- Proposed Helicopter Landing Locations

From a Forest Goals Summary, Ft. Carson, Colorado, National Park Service, September 1995. Prepared by the Colorado State University, Fort Collins, Colorado. Prepared by the Colorado State University, Fort Collins, Colorado. Prepared by the Colorado State University, Fort Collins, Colorado.

Map Created by the Coalition for the Upper South Plains
Cartographer: C. Acker



**PLANNED FT CARSON HAMET TRAINING LOCATION SITES
WILDFIRE HAZARD RATING FROM FOUR MILE - CURRRANT CREEK CWPP**



WILDFIRE HAZARD

- LOW-MODERATE
- HIGH
- SEVERE

FROM THE FOUR MILE - CURRRANT CREEK CWPP

Wildfire Hazard layer created by combining slope, aspect and vegetation type, which provides a general representation of the areas with the highest risk of destructive fire. The highest hazards consist of locations where the forest is most dense, where slopes are steep and where the aspect is least favorable. The participants worked together to determine the priority fuel mitigation areas using the Wildfire Hazard information.

Towns

HAMET Landing Locations

Priority Fuels Mitigation Areas

HAMET = High Altitude Mountain Environment Training



FEB 12 2015

**COLORADO****Parks and Wildlife**

Department of Natural Resources

SE Region Office
4255 Sinton Road
Colorado Springs, CO 80907
P 719.227.5200 | F 719.227.5297

January 13, 2014

Nancy Keohane
BLM - Royal Gorge Field Office
3028 East Main
Canon City, CO 81212
RE: Comments on HAMET proposal

Dear Nancy,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to comment on the High Altitude Mountain Environment Training (HAMET) project proposed by Fort Carson. Under the scoping for this project, we understand that the BLM is evaluating 43 possible landing zones that were proposed by Fort Carson on BLM lands. These landing zones would be used for helicopter training activity and could have a minimum of 16.25 landings per year per landing zone by the Home Station Training Unit and 1,440 landings per landing zone per year for Non-Tenant Training. Based on our understanding of the proposal, we calculated 62,619 landings per year across all 43 landing zones. While flights are being conducted, helicopters will transition between landing zones at above ground levels (AGL) of 25-200 feet.

Under the current proposal, the flight paths between listed airports and landing zones are not specified. Therefore, we were not able to assess the impacts of transitioning between landing zones on wildlife. However, given that the flights will be conducted at 25-200 AGL, we do expect the transition between landing zones to cause disturbance to wildlife. The remaining comments pertain to the 43 landing zones that were identified in the proposal. CPW staff evaluated these sites for impacts to wildlife, hunting, and our annual big game surveys. Refer to the appendix of this letter to find the definitions for the categories examined.

1) Wildlife Impacts

Low flying helicopters can cause disturbance to a number of wildlife species. The impact of the disturbance varies. During the winter, the disturbance is likely to have the greatest impact on ungulates because they are at a negative energy balance. During the spring and summer, many species have dependent young, which could be disturbed by training activities. Given these concerns,



we evaluated the location of the landing zones and their overlap with mapped winter range and production areas for elk, mule deer, and pronghorn. We also examined the overlap between overall bighorn sheep range and the landing zones. Bighorn sheep have specific habitat requirements and are less able to avoid helicopter activity if it's in immediate proximity.

For Colorado species of concern, we focused our analysis on several raptor species that are known to nest in the general proximity of the proposed project area. During the winter, many raptor species remain in the general area of the nest to maintain their territories. Some of the raptor species begin breeding and nesting activities as early as February. During spring and summer, the raptors have dependent young, which could be disturbed by training activities.

Elk

The following landing zones were mapped within elk winter range: 406, 407, 408, 409, 604, and 607. The following landing zones were mapped within elk winter range and severe winter range: 501, 502, 503, 504, 509, 601, 602, 603, 605, 609 and 610. The following landing zones overlapped mapped elk winter range, severe winter range and winter concentration areas: 601, 602, 603, 605, 609, and 610. Landing zone 608 overlapped with elk winter range and winter concentration area. Landing zones 615 and 616 overlapped with elk winter range and elk production areas.

Deer

Of the 43 landing zones examined all but 615 and 616 are within mapped mule deer winter range. The following landing zones overlapped with deer severe winter range: 401, 402, 403, 404, 405, 406, 410, 505, 506, 507, 509, 510, 511, 602, 603, 605, 606, 613, 614, 701, 702, 703, 704, 705, and 706. The following landing zones overlapped with deer severe winter range and winter concentration areas: 508 and 601.

Pronghorn

The following landing zones overlapped with pronghorn winter range: 602, 605, 701 and 704. Landing zone 506 overlapped with pronghorn winter range and severe winter range.

Bighorn sheep

The following landing zones overlapped with bighorn sheep overall range: 401, 402, 403, 404, 410, 604, 611, 612, 613, 614, 701, 702, 703, 705, and 706.

Raptors

CPW is concerned about impacts of helicopter flights on nesting raptors. Of the 43 proposed landing zones, 8 landing zones have been identified within 1000m of known nests. This is the distance at which air crews may begin flying Contour and NOE. The landing zones identified are 401, 409, 410, 508, 509, 511, 601, and 706. Landing zones 509 and 601 are within 400m of known golden eagle nests and landing zone 511 is within 400m of a peregrine falcon eyrie. Landing zone 508 is within 800m of a known golden eagle nest. In addition to protecting nesting raptors, it is important to focus attention on important foraging areas that support the pair's nesting effort.

In summary, all 43 proposed landing zones had overlap with at least one species' winter range, overall range, production area, or raptor nest location.

2) Hunting

The proposed impact area for this project is located in Colorado big game management units 58, 581, and bighorn sheep game management units S-60 and S-7. These units primarily offer deer, elk, pronghorn, bighorn sheep and turkey hunting opportunities for sportsmen and women. Depending on the species, there are three primary methods of take (archery, muzzleloader, and rifle) available to sportsmen and women in these units and CPW segregates archery, muzzleloader and rifle hunters on the landscape by issuing licenses for separate seasons, which primarily occur in late summer and fall. There are both spring and fall seasons for turkeys. In the affected game management units, our largest number of hunters are in the area during the deer and elk rifle seasons. CPW is concerned that low level flights (low level, contour and Nap-of-the-earth) flights could impact hunters that are pursuing deer and elk, because the helicopters could cause animals to flee.

We acknowledge and appreciate that the Army has stated that they will not land at a landing zone if hunters or other recreationalists are present. It should be noted that rifle and muzzleloader deer, elk, and pronghorn hunters are required to wear blaze orange so they will be easily visible. However, bighorn sheep, turkey and archery hunters are not required to wear blaze orange so they will be much more difficult for helicopter crews to locate. In addition, even if hunters are avoided, we do expect wildlife to flee with low flying helicopters, which could reduce hunter success rates in the proximity of these landing zones.


3) Annual CPW big game surveys and capture

Each winter, CPW personnel conduct low level helicopter flights to gather data on deer and elk productivity/composition and also mule deer helicopter capture operations. These flights are typically conducted in December and January. They are very short in duration. However, they are conducted the same AGL (25-200 feet) as being proposed with this project. We respectfully asked the a condition be placed upon any permit issued by the BLM that the Army be required to coordinate with CPW during December and January annually so we can minimize the risk for collisions between our aircraft.

CPW staff does recognize that there are ways to mitigate impacts to wildlife through the use of timing restrictions and identifying sensitive areas that should be avoided on the flights. However, we believe that the proposed Hamet project would have significant wildlife conflicts and respectfully request cooperator status if this project continues.

Please let us know if you have any questions and thanks again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Prenzl", is written over a horizontal line. The signature is stylized and somewhat illegible.

Dan Prenzl - SE Regional Manager

Appendix: Definitions

ELK WINTER RANGE: That part of the overall range of a species where 90 percent of the individuals are located during the average five winters out of ten from the first heavy snowfall to spring green-up, or during a site specific period of winter as defined for each DAU. Winter range is not delineated for Elk on the Eastern Plains.

ELK WINTER CONCENTRATION AREA: That part of the winter range of a species where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten.

ELK SEVERE WINTER RANGE: That part of the range of a species where 90 percent of the individuals are located when the annual snow pack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten. The winter of 1983-84 is a good example of a severe winter.

MULE DEER WINTER RANGE: That part of the overall range where 90 percent of the individuals are located during the average five winters out of ten from the first heavy snowfall to spring green-up, or during a site specific period of winter as defined for each DAU. Winter range is only delineated for migratory populations. On the Eastern Plains winter range is defined as areas that provide thermal cover for deer. Examples are riparian areas dominated by trees and shrubs, areas of pinyon/juniper, topographic cover such as gullies, draws, canyons, shelter belts and CRP fields that provide adequate cover.

MULE DEER WINTER CONCENTRATION AREA: That part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten.

MULE DEER SEVERE WINTER RANGE: That part of the overall range where 90% of the individuals are located when the annual snow pack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten.

PRONGHORN WINTER RANGE: That part of the overall range where 90 percent of the individuals are located between the first heavy snowfall and spring green-up during the average five winters out of ten OR for a site specific period defined by CPW personnel for that DAU. Winter range is only delineated for migratory populations. On the Eastern Plains winter range is defined as specific areas where pronghorn are known to migrate to on a consistent basis.

PRONGHORN SEVERE WINTER RANGE: That part of the winter range where 90% of the individuals are located when the annual snow pack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten.

BIGHORN SHEEP OVERALL RANGE: The area which encompasses all known seasonal activity areas within the observed range of a bighorn sheep population.

High Altitude Mountain Environment Training (HAMET)

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Name: Coleen Bobinac (resident/land owner/rancher)

Email address: coleen@wildblue.net Garden Park area

Comments:

Increased noise stresses any wildlife in the area and poses a threat for Domestic livestock. I am concerned for my cattle and horses - weight loss (lower market value for cattle) and injuries to my horses - such as their nature to run for flight and running through barbed wire fences + gates. This could lead to major veterinary bills or euthanasia in major injuries.

Potential wildland fire created through any crashes or irresponsible landings.

Increased dust, ^{pollution} potential with every landing and take-off.

Noise pollution interrupts human sleep patterns that lead to increased health problems.

PLEASE - no flights and landings during prime sleeping hours - 10 PM. - 5 A.M. An uninterrupted night of sleep aids in my healing process for ~~my~~ personal diseases!

Jan Currie submitted 10/7/14 in person

I would like to start by reading the BLM's own Mission Statement:


"It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations."

My first question to the members of the BLM is to demonstrate how accepting the Army's proposal (which essentially turn our public lands into army training zones) aligns with your mission statement? If it doesn't then it should not be approved.

However, if that is not enough I offer the following:

The proposed HAMET agreement allows for an estimated 61,920 Non-tenant landings per year, a 2,000% increase in operations when compared to the 2,858 Non-tenant operations in 2012. I would like the BLM to complete a study of the impacts to private citizen usage of BLM land within the 5 MTAs as a result of an approved HAMET proposal. Including but not limited to hunting, fishing, hiking, camping and tourism. Please be sure that the impact study includes loss of revenue to the state for hunting and fishing licenses as well as public loss of revenue for tourism impacts.

Fire as a result of sparks or a crash at an LZ will certainly cause damage to BLM lands. Such a fire could potentially spread to private properties and possibly even result in loss of civilian lives. Alternatively crashes within Fort Carson's 137,000 acres would be contained and would pose significantly less risk to the civilian population. A 2000% increase in LZ activity increases the likelihood of a catastrophe by the same amount. Given the increased training activity, ever increasing human population and recent draught conditions I would like the BLM to complete a study of the impacts of a helicopter crash on or around each of the proposed 43 LZs. These 43 separate studies must include but not be limited to how the vegetation, terrain, wind patterns may propagate the fire toward private land and structures. Secondly, please propose land owner compensation in the event of an LZ initiated fire reaches private property which would have been preventable by simply not allowing landings on BLM lands in the first place.



The use of these public lands for the purpose of military helicopter landings will lead to destruction of BLM lands on and around those LZs. Given that part of the BLM's mission is to sustain health of public lands for future generations I would like the BLM to study the long term effects on wildlife and vegetation after 626,180 landings and takeoffs (includes Tenant and Non-tenant estimated usage over 10 years). How many years/generations will be required to return the LZs to pristine condition? How many generations will be subjected to the impacts of your decision?

Contour, Low level and NOE flights will range from 25-200 feet above ground level within the MTA zone. I would like the BLM to conduct a detailed study of the impacts of the high wind caused by the propeller down draft, noise and heat on our wildlife and our high mountain desert vegetation after prolonged low level operations within the MTAs.

While Landing Zone's may be located within BLM boundaries the MTAs include privately owned property. If BLM approves this proposal they will indirectly be impacting every private citizen owning property within and around those MTA's. I would like the BLM to conduct a study of the financial impacts to private citizens in and around the MTAs which would occur as a result of accepting the Army's proposal.

A 2,000% increase in the Non-Tenant operations would result in an equal increase in noise pollution and air pollution in MTAs and flight paths to and from the MTAs. Helicopter noise levels (per helicopter) reported in the HAMET proposal are approx. 80 decibels at 500 feet slant (equivalent to heavy traffic at 10 meters) and in excess of 90 decibels at 200 feet slant (prolonged exposure at these levels can cause hearing damage). I would like the BLM to study the impacts of the drastically increased noise and air pollution in the MTAs and flight paths to and from the MTAs as a result of accepting the Army's proposal.

And finally I would like the BLM to fully disclose all benefits and incentives that the BLM and/or its officers will obtain as a direct or indirect result of agreeing to the Army's proposal.

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And finally I would like the BLM to fully disclose all benefits and incentives that the BLM and/or its officers will obtain as a direct or indirect result of agreeing to the Army's proposal.

Dec. 18, 2014

To Whom it May Concern,

We have learned in the past few days of a proposed Army training program, HAMET, which would occur in the area of our property near Guffey, Colorado. This training would entail multiple, high altitude, landings and takeoffs, day and night over a period of 10 years.

Currently, we live in East San Diego County, with plans to soon locate to this Guffey, CO location. We now have frequent overflights of large helicopters, day and night, from the Marine Base at Pendleton. Speaking from personal experience, these low flying aircraft literally shake our house and rattle the windows.

The proposed area for this training has many residences scattered though out the region. Most of us keep horses and cattle, and enjoy hunting. All of us enjoy the large wildlife which inhabit the area which is pristine with little human intrusion and noise. BLM is charged with the goal of protecting and maintaining this type of wild area.

This plan would be destructive in multiple ways, and extremely intrusive in the lives of us who live in the region. The large mammals, elk, deer, bear, wildcats, and birds such as golden eagles, would be greatly affected by not only the noise, but also the presence of these aircraft. The landing of helicopters results in disturbed soil from the wheel and skids striking the ground, which would in turn create erosion and disruption of not only the landing site, but riparian habitats downhill from the origination of the erosion. These ecosystems are reliant on clean water in the streams.

We feel that a thorough environmental review, including on the ground site inspections and discussion with local residents, should be done before even considering this proposal.

To proceed, would damage a beautiful, pristine and irreplaceable resource overseen by BLM.

Sincerely,

Dave and Donna Smith
24414 Wildwood Glen Lane
Alpine, CA 91901

cc: Representative Duncan Hunter, Jr.

RECEIVED

OCT 29 2014

MB



(719) 689-2988

www.co.teller.co.us

Fax (719) 686-7900

October 27, 2014

Bureau of Land Management
Royal Gorge Field Office
3028 E. Main
Canon City, CO 81212
ATTN: Mr. Keith Berger, Field Manager

Subject: Fort Carson's Proposed HAMET Plan

Dear Mr. Berger,

The Teller County Board of County Commissioners supports Fort Carson's proposal to conduct High Altitude Mountain Environment Training [HAMET] on Bureau of Land Management [BLM] land in Teller, Park and Fremont Counties on a temporary basis. We recognize the importance of this necessary training for our service men and women, and our nation. Our region serves as a unique training opportunity for military personnel to improve their skills and enhance flight safety for high elevation deployments around the globe. Further, having military helicopter units stationed in our area can be of great assistance in times of fire, flood and blizzards. Please consider Fort Carson's HAMET plan as a benefit to our region, state and country.

Respectfully,
The Teller County Board of County Commissioners

BY: 

Dave Paul, Chairman

cc: File

RECEIVED

DEC 18 2014

HAMET
3028 East Main Street
Canon City, CO 81212

I am writing as a property owner in Hidden Canyon Ranch just north of Lakemoor Drive in Teller County. I have serious concerns with the proposed landing sites and the process being used to assess the environmental impact as outlined by the BLM during one of the townhall meetings. Per the presentation provided by both the BLM Royal Gorge Field Manager and Acting Assistant Manager – it was stated that HAMET operations would avoid landing zones when humans and or livestock and wildlife are present. Tell me, given the six proposed LZ's (701 – 706) along Lakemoor Drive (with their 1000 meter distance encircling the site basically covering all of Lakemoor Drive) – when are humans, livestock and wildlife not present?

It is clear that the sites were selected in absence of the impact to the homes and community of Lakemoor Drive residents as per self admission by the BLM regarding the maps used during site selection. As such, the prudent action to take at this time is to reduce the number of landing sites by withdrawing the 700 series – or selecting alternative sites with far less environmental impact.

We trust you to do the right thing in withdrawing the proposed 700 series sites and/or selecting alternative sites and challenging the true need for 43 total landing sites for the HAMET Program as referenced in the presentation. There are better ways to accomplish HAMET's objectives without having such dramatic impact to local area residents, property, wildlife, livestock and the environment.

Sincerely,

A handwritten signature in blue ink that reads "Diana Santini". The signature is written in a cursive style and is positioned above a horizontal line.

Diana Santini

Hidden Canyon Ranch Property Owner

Dcsantini60@gmail.com

RECEIVED

DEC 22 2014

Don and Leslie Schultz
11222 Delmar
Richland, MI 49083
December 10, 2014

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Field Office, Bureau of Land Management
3028 East Main Street
Canon City, CO 81212

Transmitted via email to: rgfo_comments@blm.gov

Dear Ms. Nancy Keohane:

My husband and I purchased land in Canyon Spring Ranch (CSR) almost 14 years ago in anticipation of our retirement and subsequent move. We visit our property annually, planning where the house will go, hiking the acreage and sitting on "our" rocks. Imagine our distress when we discovered that there could be helicopters flying 500' over our heads day and night, scaring the wildlife, limiting our hiking grounds and polluting our peace and quiet. A major factor involved in our decision to purchase this particular piece of land was the BLM land adjacent to it, lending us an increased bumper from civilization and additional property for exploration.

If we were to decide this is no longer an area we want to inhabit as a result of this military expansion and were to attempt to sell our property, I'm sure there would be few buyers for the land. Not only will our dream be gone but so will all of the money we have invested into our lot at CSR. This money includes the purchase price, annual dues and taxes and the cost of running electricity to our property.

I am writing to encourage you to reconsider the location of the proposed sites for MTA based on the Canyon Springs Ranch development and the surrounding area being a populated area. The installation of a helicopter training site in the near vicinity will put an end to the neighborhood and will render the BLM land inaccessible to hunters, hikers, campers, and other taxpayers. The existence of the helicopter training facility will inhibit the economic growth in the region. The building process would bring a significant amount of revenue to Fremont County. In addition, the increased population would be purchasing groceries, gas, attending school, vacationing, etc. locally.

It seems unlikely to me that vacationers will be interested in visiting the Red River Gorge, camping at the local campsites, biking the wilderness trails, hunting, fishing, and kayaking with helicopters buzzing overhead and with a high DB level frightening wildlife.

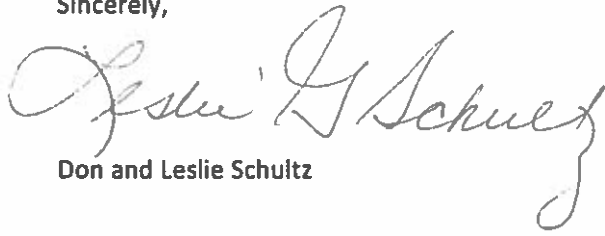
Pending the inability to relocate these facilities, I'm sure you are considering the purchase of all properties in the subdivision at a fair price. While this is not our wish, if plans for the helicopter training area go forth, we will not be interested in living in CSR and would welcome the purchase.

Ms. Nancy Keohane

[Date]

Page 2

Sincerely,

A handwritten signature in cursive script, appearing to read "Don and Leslie Schuitz". The signature is written in black ink and is positioned to the right of the typed name below it.

Don and Leslie Schuitz

DOUG LAMBORN
5TH DISTRICT, COLORADO

COMMITTEE ON ARMED SERVICES

COMMITTEE ON NATURAL RESOURCES

CHAIRMAN,
ENERGY AND MINERAL RESOURCES

COMMITTEE ON VETERANS' AFFAIRS



Congress of the United States
House of Representatives
Washington, DC 20515-0605

2402 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
202-225-4422
FAX 202-226-2638

DISTRICT OFFICE:

1125 KELLY JOHNSON BOULEVARD, SUITE 330
COLORADO SPRINGS, CO 80920
719-520-0055
FAX 719-520-0840

WEBSITE:

Lamborn.house.gov

October 7, 2014

U.S. Department of Interior
Bureau of Land Management

RE: High Altitude Mountain Environment Training NEPA

To Whom It May Concern:

The Constitution of the United States of America clearly establishes "provid[ing] for the common defense" as a top priority for the federal government. Without security, our efforts to pursue happiness are put at great risk. Therefore, our nation's security must be the federal government's first priority. It was in this spirit that I successfully offered an amendment to the FY2015 National Defense Authorization Act when it was considered by the House of Representatives which added section 2817 which states:

"It is the sense of Congress that--

- (1) national defense should be the top priority for all aspects of the Federal Government;*
- and*
- (2) national security functions, such as military training and exercises, should be the top priority, particularly with regard to the use of land owned by the United States."*

This amendment was adopted by a bipartisan unanimous vote, which should make it clear to the Bureau of Land Management and other federal government agencies that national security should be a top priority on public lands.

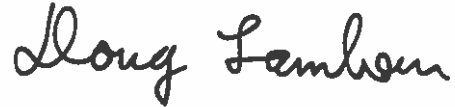
With all this in mind, I strongly support the request by Ft. Carson and the 4th Infantry Division's Combat Aviation Brigade (CAB) to use landing zones for training on public land in Colorado. This training is vital for our military aviators who may be deployed to fly in the mountains of Afghanistan or elsewhere around the world. There is no better location in the United States for America's finest to learn and refine their high-altitude aviation skills. Because of the challenges of operating helicopters at high altitudes, this training can make the difference between coming home safely and not coming home at all for these flight crews and the men and women in uniform they carry around the battlefield.

While this training is vital for our national security and for the safety of the men and women in uniform, it can be done safely and with minimal impact on our region. As spelled out in Ft. Carson's proposal, safety is the first priority for these training efforts. The Army will do everything in its power to ensure that these operations do not put humans, animals or our environment at risk.

Colorado is proud to play an important role in our nation's security and this helicopter training is just one of many ways that we can show our support for the military and ensure that they get the training they need to stay safe while keeping us safe.

I urge you to approve this request and move forward in a timely fashion.

Sincerely,

A handwritten signature in black ink that reads "Doug Lamborn". The signature is written in a cursive, flowing style.

Doug Lamborn
Member of Congress

I am writing to express my Concerns and Opposition as a year around resident, Patriot, and lover of the area under discussion with the Army's HAMET proposal. (FCE Fort Carson Expansion)

"The Bureau of Land Management (BLM) may best be described as a small agency with a big mission: To sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations." --BLM website

I understand why the Army wants this training area, given patriotic fervor at the moment, and I understand why they are asking for so much with so little oversight. But the plan offered will change the character of local BLM lands and go against the statement above, basically destroying a multi-use approach to managing the land. It will also have great impact on properties bordering BLM lands.

Allowing helicopter use of this area 365 days a year will impact wildlife, hunting, hiking etc. too greatly. An alternative would be limiting access to certain weeks a year. Like hunting seasons, these seasons could be arranged with consideration for migrations and mating seasons. No more than 12 weeks a year would seem to be enough.

A permanent right of way does not give the BLM enough control and oversight over lands in their name in future. The Army's plan basically transfers the land into the training areas into an annex of Fort Carson. What are the recourses when terms of the agreement are broken? A lease agreement that states limited uses, has procedures for review, and states renewal periods would be more in line with BLM mission.

The Army's plan does not talk about how complaints will be handled or who will be responsible for responding to them, the BLM or the Army. In 2012 I saw helicopters circling our hoses at very low altitude. In another case, we saw a helicopter flying so close over our house that we were afraid the pilots were having mechanical problems and were about to crash. How will the Army address cases that appear to be pilots playing, not training? I am concerned about the risk of accidents and the wildfires that could result.

This agreement, if approved at this level, would have so many impacts on these areas that it would make the area a one-use zone. This is in conflict with the multi use mission of the BLM, which is supposed to protect "*a wide array of natural, cultural, and historical resources,*" according to agency's website.

Finally, If you haven't watched the reaction of wildlife to helicopters, it is obvious that they don't understand the benefits to military training.

Thanks For Your Consideration of My Concerns
Douglas A Busch



Keohane, Nancy <nkeohane@blm.gov>

Re: HAMET

Berger, Keith <kberger@blm.gov>

Fri, Dec 19, 2014 at 2:22 PM

To: "Bastian, Eleanor" <Eleanor.Bastian@mail.house.gov>

Cc: Jennifer Clanahan <jennifer.clanahan@mail.house.gov>, Kyle Sullivan <ksullivan@blm.gov>, Nancy Keohane <nkeohane@blm.gov>

Thank you for providing the maps, information and the correspondence from Rep. DeGette. I wanted to confirm that I received your information and I'll pass it on to our project lead, Nancy Koehane. As you know, I talked with Jen Clanahan of Rep. DeGette's Denver staff last week and we'll be keeping her up to date as we move through the process. However, please feel free to contact me at any time if you have questions.

Also, feel free to take a look at our website for more information about the proposal, process or current status.

<http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

Again, thanks for your interest in this matter.

On Fri, Dec 19, 2014 at 12:27 PM, Bastian, Eleanor <Eleanor.Bastian@mail.house.gov> wrote:

Thank you for requesting comment. Please see the correspondence from Rep. DeGette attached, as well as maps and a letter referenced in her correspondence.

Best,

Eleanor

Eleanor E. Bastian
Legislative Director
Congresswoman Diana DeGette (CO-01)
2368 Rayburn House Office Building
Washington, D.C. 20515
(202) 225-4431

Keith E. Berger
Field Manager
Royal Gorge Field Office
Bureau of Land Management
3028 E. Main St., Canon City CO.
719-269-8515 kberger@blm.gov

FROM: Frances H. Bosley
825 Pinehurst Court
Louisville, CO 80027

SUBJECT: Concerns about proposed Fort Carson HAMET program

Dear Ms. Keohane-

I am a concerned homeowner of the Lakemoor West subdivision; I believe, within the proposed mountain training area

My home is on Lot 7, Filing 1 at the end of Lakemoor West Drive--perhaps 8400-9000 ft in elevation

Now single, and a handicapped senior, I am unable to read the Ft. Carson maps of the LZs. Hoping to recover more fully, I had wanted to spend time in my peacefully-quiet home and be a more active member of the treasured lifestyle here...

What is the LZ for my property North and South or OVERHEAD? pls answer in the distance of feet. If one LZ is maybe 600 yards from my home, isn't that about 2 FOOTBALL fields away?

What are the negative impacts?? If one of the LZ nearby is at an elevation of 6,268 ft-(remember mine at 8,400-9,000 ft) will there be ANXIETIES about helicopter crashes and forest fires as a result of your training program? What happens to my homeowners insurance policies? NO GUARANTEES, right? especially, since some flight may range from 25-80 ft from "targets". Even a 200 ft flight distance is hardly reassuring!!

WHY SO MANY LANDINGS?? I accept the mathematical research that approximates 20,000!!! take-offs and landing events in my area. will be right in in a BATTLE ZONE!! Even late afternoon/evening drills--there goes my evening news and restful sleep!

IMAGINE awakening with lights on all over, DEAFENING scary noise to find yourself in a BIZARRE war scene right in your front yard!! with yourself as a Major character!

So how do I have quiet enjoyment of my wonderful star-filled skies and Heavens!!

SO please rescue my valley from the NIGHTMARE you are making in our daily lives!

DO THE RIGHT THING!!!

ACCEPT that Fort Carson and its immense acreage and other requirements is the ONLY PLACE for HAMAT mountain training.

You appear to stretch the Army's credibility and integrity with the vagaries in your presentation.

Thank you for your reconsideration of this proposal.

Frances Bosley
fhbosley@gmail.com



Fremont County Board of Commissioners

615 Macon Ave., Room 105 - Cañon City, Colorado 81212

Phone (719) 276-7300 - Fax (719) 276-7412

Tim Payne
District 1

Debbie Bell
District 2

Ed H. Norden
District 3

December 11, 2014

Nancy Keohane NEPA Specialist
Royal Gorge Office, Bureau of Land Management
3028 East Main Street Cañon City, CO 81212

RE: Fort Carson HAMET proposal on BLM Public Lands

Ms. Keohane:

The Fremont County Board of Commissioners appreciates the efforts by the Bureau of Land Management last October to involve us in the public scoping on the HAMET proposal permit high altitude helicopter training by the US Army at Fort Carson. We had received little public feedback until recently when word apparently began reaching more people. This was one of our principal concerns that we raised in our conversation on October 20th with RG Field Office Manager Keith Berger and CWO Kimber of Fort Carson.

We appreciate the fact that the BLM extended the initial public comment period. In the interim, Fremont County tried to circulate information about the proposal on our own web site and note the efforts the BLM made to reach out to the news media as well as on your own web site. For whatever reason it appears there was little public penetration of the proposal throughout southern Colorado media. We encourage you to consider another 60 day extension for public comment because it seems the word is just now circulating in Fremont County as well as in Teller County. We are willing to assist however we can in spreading the word.

We would also like to restate our concerns we voiced earlier regarding the potential impacts any of these low level approaches to targeted helicopter landing sites on BLM lands would have on neighboring private properties. We urge that in the BLM's environmental review you take into consideration the impacts low flying helicopter approaches would have on private property owners, cattle, other livestock, and wildlife.

We also expressed concern about the potential impacts on cattle grazing on public lands as part of BLM grazing leases and were assured that would be taken into consideration.

We recognize that the HAMET proposal involves Fort Carson looking for a more permanent use of public lands for helicopter training instead of obtaining year to year permission. If the long term HAMET plan mirrors what has occurred previously on an annual basis, we'd like to believe that no new impacts would be created beyond what Fremont County residents have experienced in the past. If the proposed plan expands the number of landing sites and number of flights then the Board certainly encourages a close examination of that expansion and the total, broader impact that might occur.

The Fremont County Board of Commissioners recognizes the unique, strategic value that BLM public lands in our county has for the training of the Army's helicopter pilots. We're proud to know that Fremont County can be such an integral part of this training. It's simply our hope that the BLM properly explores all of the potential impacts upon public and private lands through the course of this process.

Respectfully,



Tim Payne, Chairman
Commissioner Dist. 1



Debbie Bell
Commissioner Dist. 2



Ed H. Norden
Commissioner Dist. 3

**STONE RANCH**

Howard and Barb Stone
8292 CR 1
Florissant, CO 80816
(719) 689-2277
hvbarranch1@aol.com

RGFO

Nancy Keohane, BLM
rgfocomments@blm.gov

RE: Fort Carson/BLM Contract
HAMET

We are one of several working ranches in Teller County located along the 4-Mile corridor. We are a cow-calf operation and raise hay on our native grass meadows.

We are very concerned about Fort Carson's proposal to increase their HAMET operations in Teller, Fremont, and Park Counties. The casual use of the BLM for MTAs and LZs has been intrusive and objectionable to the residents of the 4-Mile area, and particularly to Lakemoor West and Guffey residents. The proposal to increase the intensity of the military training is frightening. The sound of helicopters flying low and landing many times during the day and night is disturbing to we who reside here, and the negative impacts to the area would be enormous.

Beginning with the acquisition of ranch land on upper 4-Mile Creek by the Nature Conservancy in the early 1970s that eventually became part of Mueller State Park, the 4-Mile area has been essential to the preservation of land, wildlife, agriculture and the intrinsic values that are inherent with the protection of these resources; scenic vistas, open meadows, grazing animals, wildlife viewing.

In the 1990s a local residents group, the 4-Mile Regional Planning Committee, further recognized the need to preserve and protect the 4-Mile area's rural lifestyle and developed and submitted a plan to Teller County to stop commercial development, high density mobile home parks, apartments, duplexes, PUD's, etc.

Palmer Land Trust also promoted land preservation in the Pikes Peak and 4-Mile Creek areas designating them as high priority to protect from development. Conservation plans and goals were identified and conservation easements were implemented beginning with our ranch. Many organizations and trusts such as GOCO (Great Colorado Outdoors), The Colorado Conservation Fund, Rocky Mountain Elk Foundation , Colorado Cattlemen's Agricultural Land Trust, Land Trust of the Upper Arkansas donated monies to help fund these easements. There are now approximately twelve conservation easements on ranches and larger pieces of property in the 4-Mile Creek corridor, protected in perpetuity for all to enjoy. Most of the easements are livestock operations.

Many low flying aircraft will move wildlife, unsettle cattle, frighten horses, disrupt flight patterns of eagles, herons, geese and migratory birds that use the wetlands of 4-Mile Creek. The loss of wildness, serenity, solitude, and property values will be real.

The image of busy skies filled with huge military helicopters and planes flying and landing over lands conserved and protected by land owners and over residents' homes is grievous. The Gold Belt Scenic Byway running through much of Teller and Fremont Counties will be negatively impacted as well. An airport is incongruent over land preserved and over an area protected for rural living.

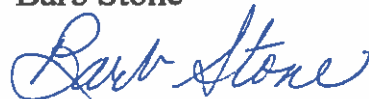
We honor our armed forces. They protect us everyday. We want our soldiers to have the best training in the world. We believe there is a better, more isolated piece of ground on BLM that would serve the purpose they are looking for.

In closing, we respectfully request that you suggest an alternative area for the HAMET and reject the proposal from Fort Carson.

Sincerely,

Howard Stone

Barb Stone



DEC 17 2014

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environmental Training (HAMET) since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office Office at: <http://blm.gov/23ld>

This scoping period will run from Nov. 19 to Dec. 19, 2014. Comments concerning the proposed action, alternatives and identification of issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments: HAMET Helicopter Training for Pilots is necessary and essential. Most everyone will state that they support the military however, their training should not be in my backyard (NIMBY). Since Ft. Carson is the only Army Post in a mountain area, where else is it possible to obtain HAMET training? I support the Army's efforts to insure pilots are properly trained. I would hope, that where possible, high concentration of landing zones in areas where there are many homes (Lakemoor West Ranch - LZ 701 thru 706) could be moved to a less populated area - Regardless, whenever it maybe, Ft Carson should be granted the use of public lands to train helicopter pilots in a mountain environment.

James L. McElveen
79 Ranch View Drive
Florissant, CO. 80816
(Lakemoor West Ranch)
(719) 689-5762

DEC 17 2014

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environmental Training (HAMET) since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

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Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

I concur with all that my husband, James L. McElveen wrote to you. We are not against HAMET, and there are others here in Lakemoor West who do not agree with the activists who are against it -- the NIMBYS (NOT IN MY BACKYARD). Yet, they all say they support the military! How? Justly, service, because when it is time to show support -- they won't. They are so proud of their protesting when they should all be ashamed of calling themselves American citizens. Many are half-heartedly protesting but are aroused when alerted by the dire exaggerations of the few. We were approached & encouraged to attend the meeting inripple creek because the activists (activists wanted a show of force, "as many as we can get" to go. They thought we were sheep & would blindly follow their lead. They learned at the meeting that we had our own thoughts & did not agree. They are concerned about the loss of property or a fire that could result if a helicopter crashed but I have yet to hear anyone lament the possible size of the pilot who could die in said crash. If they don't want American helicopters flying overhead maybe they will welcome one from the Chinese or Russians. Thank you for listening to us. Aggie McELVEEN
79 Raven View Drive
Florissant, CO, 80816
LAKEMOOR West
719-689-5762

OCT 15 1014

October 9, 2014

PO Box 164
Howard, CO 81233

Dear Nancy,

Thanks again for your phone time, and for the mailing regarding the proposed Plan of Development from the Army.

I am enclosing from today's Mountain Mail newspaper a Letter to the Editor that addresses some of the concerns I expressed to you, and says it even better.

The Mt. Mail reported, as I mentioned to you, that though the BLM had told people only to ask questions, but not to comment at Tuesday's meeting, some folks chose to comment during the meeting anyway. Frankly, unless it was announced earlier, I suspect most people were surprised and dismayed at the request.

On the phone you stated that it's very costly to bring in an official recorder to transcribe public comments, and that this practice has been instituted nation wide. I doubt that most people care as much whether their input is recorded as that they have been heard by both BLM officials present at the meeting AS WELL AS OTHER CITIZENS. Therefore, I suggest verbal comments, (frustrations, etc.) be promoted in the future, rather than discouraged.

With the current suppression of voter rights in many of our United States, citizens' voices are losing power granted to us by the Constitution, and as we watch other rights being taken away, being deprived of voicing our concerns at BLM meetings that should, and were in the past, formatted as "town meetings" is not appreciated. Additionally, many people do not like to write letters, and may not bother since they feel they were not listened to at public meeting, so probably wouldn't be if they wrote a letter. In other words, this practice by BLM gives the appearance of silencing citizens, while making a pretense of listening by holding "public meetings" (required by law, I believe) resulting in an adversarial us-vs.-them atmosphere. Our homes have become more and more the 6HLY place we have for privacy, and turning our living areas into simulated war zones is becoming a creeping disaster. Many come to Colorado to raise children in nature and peace, not to raise them in war-zones.

Sincerely, Judith E. Hicks

OCT 14 2014

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environment Training since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

This scoping period will run from Oct. 1 to Nov. 1, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. To submit a comment, please contact Melissa Garcia at 719-269-8724 or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts at <http://blm.gov/3zld>.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

In the Q/A at the Abbey event center in Canon City on 10-7-14, the speaker from the army stated that the Forest Service wanted the helicopters to find other places to land, instead of just around Colorado Springs, because of the impact on the land.

What were the impacts? Could we see pictures? How many landings were there at each site?

Gene Chess carehome@earthlink.net

November 25, 2014

Nancy Keohane, NEPA Specialist, BLM

SUBJ: BLM Evaluation of Fort Carson HAMET Program; Comments on

Dear Nancy,

1. INTRODUCTION: I served 32 years either in the Navy or working for the Navy. While serving and tagging along behind various 4-star Admirals, I have flown on and off ships, both large and small, by helicopter while bobbing at sea. I have landed by helicopter at the Pentagon. I fully understand the critical need for the HAMET helicopter training program. However, I strongly believe that HAMET Mountain Training Area (MTA) 7 and probably Landing Zone 410 of MTA 4 are a serious mistake and should be eliminated from the program for the following reasons:

2. HAMET AND THE SUBDIVISION: The Lakemoor West Subdivision includes more than 70 properties and over 40 homes. This subdivision, which is zoned as residential by Teller County, is contained within and surrounded by proposed Mountain Training Area 7 and Landing Zone 410 immediately to the south. All but a handful of properties in the subdivision are within 1000 meters of one or more of landing zones 701, 702, 703, 704, 705, and 410. This is important because low altitude "contour" and "Nap-of-the-Earth" helicopter training will be conducted within a 1000 meter radius around the landing zones per the proposed plan. This means that we can expect helicopters to be operating at very low altitudes and in very close proximity to the multitude of homes throughout the subdivision.

If we take the 1000 meter circles around every HAMET landing zone and determine the number of houses inside each circle, we get the following results:

For the 37 landing zones not impacting Lakemoor West and neighboring subdivisions, we find only **3 houses** within all of the 1000 meter circles for this large collection of landing zones contained in MTA 4, MTA 5, MTA 6E, MTA 6W, and MTA 7.

For the remaining **6 landing zones** (listed below) which are adjacent to Lakemoor West Subdivision, we get the following results for the number of houses inside the 1000 meter circles for landing zones 701-705 and 410 when considered individually:

701	3 houses
702	13 houses
703	9 houses
704	15 houses
705	14 houses
410	4 houses

A few houses are double or triple counted because they are inside 2 or 3 of the 1000 meter circles ... an especially bad situation for those houses. One of our fears is that home owners in close proximity to landing zones may lose their home insurance and possibly their

mortgage and then their homes. While the above analysis says that landing zones 701-705 and 410 are very objectionable, it also points out that the other 37 landing zones are reasonable from a "distance from public" standpoint.

3. **HAMET AND THE FAA:** Aircraft are required to maintain a "minimum safe altitude" of 500 feet while flying over "populated" areas. The FAA allows helicopters to go below 500 feet if they can do so safely. However, logic would dictate that pilots **in training** flying under **unfamiliar high altitude conditions** and at **more dangerous low altitudes** may not be able to do so with an acceptable level of safety when operating for **extended periods over residential subdivisions**. HAMET is being implemented because of the large number of high altitude "mishaps" that have occurred while crews were deployed. If their pilots are going to have high altitude mishaps, the Army clearly wants those mishaps to occur here rather than in Afghanistan. As a result, if mishaps or mechanical problems occur within Mountain Training Area 7, there is a good chance that some of the helicopters will end up in the Lakemoor West Subdivision.

4. **NUMBER OF FLIGHTS:** The HAMET Program Document anticipates "up to" around 1460 combined "tenant" and "non-tenant" flights per landing zone per year. The document also notes that a typical flight includes a landing, 30 minutes on the ground, and a take off. As a result, the neighbors near a landing zone will experience two separate "noise events" per flight. Therefore, the Lakemoor West Subdivision, in very close proximity to six landing zones, can expect up to 17,000 take-off or landing events per year, or around 50 each day or night. Each such event will often be accompanied by an additional low level transit of the subdivision.

5. **NOISE LEVELS AND REQUIREMENTS:** The HAMET Program Document states that an AH-64 helicopter at a distance of 200 feet produces a noise level of 92 dB. Noise levels increase 6 dB each time the distance is cut in half. Therefore, at 100 feet the level would be 98 dB, at 50 feet the level would be 104 dB, and at 25 feet the level would be 110 dB. A noise level of 105 dB can cause some hearing loss after less than one minute of accumulated exposure. Also, the daily "average" noise limit for residential areas is 65 dB when stated in terms of A-weighted day-night average sound level (ADNL). The Fort Carson Noise Study for the Base points out that a single flyover by an AH-64 helicopter at 100 feet produces an ADNL of only 51 dB for the day. However, 8 flights at 100 feet during a day produces an ADNL of 60 dB. Because noise levels at night are more objectionable, the ADNL calculation adds an additional 10 dB penalty. Flights below 100 feet would further increase the ADNL level. It is fairly clear that the 65 dB residential limit could easily be exceeded in the Lakemoor West Subdivision.

6. **FIRE, BIODIVERSITY, RECREATION:** According to studies by The Coalition of the Upper South Platte (CUSP), Lakemoor West is in a wildfire "priority fuel mitigation area." This means that any fires that occur within or adjacent to the subdivision are likely to be hard to control. As a recent volunteer fire fighter with the local 4-Mile Fire Department, I can confirm that fighting fires in this area is not fun. CUSP has also determined that Lakemoor West is in or near priority biodiversity areas as identified by the Colorado Natural Heritage Program. In addition, being in a populated area of the County, the BLM parcels containing Landing Zones 701, 702, and 703 are often used for hiking, horseback riding, camping, partying, target shooting, and hunting. This area is essentially our neighborhood park. The

HAMET Program document states that Fort Carson prefers to avoid "sensitive plant and wildlife habitat, high-use recreational areas, and other sensitive or protected resources." If this is true, how did they pick Mountain Training Area 7?

7. LEGAL AND OTHER ISSUES: The BLM has the legal authority and the responsibility to manage the lands under its control for the good of the public and the Country in general. With respect to the HAMET helicopter training program, the Army has requested several things from the BLM:

a. The Army has requested the BLM to allow them establish 43 helicopter landing zones on BLM lands to be used by the Army for high altitude training of military helicopter pilots.

b. The Army has requested the BLM to allow military helicopters to fly between groups of landing zones at altitudes as low as 200 feet, often over non-BLM land. The Army really does not need BLM approval to do this. On the other hand, the BLM has the right to tell the Army they cannot establish landing zones on BLM property, so the BLM has the power to influence Army behavior in matters such as flight altitudes in, around, to, and from these BLM lands.

c. The Army has requested the BLM to allow military helicopters, piloted by trainees, to fly at very low altitudes when within 1000 meters of any of the landing zones. While I understand that these flights are necessary, such helicopter maneuvers, even by experienced and fully qualified pilots, are widely recognized as presenting increased risk to the crew as well as any people or property on the ground.

Mountain Training Areas: The BLM has the authority to grant permission for the Army to use "BLM lands" in the manner outlined above. However, the Army has also proposed the establishment of Mountain Training Areas which would enclose very large areas and contain groups of landing zones. The currently proposed Mountain Training Areas include and impact not only BLM lands, but also private lands and lands owned and administered by the State of Colorado and the Forest Service. The "share" of BLM administered lands within the various proposed Mountain Training Areas ranges from around 30% up to around 70%. The remainder belongs to somebody else. The BLM is limited in what it can "authorize" with respect to Mountain Training Areas outside of BLM boundaries unless the BLM is imposing "limits" on Army activities on those non-BLM lands in exchange for giving the Army the right to use BLM property for landing zones.

The BLM will need to take steps to protect the public in and around landing zones from multiple daily helicopter landings and unpredictable low altitude helicopter approaches and departures in all directions from each landing zone. Per the current Army proposal, helicopters may approach and depart landing zones while flying very near ground level, day or night, within 1000 meters (0.62 miles) of a landing zone. It would appear that, for liability reasons, the BLM will have no choice but to make these large areas (1.24 mile circles around the each landing zone) off limits to the public most or all of the time if there is even a small likelihood the public or grazing animals may be present. I personally believe the only way to safely do this would be to enclose the area within a security fence unless the landing zones are in very remote locations. Otherwise, BLM will effectively be allowing

the public to "go out and play on the runway."

A large number of currently proposed landing zones are at or near the perimeter of a BLM parcel. As such, BLM approval of any landing zone within 1000 meters of a parcel boundary would in effect have a direct and significant impact on the safety, hearing, and health of adjacent property owners within the 1000 meter radius but on non-BLM land, unless the Army is required to keep all extremely low elevation training flights entirely over BLM lands where the BLM can take steps to ensure the health (hearing) and safety of the public.

If the BLM desires to be a good neighbor with the property owners living or working on lands adjacent to BLM properties that are impacted by HAMET, the BLM should use its approval authority to require the HAMET helicopters to stay above 500 feet unless they are over BLM property. FAA rules would allow helicopter flights at lower altitudes, but BLM has the necessary influence to provide some relief to the surrounding public in exchange for granting the Army permission to use BLM property for landing zones. There is plenty of BLM property to give the Army room to practice low level flying below 500 feet. The BLM should retain the right to withdraw approval of BLM landing zones if the Army should ignore agreed upon flight altitude limits.

Based on the above, it would make a lot more sense to establish Mountain Training Areas that are confined to BLM property. The Army would be required to approach and depart MTA's at 500 feet or above. Flights down to 200 feet would be allowed within the MTA over BLM property, and flights down to zero feet would be allowed within 1000 meters of landing zones which would be located at least 1000 meters from all BLM property lines. If necessary, the BLM should allow the Army, at their own expense, to clear small areas large enough for additional landing zones if not enough "natural" landing zones can be found in acceptable areas.

BLM should also consider authorizing the Army to build a minimal "restricted" road system, at Army expense, to reach remote landing zones deep in BLM property and well away from most recreational users and grazing cattle.

BLM should permit the Army to establish a small heliport and refueling facility at a single safe location in the center of the overall training area near a major road such as Highway 9 from Canon City. This will minimize the need for flights between Fort Carson and the training areas while also increasing the amount of flight time for training. This will allow a corresponding reduction in the number of landing zones needed.

Kenneth C. Jones



Pleased Confirm

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 3:22 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Please confirm that you received my emails sent today titled:

HAMET - I'll try again
HAMET - Simplified
HAMET - Counting of Houses
HAMET and Housing Density
HAMET - Mountain Training Areas

If necessary, I can easily retransmit.

Thanks,

KC Jones

Mail

COMPOSE

HAMET KMZ Files for Your Use

Inbox x

- Inbox (12)
- Starred
- Important
- Sent Mail
- Drafts (1)
- Trash
- All Documents
- Destiny Draft Comme...
- Guffy Gorge
- HAMET
- Inbox/Bald Hill
- Inbox/Destiny Mining ...
- Inbox/Feb2013_O&...**
- Inbox/Geothermal
- Inbox/Minerals
- Inbox/Mountain State...
- Inbox/New Elk Coal L...
- Inbox/Nov 2012 Oand...
- Inbox/Oil & Gas
- Inbox/Over The River
- Inbox/Quarry
- Inbox/Shelf Road Cm...
- Inbox/Veg Treatment ...
- More

KC Jones

3:42 PM (43 minutes ago)

To Nancy

I don't promise I found every house, especially in areas outside the 1000 meter rings.

MTA boundaries and corners were determined using the Army Planning Document low resolution Topo map figure.

If these files don't work, let me know and I will try again.

3 Attachments

 LZ RINGS.kmz

 HAMET MTA.kmz



Fwd: HAMET and Housing Density

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 12:58 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

I have tried to find all the houses in each of the proposed Mountain Training Areas. I have also added the 1000 meter circles around each Landing Zone. These are the areas that will be impacted the most by the helicopters. Look for houses that are in one or more red circles as you look at these pictures.

Counting all of these houses in all the large Mountain Training Areas was not easy and I'm sure I missed a few, or maybe I counted a barn as a house. However, concerning the red circles, I searched the circles several times trying to be sure I had not missed any houses. Also, in Mountain Training Area 4, there are many, many small white objects which may be small trailers. I didn't count all of them because I could not confirm that they were a likely home for somebody (e.g., no driveway, no cars, no propane tank, etc.) A few of them may be some kind of residence.

If you try to count houses yourself using these images, you may think you have found a small discrepancy. What happens is that if you go to Google Earth and zoom in really close, some of the house icons (the yellow house shapes) move a little bit and the actual house may be inside the circle while the icon appears to be just outside the circle. I counted by zooming in on each house and determining on which side of the red circle it was located.

The first 5 pictures are Google Earth views from an altitude of 30 miles.

All the pictures are made the same way in this set so that the apparent

housing densities are comparable. The order of the pictures is MTA 6W, MTA 6E, MTA 5, MTA 4, and finally MTA 7.

MTA 7 is so congested that it is hard to see how bad things are, so the last picture

is MTA 7 again but zoomed in to 10 miles. This spreads things out so you can see better.

In this picture it is important to realize that half of the houses in and around Lakemoor West subdivision are inside a red circle, in some cases some houses are inside 2 or 3 red circles.

Now go back and look at all the other MTA's and note how many houses are inside a red circle.

KC Jones

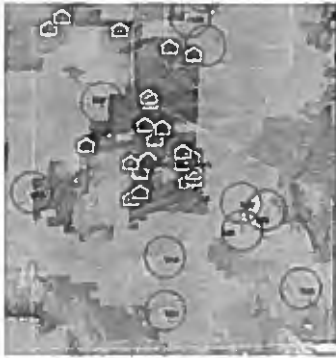
6 attachments



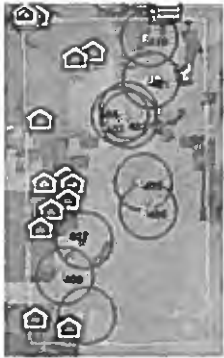
30 MILE VIEW OF 6W .jpg
183K



30 MILE VIEW OF 6E .jpg
174K



30 MILE VIEW OF 5 .jpg
122K



30 MILE VIEW OF 4 .jpg
53K



30 MILE VIEW OF 7 .jpg
44K



10 MILE VIEW OF 7 .jpg
200K



HAMET - Counting of Houses

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 12:59 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Here is my raw tally of houses inside the circles around each landing zone. Note that the four houses near landing zone 4 in MTA 4 are all houses in Lakemoor West Subdivision. The important point about the circles is that the Army plan would allow their helicopters to fly as low as they want inside these circles.

KC Jones

=====

MTA 4	LZ	Number of Houses
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	2
	9	0

10 4 LAKEMOOR
 HOUSES

		Number of Houses
MTA 5	LZ	
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	0
	9	0
	10	0
	11	0

		Number of Houses
MTA 6E	LZ	
	1	0
	2	0
	3	0
	4	0
	6	0
	7	0
	8	0
	9	0

10	0
11	0
12	0
13	0
14	0

		Number of Houses
MTA 6W	LZ	
	605	0
	615	0
	616	1

		Number of Houses
MTA 7	LZ	
	1	3
	2	13
	3	9
	4	15
	5	14
	6	0



HAMET - Simplified

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 1:07 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Nancy,

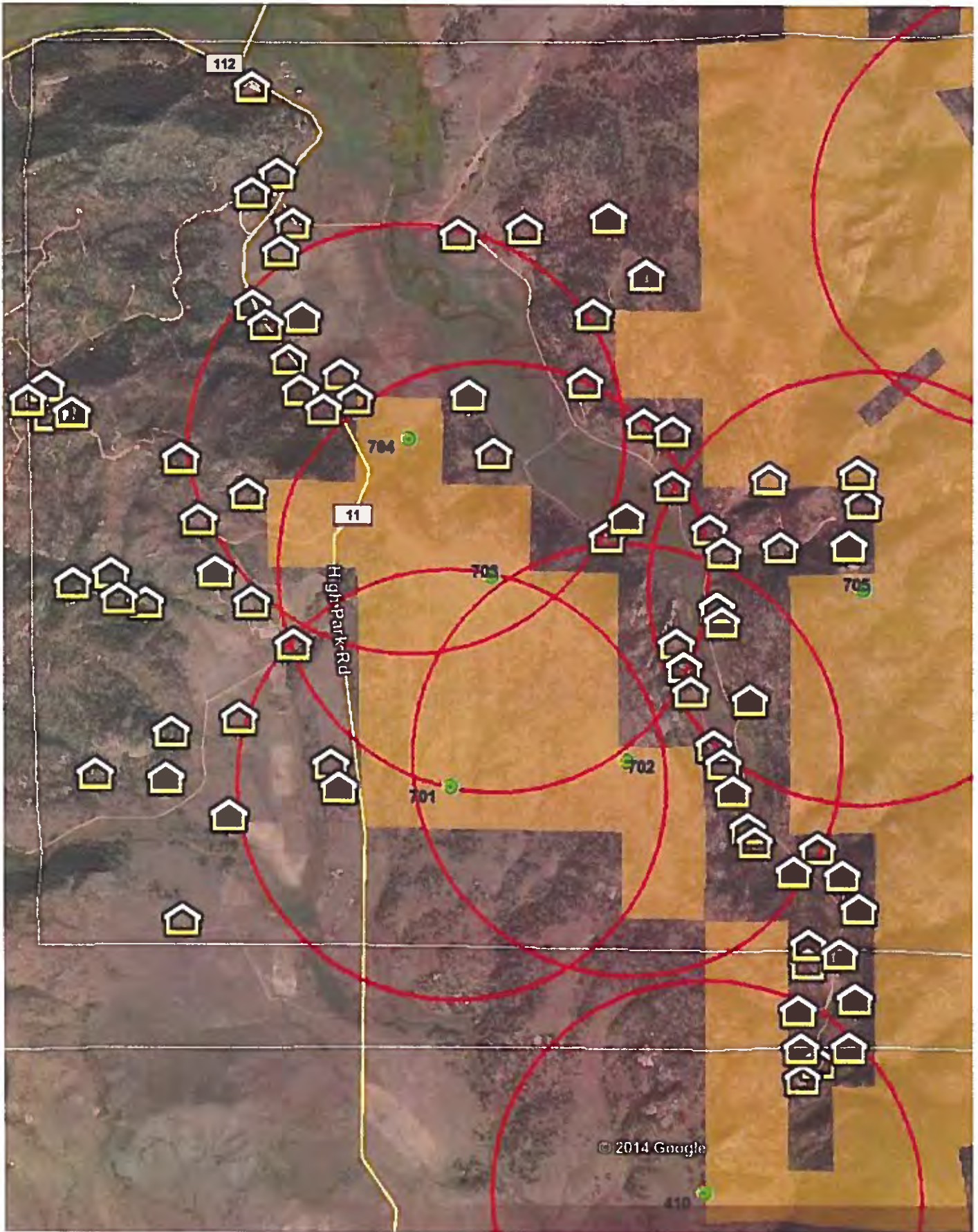
Attached please find my simplified HAMET Plan.

As I read the Army planning document, I get the feeling I am being overwhelmed with irrelevant details ... probably to make it hard to figure out what is really going on.

After a lot of studying, I think HAMET should be revamped using the attached very short document as a starting point. I think it would solve most of your problems while supporting the Army and hurting your neighbors as little as possible.

KC Jones

 **SIMPLIFIED HAMET PLAN.pdf**
20K

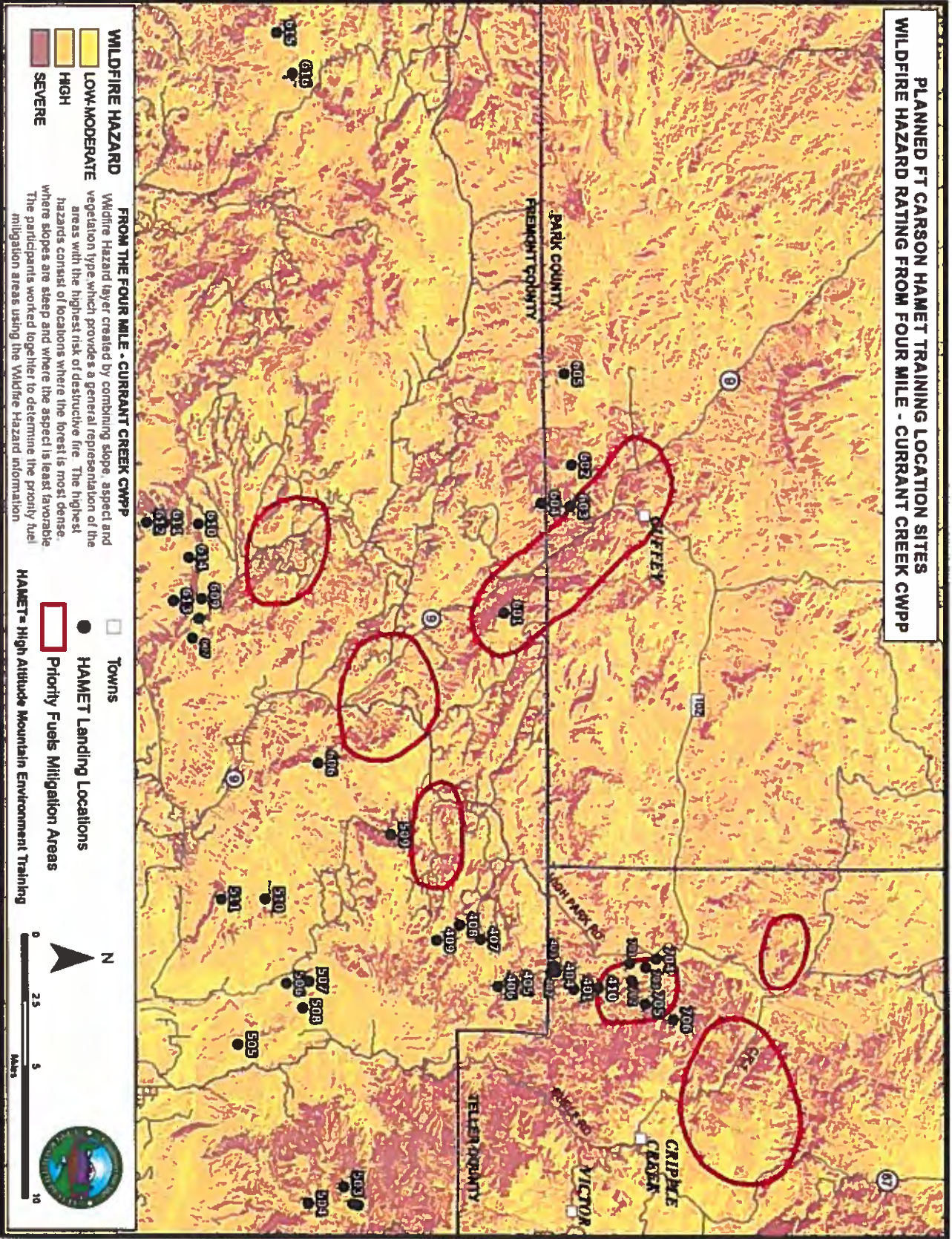


RED ZONE HOUSES

Houses in the Red Zone 1000 meter circles of Six LZ's (410 and 701 thru 705) = 46

Total Number of Houses in Red Zones 1000 meter circles for All 37 Other LZ's = 3

**PLANNED FT CARSON HAMLET TRAINING LOCATION SITES
WILDFIRE HAZARD RATING FROM FOUR MILE - CURRANT CREEK CWPP**



- WILDFIRE HAZARD LOW-MODERATE
- HIGH
- SEVERE

FROM THE FOUR MILE - CURRANT CREEK CWPP
Wildfire Hazard layer created by combining slope, aspect and vegetation type which provides a general representation of the areas with the highest risk of destructive fire. The highest hazards consist of locations where the forest is most dense, where slopes are steep and where the aspect is least favorable. The participants worked together to determine the priority fuel mitigation areas using the Wildfire Hazard information.

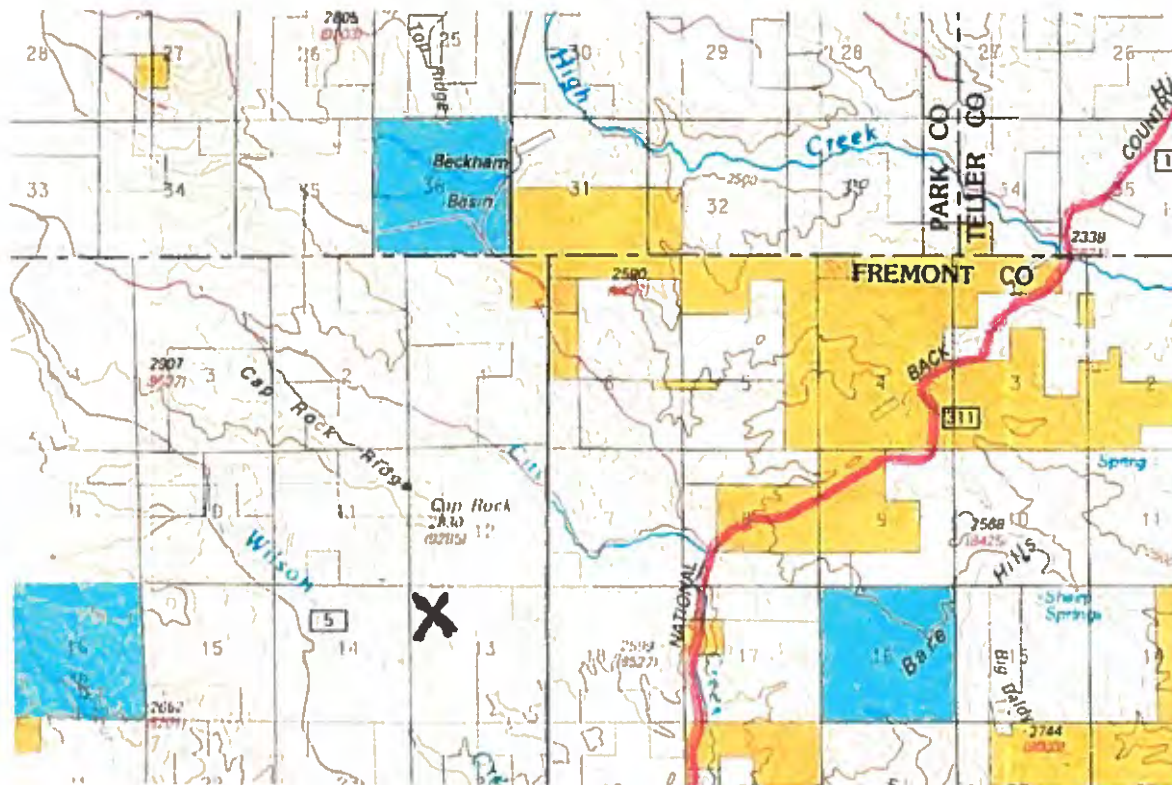
- Towns
 - HAMLET Landing Locations
 - Priority Fuels Mitigation Areas
- HAMLET = High Altitude Mountain Environment Training



OCT 14 2014

Comments on Fort Carson's Proposal to use Public Lands for High Altitude Mountain Environment Training.

We have lived just south of Cap Rock in north central Fremont County (see map) since 2005. We support Fort Carson's current proposal to use public lands for High Altitude Mountain Environment Training (HAMAT). We noticed no adverse impacts to our cattle or horses during previous HAMAT operations. We did not witness any adverse impacts to wildlife during those operations. The only impact we personally experienced was occasional noise from overflying helicopters. We did not find the noise or the helicopters in our area to be objectionable and we are proud to support our soldiers in their training efforts.



Ray Fallen and Rhonda Denney
1250 Achy Back Lane
Canon City, CO 81212

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office area for High Altitude Mountain Environment Training since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

The scoping period will run from Oct. 1 to Nov. 1, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. To submit a comment, please contact Melissa Garcia at 719-269-8724 or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts at <http://blm.gov/3zid>.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

JOINTLY SUBMITTED COMMENTS

October 31, 2014

FROM: The Colorado Springs Regional Business Alliance (RBA), Military Affairs Council (MAC) and the Pikes Peak Chapter of the Association of the United States Army (PPC-AUSA), both non-profit community support organizations.

TO: The Bureau of Land Management Royal Gorge Field Office

REFERENCE: Fort Carson's request for longer term use of public lands for High Altitude Mountain Environment Training (HAMET) than from 2010 to present.

The MAC and PPC-AUSA support Fort Carson's request for the following critical reasons:

- The U.S. Army's worldwide deployability combat readiness imperative, which is a national security requirement, includes the need for this vital aviation HAMET training.
- No other location in the country offers the mountainous terrain at high enough altitudes to train helicopter pilots in ***safe and proper*** HAMET flying and landing techniques and procedures, *while also providing the necessary cost effective proximity to a training base (Fort Carson Butts Army Airfield) with appropriate aviation operational and logistic support.*

High Altitude Mountain Environment Training (HAMET)

- Because Fort Carson's Plan of Development (POD) offers a feasible, practical, cost effective solution to our Army's ongoing need for aviation HAMET training, Fort Carson's importance to our national security and presence in our region is strengthened considerably.
- Department of Defense (DOD) and Department of the Army (DA) sequestration and annual budget reduction mandates, as well as the possibility of a Base Realignment and Closure (BRAC) action as early as 2017, threaten Fort Carson (and other military) downsizing in our region, which if ordered could result in a sizably negative economic impact to our state and local communities.
- The more vital Fort Carson's link is to national security requirements, the less likely the post will be significantly downsized; in fact, it could very well become an attractive realignment stationing base for other displaced DOD and DA organizations affected by budget cuts and a BRAC.
- The MAC and AUSA strongly believe that Army and Fort Carson leadership will appropriately and effectively address any and all natural and human environmental concerns submitted to BLM as a result of this process.
- If called upon, we stand ready to participate in future planning, and to offer for consideration, comments and/or potential solutions to concerns and issues that might arise during the continuation of the public process, and BLM's analysis of the Army's POD.

(UNCLASSIFIED, UNOFFICIAL, BUT OK FOR PUBLIC RELEASE WITH THIS CAVEAT)

Points of Contact:

Douglas M. (Doug) Harris, Unpaid Volunteer
Military Affairs Council,
Defense Mission Task Force
Vice President, Pikes Peak Chapter,
Association of the U.S. Army
(719) 440-1025

Dennis L. (Denny) Cripps, Unpaid Volunteer
Military Affairs Council,
Defense Mission Task Force
Member, Pikes Peak Chapter,
Association of the U.S. Army
(719) 237-9322

RECEIVED

OCT 29 2014

Bureau Land Management
3028 East Main Street
Canon City, CO 81212

10/27/2014

Dear Ms. Keohane

I recently learned about the proposed usage of BLM land by Fort Carson's Combat Aviation Brigade, to conduct HAMET training in the vicinity of my home at 440 Bernard Creek Drive in the Lakemoor West Subdivision, Florissant, Colorado and which incidentally, is within 1000 feet of the proposed landing zone #705. Additionally, many of my friends and neighbors will be directly affected by LZ's #701-706. In fact my next door neighbor is with 425 feet of landing zone #705.

First of all I want you to know that I am a patriot in every sense of the word. I served with distinction for 42 years with the United States Air Force, serving 21 years on active duty and 21 years as Deputy Director of Services at Peterson AFB in Colorado Springs, before retiring from Federal Service in 2002.

I have maintained a resident in Lakemoor West since 1975 and along with my wife and two children, have enjoyed the serenity and beauty that this incredible land has blessed us with. The elk, deer, turkey, bear and big horn sheep have provided us and our neighbors with untold hours of enjoyment, and an education that no amount of money can buy. To lay on our decks in the dark of night, in it's stillness and see the millions of stars and constellations without interference from street lights or flashing neon signs has been most memorable, and now our six grandchildren are experiencing this unbelievable gift.

I have numerous concerns on this proposal, but mostly the lack of communication to the residents and property owners in the affected areas is of grave concern. I only learned of this proposal on the 26th of October through an e-mail from the President of our Homeowners Association and an article in this weeks Colorado Springs Independent Newspaper, referencing "Army seeks chopper flights out east", which in turn referenced another article, "Hard Landings" dated 19 March 2014, revealing the Army's proposal to the BLM on the use of our area. Why have there been no

public meetings in Teller and Park counties on these proposals? What is amazing is that the BLM in Canon City has devoted untold years, the hiring of a new employee and thousands of dollars on Christos' "Over the River" art project, that when and if approved, will only last two weeks? and yet only limited communication concerning this potential 30 year agreement. No results from the 7 Oct Abby Event Complex public meeting with BLM and the Army Corps of Engineers?, that by the way appeared in a short notice article in the Colorado Springs Gazette on 5 Oct?, Sunshine Law violation?


I'm sure you're well aware that the BLM manages 8.4 million acres of public land in Colorado. Your charter directs you to manages these lands for a multitude of purposes, including recreation, mining, wildlife habitat, wilderness, energy development and livestock grazing. You are to adhere to the principles of multi-use management outlined by the Federal Land Policy Management Act. This means that you are to balance outdoor recreation and preservation of wildlife habitat, air and water, and historical values with environmentally responsible development of the land and its resources. I certainly hope that this will be your main consideration in the decision with this proposal.

My main concerns are noise, air, water and ground pollution, access to the proposed LZ's across private land, wildlife nesting and bedding habitats, probability of fires and erosion of sensitive drought stricken land along with the fauna and flora it contains, current grazing authorizations, and restricted access to hunting areas. The possibility of devaluation of our homes and land values, the probability of increased insurance costs are also of significant concern with this proposal.

Why has the US Forest Service recommended curtailing landing zones (LZ's) within the confines of the Pike and San Isabel National Forests west of Colorado Springs? and have you ordered an EPA assessment review?

Fort Carson is a valuable resource to our community and our nation, and I certainly appreciate the sacrifices our men and women endure in their mission, as I did for 42 years. However, I wonder why this was not addressed before the decision was made to transfer the Combat Aviation Brigade to Fort Carson? There are just too many unanswered questions.

This land is my legacy to the future for my family, I will do what ever it takes to insure it's preservation.



Robert P. Paige Jr.
United States Air Force Retired

cc: President, Lakemoor West Property Owners Association

RECEIVED

DEC 12 2014

Keith KED
Nancy _____

Mr. Keith Burger
Field Manager
BLM 3028 East Main St
Canon City, CO 81212

ATTN: HAMET

Keith

I want to make some additional comments concerning the HEMET proposal that was the subject of the public meeting held at the Cripple Creek Heritage Center on 4 Dec 2014.

First, I would like to thank the BLM and the Army representatives for giving a somewhat factual and detail overview of this proposal, and allowing open discussion from over 100 attendees.

All the conversations and concerns for public safety, the wildlife and property values, possible pollution of the air, ground, and water, the fire danger, sleep interruption, privacy, crossing private property, reduced public access, are all still in evidence and are paramount in you and your staff in making the initial assessment analysis.

There is one other major concern that was raised by the Four Mile District Fire Chief, who assumes liability for a fire, injury, or destruction of private property created by a helicopter incident? Capt Mathews reply was, "you, the county or the individual owner, just like any other private citizen". This admission creates a whole different level of concern and could significantly escalate individual insurance rates, mil levy increases, county fiscal policies, with possible reductions in over all community services as a result OR will the responsibility rest with the BLM who authorized the multi-use of these public lands?


I was also disappointed with the lack of information concerning numbers of Army and other military service members who could potentially receive HAMET training. The Army currently has 13 Combat Aviation Brigades, how many pilots are assigned within these units, how often are they required recertification, how many landing during the day and at night are required? By his own admission, Capt Mathews stated that the Army has

little control over the actions of the Navy, Marine, Air Force and National Guard with regards to the rules of engagement during their temporary duty while assigned to Ft. Carson. Additionally, I would assume that we would also offer this HAMET training to other foreign service members who are currently being supplied with our aircraft under International Status of Forces Agreements.

It was also evident that some of the Army's mapping data was out dated, and did not identify structural addition, roads and recent mining claim markers within the LZ'x of 701-706. You and the Army representatives need to do a boots on the ground assessment of these zones to fully understand the implications of your decision.

You have begun to pave the road to resolution with good intentions, please let everyone be assured of full disclosure and involvement in this process. In addition, I would like to wish you and your staff a wonderful Christmas celebration and a productive and prosperous New Year.

These comments and statements are solely mine as a resident of Lakemoor West Subdivision.


Robert P. Paige Jr.
440 Bernard Creek Dr.
Florissant, CO

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environmental Training (HAMET) since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office Office at: <http://blm.gov/23ld>

This scoping period will run from Nov. 19 to Dec. 19, 2014. Comments concerning the proposed action, alternatives and identification of issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments: While I fully support the goals & objectives of the HAMET program, I am opposed to the proposed extended landing zones - particularly 702, 703, 704, 705, and 706.

These sites will have a significant impact on resale value, property insurance costs, and environmental impact.

As President of the Hidden Canyon Ranch landowner Association - comprised of 323 acres owned by 7 families - they all requested my attendance & to voice our collective concern & objection with these sites.

There are thousands of BLM, State & Public lands that would enable accomplishment of HAMET's goals w/o having impact to local

High Altitude Mountain Environment Training (HAMET)

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Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments: While I fully support the goals & objectives of the HAMET program, I am opposed to the proposed extended landing zones - particularly 702, 703, 704, 705, and 706.

These sites will have a significant impact on resale value, property insurance costs, and environmental impact.

As President of the Hidden Canyon Ranch landowner Association - comprised of 323 acres owned by 7 families - they all requested my attendance & to voice our collective concern & objection with these sites.

There are thousands of BLM, State & Public lands that would enable accomplishment of HAMET's goals w/o having impact to local

area residents.

Ronald J. Santini

303 587 9954

RSANTINI@Q.COM

Attn. HAMET
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO 81212

Bureau of Land Management - Royal Gorge Field Office
Attention: Nancy Keohane
NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212

December 3, 2014

I am writing to voice my concern for the proposed "Development Plans" submitted by Fort Carson regarding expanded landing zones associated with the High Altitude Mountain Environmental Training (HAMET) Program. As a property owner and President of the Hidden Canyon Ranch Land Owners Association, I've been asked to represent the expressed concerns from the families owning property in Hidden Canyon Ranch. Hidden Canyon Ranch (HCR) lies just north of Lakemoor Drive in Teller County. All of these properties adjoin BLM land and were developed and purchased with the expressed purpose of providing seclusion and tranquility in a "mountain-getaway" setting. HCR is centered between two large wildlife Conservation Easements with Jack Gaffney's ranch to the south and west and Lynn Wilkinson's ranch to the north – both of which are now protected properties. BLM lands surround the ranch. The HCR properties encompass 323 acres composed largely of rugged panoramic terrain - with steep, heavily timbered hillsides and ridges which provide refuge to local wildlife (Deer, Elk, Big Horn Sheep, Mt. Lion, Bear).

As a strong supporter of the U.S. Military, I understand the need for these type training programs. I come from not only an Air Force family, but having worked in the Helicopter Manufacturing Industry. My concern is with the proposed BLM Landing Zone locations nearest Lakemoor Drive and Hidden Canyon Ranch (i.e. **702, 703, 704, 705 and especially 706**). Aside from the increased noise stemming from overhead flight operations and landings, of major concern is the potential risk of fire should there be any accident. Given the dangers related to training pilots to fly at low levels over dramatic topographical changes and high-altitude landings with changing wind/air currents, the risk of a fire could have significant consequences to land, homes, livestock, wildlife, etc.. As we have experienced first-hand with occasional lightning-strike generated fires in the area, the terrain makes it extremely difficult to contain even small fires and places considerable strain on the local volunteer fire departments and their resources. Several area Real Estate Agents state that land and home values would see a negative impact to resale values and increased insurance costs should this program move forward with the proposed sites.

With the vast amount of BLM, State and Public Land to the south and west of this area, it seems the goals and objectives of the HAMET program can certainly be accomplished with far less environmental impact to residents ...and with less overall risk to property and its value. As such, I strongly urge the BLM and Fort Carson to consider evaluation of other landing sites for the HAMET Program.

Sincerely,



Ron Santini
President of Hidden Canyon Ranch Landowners Association
Teller County
rsantini@q.com
303 587 9954

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environmental Training (HAMET) since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office Office at: <http://blm.gov/231d>

This scoping period will run from Nov. 19 to Dec. 19, 2014. Comments concerning the proposed action, alternatives and identification of issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

SCOTT ADAMS (BOARD MEMBER OF PIKES PEAK HISTORICAL SOCIETY)
PPHS: 18033 TEWEL CT RD 1, FORTISSANT, CO 80816, (719) 748-8259
COMMENTS: adams.s.a@juno.com

- 1) There are numerous UTE INDIAN CULTURAL SITES SCATTERED AROUND THE AREA. THE SITE INCLUDE MEDICINE WHEEL VISION QUEST LOCATIONS, UTE DEFENSIVE FORTIFICATIONS CULTURALLY SIGNIFICANT PRAYER TREES. THESE SIGHTS NEED TO RESEARCHED AND THE SIGHTS CATALOGUED AND AVOIDED IN ACCORDANCE WITH THE NATIVE ANTIQUITIES ACT.
 - 2) THE CO ANGR ALREADY DOES HAMET OUT OF EAGLE COUNTY. THAT TRAINING IS FAR MORE EFFECTIVE. ANY TRAINING AT LESS THAN 10,000 DOESN'T REMOTELY SIMULATE AFGHANISTAN. TWO UNITS DOING THE SAME IS WASTE.
 - 2a) MIN ALT SHOULD BE 1000' OVER DENSE POPULATION AREAS - MOST OF ARE
 - 3) Careful consideration should be given to POPULATION DENSITY - NOT USING MAPS OLDER THAN 2010. BEFORE SELECT INGRESS AND EGRESS ROUTES.
- I SPEAK WITH 26 YEARS AND NEARLY 4,000 HOURS OF MILITARY SET TIME, MOST OF IT IN THE A-10, I ALSO LED THE ORGANIZATION THAT MAKES MILITARY AVIATION MAPS SO I KNOW HOW OUT-OF-DATE THEY ARE.

12/16/14

Mr. Keith Berger, Field Manager
Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212

Dear Keith Berger and Nancy Keohane,

Thank all of you for having the meeting on December 4, 2014 at the Cripple Creek Heritage Center. It was most valuable to hear the position of Fort Carson and the BLM. Keith Berger and Captain Mathews did a great job.


Let me state for the record that we are not opposed to Fort Carson training helicopter pilots for high altitude. I have a good friend that was a helicopter pilot for the Army and he stated that it is much different flying a helicopter at this altitude vs at sea level. However, the proposal did not take into effect what these training areas would do to the heavy concentration of people in the area.

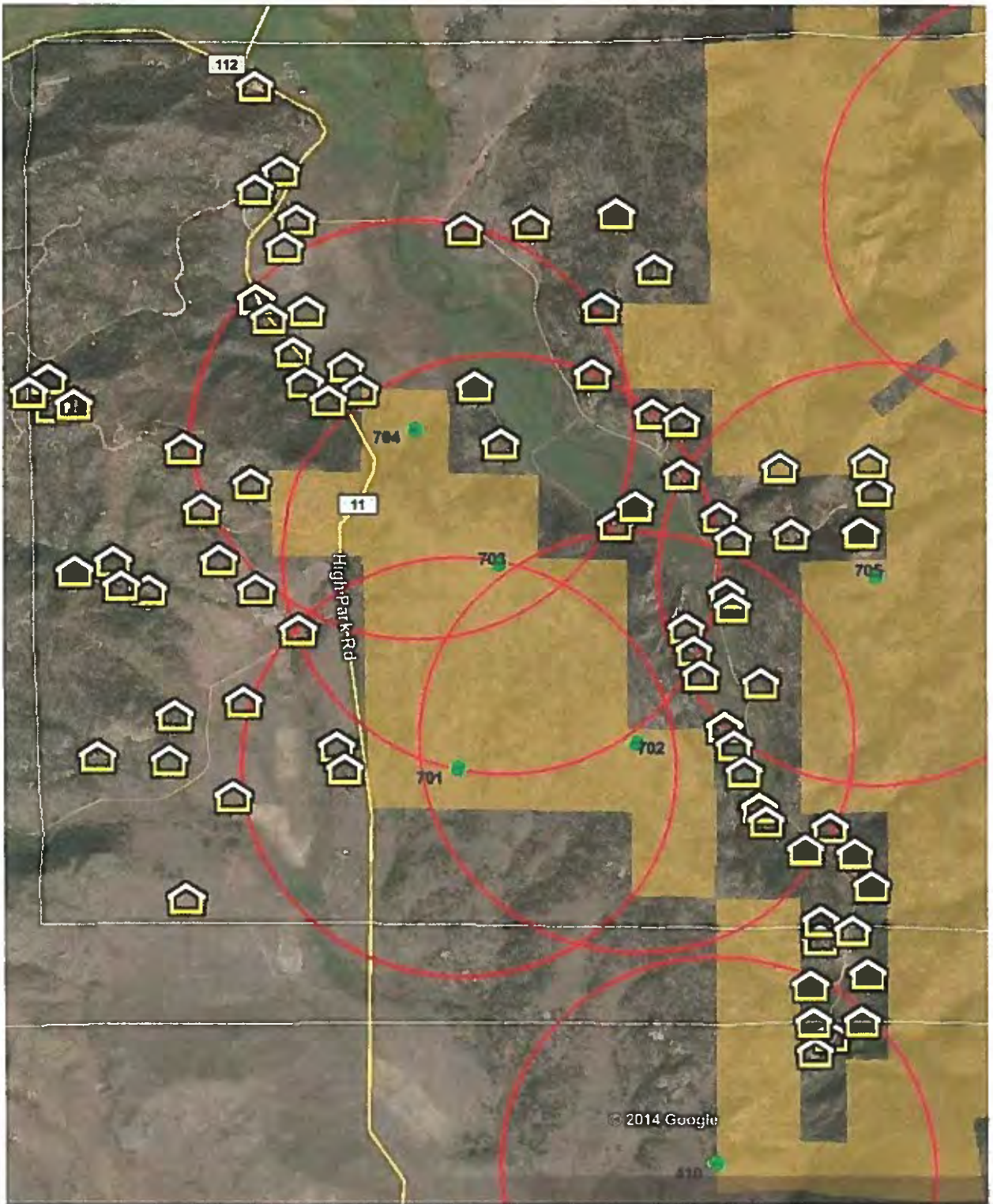
1. MTA 7 must be eliminated from the landing zones as well as MTA 4. In MTA 7 you have 46 homes impacted by the landing zones. Landing zone 704 is 1000 feet from my house and is less than 1000 feet from a neighbor's house who lives in Navajo Mesa. Landing zone 705 is 425 feet from a home being built. This is inexcusable as anyone could tell that there was a concentration of homes in MTA 7 even though Captain Mathews said that they could not see the homes. It was very sloppy work on picking the landing zones by Fort Carson. MTA 7 is in a very densely populated area as you can see on the google map showing Lakemoor West houses in green diamonds and houses in close proximity to Lakemoor West in yellow diamonds. (See Lakemoor and surrounding area map) MTA 7 is in an extremely high wildfire area as designated by the Coalition for the Upper South Platte. (Wildfire Hazard Rating map attached)
2. Lakemoor West has a total of 46 houses, within the 1000 meter circles, directly impacted by MTA 7 and LZ 410. All other landing zones have a total of 3 houses identified within the 1000 meter circles. Please see the map of Lakemoor West showing the 1000 meter circles and the homes affected and also the Red Zone Houses document showing the number of houses in each landing zone.
3. MTA 4 must also be eliminated in that it is less than 1000 feet from the end of Lakemoor West Subdivision and with a home at the end of the valley. The owners have stated that when a helicopter flies over their dishes rattle as well as other things in their house. In MTA 4 is an extreme canyon that if there was a fire there would not be a way to stop it before it got to Lakemoor West. It would be like Waldo Canyon fire and you know the disastrous results that that fire incurred. See the wildfire map attached provided by the Coalition of the Upper South Platte. The owners of the Shiloh Ranch which is in MTA 4 has stated that helicopters have almost hit their windmill which would crash a helicopter and probably burn down the homes in that area. Below the Shiloh ranch is the Green Ranch. This ranch has an Elk wintering area and

also there is a lot of cattle calving going on. It is known that helicopters can disrupt the calving operation for a rancher. Please look at the maps attached showing the concentration of housing and the wildfire danger provided by the Coalition for the Upper South Platte.

4. In reviewing all of the MTA areas you will find that landing zones 701, 702, 703, 704, 705, 706, 401, 402, 404, 405, 406, and 410 are in the Species and Wildfire areas. The species map shows that these areas are in the Big Horn overall range and are very close to the Big Horn production areas. Also areas 701, 702, 703, 704, 705, 706, 410, 401, 402, and 403 are in the Colorado Natural Heritage Program Conservation Area which is a protected area for biodiversity area as shown in the Coalition for the Upper South Platte Conservation Area map. Also there is a letter from Carol Ekarius, Executive Director for the Coalition for the Upper South Platte giving her concerns for these landing zones. See attached.
5. Surrounding MTA 7 is the Gaffney Ranch and BLM land that is leased to the Gaffney ranch. The ranch is dependent on the BLM lease that they have to graze cattle on the BLM land which is in the MTA 7. It is a known fact that the noise of helicopters can have an adverse effect on the calving operations of the ranch. With MTA 7 being so close to the ranch itself and with the grazing rights that BLM has leased to the Gaffney ranch, it would appear that MTA 7 should be totally eliminated as it directly affects the rancher's ability to produce income.
6. With all the 37 other Landing Zones and only 3 homes affected it would be in the best interest of the BLM to make sure that homes are not affected by the HAMET. Landing Zones 701-706 and 401-410 should be removed as Landing Zones due to the high wildfire danger, the Big Horn production area and the migration of Elk. MTA 7 and MTA 4 are very close to CR 11 which is a scenic byway. The area is dependent on the road for recreation and the gambling in Cripple Creek. As stated by the 4 Mile Fire Department Fire Chief, helicopters flying close to CR 11 are bound to cause automobile accidents when flying within close proximity to the road. By removing MTA 7 and MTA 4 Fort Carson will have 27 Landing Zones which should be enough for the training that they estimated they will have.

With regards to the above information and the information that was brought forth at the Cripple Creek Heritage Center meeting on December 4th, 2014 the BLM should totally eliminate MTA 7 and MTA 4 from the Fort Carson HAMET. As stewards of the land and making sure that the land is used appropriately for recreation and hunting there is no other choice that you have but to eliminate those areas. Again we are not against the training that is necessary, it just needs to be located in areas not heavily populated, in an extreme fire danger area and in Big Horn Sheep areas.

Sincerely, 
Stephen T. Witcher
196 Elliott Drive
Florissant, CO 80816
719-689-0783



Map provided by K. C. Jones

RED ZONE HOUSES

The "Red Zone" is the 1000 meter circle around an LZ where low level training flights down to zero feet altitude above ground level (AGL) are allowed.

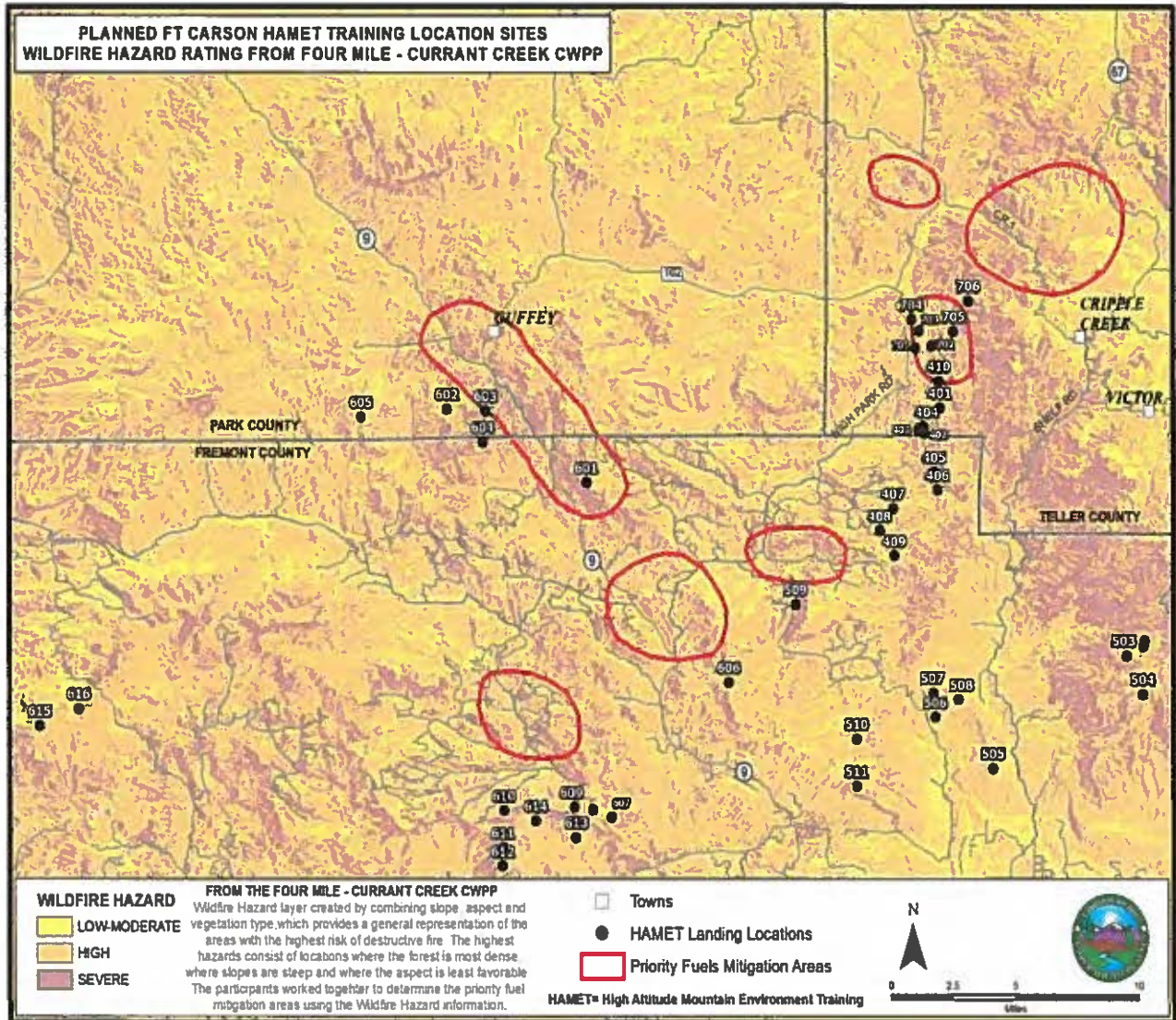
Total Number of Lakemoor West and Neighboring Houses in the Red Zone of Six LZ's (410 and 701 thru 705)

410	05
701	03
702	06
702+703	01 (702+703 says the house is in 2 red zones)
702+705	06
702+703+705	01 (This house is in 3 red zones)
703	02
703+704	04
703+705	01
704	11
705	06
TOTAL	46

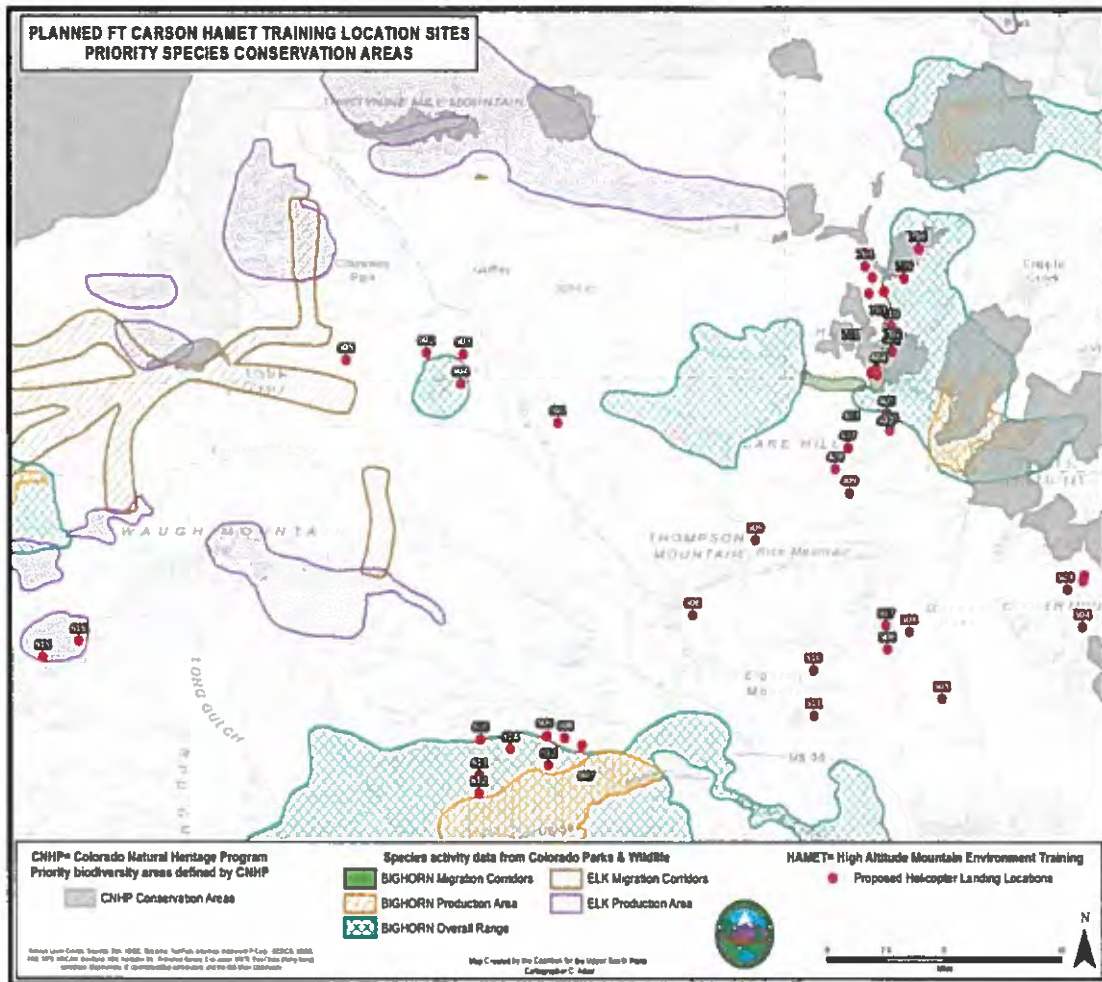
Total Number of Houses in Red Zones for All 37 Other LZ's

401 thru 409	02
501 thru 511	00
601 thru 616	01
706	00
TOTAL	03

Document provided by KC Jones.



Map provided by the Coalition for the Upper South Platte



Map provided by the Coalition for the Upper South Platte

Please Email a copy
to me

High Altitude Mountain Environment Training (HAMET)

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Name: Valerie Clinkenbeard

Email address: valc80911@gmail.com

Comments:

My husband & I moved to CC a year and a half ago, partly to get away from the military environment in Colorado Springs & Fountain. We love CC, Mike and Ken is an avid cyclist, so we are very concerned about the environment and "promoting" our town.

Our experience with Ft. Carson during the years we lived in FtW / CS:

1. Fires - Ft. Carson did maneuvers even on red flag days against fire fighter's direction that caused fires. I've seen the burn!
2. Noise - The noise from both ground maneuvers and aircraft is loud & sometimes makes your house vibrate. Recently we've noticed more helicopter activity over our house.
3. Lack of respect / care for the land: tree damage, fires (already mentioned), pollution.
4. Road damage: Convoys and tanks are very hard on roads. CC can't afford more damage.
5. I believe this conflicts with our focus on tourism and the initiatives underway to promote it.

Please, if anyone is interested in pursuing this, contact Fountain residents and hear for yourself what it's like in a military environment.

Please Email a copy
to me

High Altitude Mountain Environment Training (HAMET)

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Name: Valerie Clinkenbeard

Email address: valc80911@gmail.com

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Please, if anyone is interested in pursuing this, contact Fountain residents and hear for yourself what it's like in a military environment.



Fwd: Fw: Fort Carson proposed agreement with BLM

Keohane, Nancy <nkeohane@blm.gov>

Thu, Oct 30, 2014 at 10:36 AM

To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: Keohane, Nancy <nkeohane@blm.gov>
Date: Thu, Oct 30, 2014 at 10:36 AM
Subject: Re: Fw: Fort Carson proposed agreement with BLM
To: Dave Adams <dave4u6084@yahoo.com>

Thank you Mr. Adams I did receive your email I think our BLM emails sometimes go to the spam/junk mail boxes. We will add your name to our mailing list and will be back in touch when we have a document ready for review.

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Thu, Oct 30, 2014 at 7:21 AM, Dave Adams <dave4u6084@yahoo.com> wrote:

Nancy, I am forwarding this letter we sent last Sat. to make sure you got it. Steve Witcher told me you had sent an acknowledgement and I hadn't received one so didn't know if you had it or not. Dave Adams

On Tuesday, October 28, 2014 6:44 PM, Dave Adams <dave4u6084@yahoo.com> wrote:

On Saturday, October 25, 2014 2:55 PM, Steve Witcher <stevew@ccvnet.net> wrote:

Great letter.

From: Dave Adams [mailto:dave4u6084@yahoo.com]

Sent: Saturday, October 25, 2014 2:37 PM

To: stevew

Subject: Fw: Fort Carson proposed agreement with BLM

On Saturday, October 25, 2014 12:53 PM, Dave Adams <dave4u6084@yahoo.com> wrote:

To whom it may concern,

We are writing as concerned citizens living in Lakemoor West neighborhood which is adjacent to the proposed northern most

BLM site off High Park Road (LZ 701-706). Our property actually adjoins this BLM land. We are both patriots and believe in the military 100%. (Dave is a proud Viet Nam vet.)

We do however feel that this particular location so close to the valley we live in is inappropriate for these exercises. We understand that several years ago the Army used these sites on a limited basis for their landings and according to neighbors who were here at the time the noise pollution of the helicopters coming in so low over our valley was very unpleasant to many of the people living here. Some problems also occurred with scaring of livestock. Another consideration is a negative affect it may have on home prices in the neighborhood.

We are not familiar with all of the BLM sites but know specifically a couple of miles to the south BLM land that was on your map would be a much better location as it would not impact a neighborhood but only large tracks of ranch land.

We feel that giving our military support in their training exercises is extremely important but do feel this particular location would be best unused.

Sincerely,

Dave and Joy Adams

89 Ranch View Rd.

Florissant, CO 80816



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

Harvey Ammel <ammelteach@gmail.com>

Mon, Dec 15, 2014 at 3:54 PM

To: rgfo_comments@blm.gov

Dear Sirs,

I am writing regarding the high altitude environment training proposed in the area of the highway 9 corridor. While I understand the need for the military to train, it would be better in a less populous area. I strongly object to the proposed training due to the excessive noise. This would be detrimental to local wildlife and would disturb the many residents of this area.

Thank you for your consideration.

Harvey Ammel



Fwd: HAMET

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Mon, Dec 29, 2014 at 12:12 PM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----
From: Sundance <info@sundanceleather.com>
Date: Wed, Dec 24, 2014 at 7:53 AM
Subject: HAMET
To: "Keohane, Nancy" <nkeohane@blm.gov>

Greetings of the season!
Thanks, Nancy for forwarding this contact info to me. I would like to add our NO vote to the proposed HAMET activities in our area. We will add our voice to the comments made against, and the reasons are many and aforementioned. I would add that there be some sort of tally of the yea and nay votes that is made public, especially if this project moves forward, so the citizens in the area can see if this public opinion process really is a democratic process, or merely a requirement that is a waste of everyone's time.
With the peace and health of all living things in our area in mind, I sincerely hope that the voices of the people are heard. My husband is a Viet Nam Vet and the PTS aspect of helicopter maneuvers is a very real threat to him, rather than just an inconvenience. The public lands are just that, public lands, not military basis. There are areas like CAMP HALE that are established, high altitude training grounds, so there really is no need to expand into other areas.

Thank you for forwarding these comments on to the correct contacts, and thanks for your time.

Sincerely
Jean Anderson
800 FWN Dr
GUFFEY
CO
80820

----- Original Message -----
Subject: HAMET activities and BLM
From: "Keohane, Nancy" <nkeohane@blm.gov>
Date: Wed, December 17, 2014 12:55 pm



Fwd: HAMET activities and BLM

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Mon, Dec 29, 2014 at 10:45 AM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----
From: Sundance <info@sundanceleather.com>
Date: Sun, Dec 28, 2014 at 10:09 AM
Subject: RE: HAMET activities and BLM
To: "Keohane, Nancy" <nkeohane@blm.gov>

In regards to the proposed army helicopter maneuvers
..... I'm against them in any form . Having survived as a combat vet in Viet Nam I'm
extremely sensitive to the noise that takes me back to my war experience. Thanks for
allowing me to express my opinion though I'm aware of it's lack of value to the Army. from
Barry Andrson

----- Original Message -----
Subject: HAMET activities and BLM
From: "Keohane, Nancy" <nkeohane@blm.gov>
Date: Wed, December 17, 2014 12:55 pm
To: <info@sundanceleather.com>

Thank you Jean for your call today. Please feel free to email me your comments on the HAMET proposal or
visit us in person at the BLM office.

The HAMET web site address is:

<http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

Comments can be sent to: RGFO_comments@blm.gov or my address at nkeohane@blm.gov

Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environment Training since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html> This scoping period will run from Oct. 1 to Nov. 1, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts at <http://blm.gov/3zld>.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

To whom it may concern:

I am writing to express my opposition to Fort Carson's proposal to use public lands in Fremont County for helicopter training. I am a land owner in MTA 6E and I purchased my land with the intent to build my retirement home there. This area was chosen for its peace, quiet and natural beauty. While many may be captivated by military helicopters, finding them "cool" or "exciting," they are, in reality, loud, obnoxious and irritating. I work in Colorado Springs, very close to Peterson AFB, and directly in a flight path for commercial and military air traffic. Just today I was on the phone when a helicopter flew overhead; I had to stop my customer mid-sentence and ask them to refrain from speaking until it had passed because it was SO loud and disruptive. I am CONFIDENT that I speak for not only myself, but my neighboring land owners, when I say that this type of disruption, on a daily basis, is NOT our idea of peace, quiet and natural beauty. Our property and quality of life will be significantly devalued if this

proposal is approved. Fort Carson is currently sized at 140,000 plus acres, with another 235,000 at the PCMS. I know the Army thinks they need 400,000 plus more acres to adequately train their personnel but I'm sorry, I disagree. Fort Carson needs to STOP putting their training needs above the quality of life of its private sector neighbors. Please understand that without the hard earned tax dollars of those of us in the private sector, there would be no military. We are all asked to "thank a soldier" on a daily basis. Perhaps it is they who should consider saying thank you, rather than trying to take our land and/or destroy our rural living environments. Please DENY Fort Carson's proposal to use public lands in Fremont County for helicopter training. The landowners in the potentially affected areas worked very hard for what we have; please let our "thank you" be that we are left alone, to live without the sound of helicopters overhead and in our backyards.

Attn. HAMET
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO 81212

From: **boulos ayad** <boulosayad@gmail.com>
Date: Sun, Feb 22, 2015 at 8:17 AM
Subject: HAMET Scoping Report
To: nkeohane@blm.gov

Hi Nancy,

Thanks for speaking with me last week about my concerns about the militaries request to use Public BLM Lands for high altitude mountain environment training (HAMET). Today I ask that you include my comments and concerns in the upcoming Scoping Report. As a local land owner (SW Teller County) I don't want the Army flying helicopters (or anything else) over my horse and hunting property. As a tax payer I furious that the Army feels that the HUGE acreage currently allocated for training is not enough and further that were investing in helicopters at all. Should we tell them the Air Force has silent drones? Here in the 21st century helicopters seem as antiquated as bows and arrows or boomerangs. At least boomerangs are silent! From a constitutional point of view this would be defined as a "Standing Army" during peace time (50,000 landings per year)! Please take no action on the militaries request to use public lands for making a bunch of unnecessary noise...Thanks so much!

Boulos B. Ayad
1571 Arapahoe Dr.
Florissant, CO. 80816
720-270-9257

P.S. Please do keep me informed and feel free to add me to any mail or email lists. Also do pass along my comments and contact info as needed.



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

gumbie1038@aol.com <gumbie1038@aol.com>

Wed, Dec 17, 2014 at 9:37 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

To whom it may concern,

I am a landowner in the proposed HAMET area. I oppose the proposal as written. The amount of noise and aircraft activity in the proposed areas would be detrimental to wildlife and livestock not to mention the people who live in those areas.

Thank You , Ray Baron



HAMET

Lowell Benishek <lowell.benishek@sbcglobal.net>
Reply-To: Lowell Benishek <lowell.benishek@sbcglobal.net>
To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Mon, Dec 15, 2014 at 6:53 AM

Lowell Benishek
Dr. Julie Molitor, DVM
Building at 1315 Chris

Crossover

Canon City, CO 81212

lowell.benishek@sbcglobal.net

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Office, Bureau of Land Management, 3028 East Main Street
Canon City, CO 81212

Transmitted via email: rgfo_comments@blm.gov

Subject: Comments regarding the proposed High Altitude Mountain Environment Training NEPA

Dear Ms. Keohane,

My wife and I own property in Canyon Springs Ranch which is under the proposed 6E Mountain Training Area (MTA), and are currently building a home on our 35 acre parcel. I am an Air Force veteran. We currently live in a large metropolitan area, seven miles from a dual use civilian/military airfield. We do occasionally experience military helicopter traffic transiting to and from the airfield. Generally, although these helicopters are at least 1000 feet away, they do cause the house to vibrate and interrupt conversations in the yard. One of the reasons we purchased our property in Canyon Springs Ranch was to get away from this environment.

Some of our comments and concerns are as follows:

1. The BLM and the Army did a poor job of notifying people who live, work, or own property under the proposed MTAs. We only learned of the proposal on December 4. I checked with a realtor, a construction contractor and a general aviation pilot, all who live and work in that area – none had heard of the proposal. Over half of the lands under the 250,000 acres of proposed MTAs are privately or state owned.

The BLM and the Army must, via mail, notify all of the individual land owners underlying the MTAs of this proposal and then open another public comment period (with associated public meetings).

2. The BLM included in their request for public comment an 'Exhibit 4, Noise Study'. This noise study was commissioned by the US Army Public Health Command and is dated 06 October 2011. It is an

environmental health noise study required in preparation to stand up a new heavy combat aviation brigade at Fort Carson. This study is specific to Fort Carson and pertains to the addition of a combat aviation brigade. The provided noise study has little to no applicability in understanding the change in noise environment and the impact people and animals would experience under the proposed MTAs. The Army wants to do what are essentially air combat training maneuvers as low as 80' AGL over privately owned lands. In addition, it wants to use scattered BLM parcels as landing zones in the 250,000 acres of proposed MTAs. The provided noise study indicates that at 200' distance, all expected models of helicopters will generate a noise level of around 90 decibels. There was no data provided in the study for the noise level at an 80' distance. A sudden appearance of noise in excess of 80 decibels invokes a 'startle effect' in humans and animals and can result in a 'fight or flight' reaction. Repetitive exposure to this kind of stress is detrimental to the well-being and health of the individual. The scope and magnitude of HAMET activities upon the natural and human environments under the MTAs has not been determined.

A noise study specific to the environs underlying the MTAs must be performed. A full environmental impact study should be done. The Army should provide records of all noise complaints regarding helicopter noise in the Fort Carson training areas for the last ten years, 2005 – 2014. The Army should provide records of any claims of damages due to helicopter noise during that period.

3. There have been comments regarding military helicopters landing on privately owned land during the casual use period.

The Army should supply records of unintended landings on private property. The Army should supply records of instances where mechanical failures or crew error resulted in unscheduled landings. This would be for all helicopter activity controlled by Fort Carson in the ten year time frame, 2005 – 2014.

4. There will be a detrimental economic impact in the region due to the proposed HAMET activities.

A study should be done to estimate the economic impact resulting from changes in market valuation of private properties, changes in the property tax base, along with changes in ranching income, residential construction, hunting, tourism, emergency services, etc.

Proposed HAMET activities are not compatible with current use of the public lands managed by the BLM or with those activities and expectations of the surrounding private land owners.

We are strongly opposed to the HAMET proposal.

Sincerely,

Lowell Benishek and Dr. Julie Molitor, DVM



Proposed HAMET

Tim Benton <donitim@wildblue.net>

Fri, Dec 19, 2014 at 12:05 PM

To: rgfo_comments@blm.gov

As a private landowner within the proposed HAMET area, I am compelled to relay several important points to consider.

- Quality of life will be changed for residents both near landing zones AND along flight paths. Helicopter sound is disturbing from a mile or more away, and especially disruptive at closer distances such as the 200 ft altitude training 'norm'.

- Pets and domestic animals can become very disturbed and even unruly when low flying aircraft 'invade' their home territory they consider safe.

- Land value will be diminished, near landing sites but ALSO along flight paths. I moved to my current location in great part FOR the quiet. I suspect most landowners did the same.

- Landowners should be provided the same considerations whether they are in more condensed population areas or sparsely populated locations.

- I fear that low flying aircraft have an adverse affect on wildlife, especially herding and migrating animals such as deer, elk and pronghorn. All of these animals call the proposed HAMET area home and currently enjoy mostly 'unstressed' activities. In-depth studies are needed to assure the wildlife can adapt to such frequent aerial disturbances. Hunters will be very interested in wildlife disturbances as well, along with State Wildlife Officials who may loose wildlife and/or revenue from hunting as these flights change wildlife habits. What assurances will exist to ensure that pilots, interested in close-up viewing of wildlife, do not "buzz" herds?

- I feel not enough effort has been made to locate alternative areas. With the activity in Afghanistan having gone on for so long, I feel other areas have already been determined good locations for HAMET, without infringing on the rights of citizens who specifically picked quiet outlying areas to live their lives.

I hope you will address these serious points with due respect and diligence.

Sincerely,

Tim Benton
Waugh Mountain resident
596 Allen Road
Canon City



HAMET

Tim Benton <donitim@wildblue.net>
To: rgfo_comments@blm.gov

Sat, Dec 6, 2014 at 7:29 PM

Please accept the following comments regarding the HAMET proposal. I live at the base of Waugh Mountain in Fremont County.

1. In the Army's noise studies, it indicates that the noise created by these helicopters is commensurate with that of activities in the surrounding area. These studies however were conducted at Fort Carson, next to Colorado Springs. This is hardly a true and accurate representation of the impact the noise will have in remote areas of Fremont, Park and Teller Counties.
2. The "Non-Installation Unit Training" PowerPoint presentation slide information regarding each rotation is discrepant between the Cañon City and Cripple Creek public meetings. Is it estimated at ten or eight helicopters per rotation? Why was this number changed between the two meetings?
3. Why is this request happening now? Why here? In light of recent military base closures, Fort Carson must worry that it might be next on the chopping block. Are they trying to get HAMET in place here to provide extra insurance against base reductions or closure?
4. Please consider that even homeowners living in less densely populated areas will still be negatively impacted by these proposed LZs (including flight paths to and from the LZs). Not living in a "development" does not diminish a landowner's rights and concerns.

Thank you.

Ms. Doni Angell

Tallahassee Area resident



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Support landing sites for Fort Carson

JerryNorma Bergeman <jnbergeman@wildblue.net>
To: rgfo_comments@blm.gov

Mon, Nov 24, 2014 at 6:56 AM

TO WHOM IT MAY CONCERN

[We strongly support the proposed use of BLM landing sites for Fort Carson.](#)

The designated sites are necessary to properly train our men and women so they are prepared when we place them in harms way.

Jerry and Norma Bergeman
253 Bernard Creek Tr.
Florissant, CO 80816
719-689-3475
jnbergeman@wildblue.net



HAMET proposal

Blair <t.blair@pcisys.net>

Sat, Dec 20, 2014 at 5:07 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Cc: Stephen Witcher <s.witcher@ccvnet.net>

Ms. Keohane,

I am a resident of Lakemoor West and I attended the presentation held at the Heritage Center. I was totally appalled when Capt. Mathews disclosed that the planning, if you want to call it that, was done with outdated maps that didn't indicated the residences in the area. This is, in fact, a relatively high, densely populated area. LZ 701 thru 705 and 410 would be very offensive, abusive and disruptive to my neighbors. They should be deleted or relocated out of the area. I appreciate your visit to our neighborhood last week. It puts a little more of a human face to the proposal and hopefully, gave you a new perspective on the actual situation. A few actual boots on the ground, so to speak. It is very unfortunate that there weren't any representatives from Fort Carson, but I don't think that they really want to deal with reality.

I appreciate your consideration.

Regards,

T. Blair Nowlin



HAMET proposal

Blair <t.blair@pcisys.net>

Sat, Dec 20, 2014 at 5:07 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Cc: Stephen Witcher <s.witcher@ccvnet.net>

Ms. Keohane,

I am a resident of Lakemoor West and I attended the presentation held at the Heritage Center. I was totally appalled when Capt. Mathews disclosed that the planning, if you want to call it that, was done with outdated maps that didn't indicated the residences in the area. This is, in fact, a relatively high, densely populated area. LZ 701 thru 705 and 410 would be very offensive, abusive and disruptive to my neighbors. They should be deleted or relocated out of the area. I appreciate your visit to our neighborhood last week. It puts a little more of a human face to the proposal and hopefully, gave you a new perspective on the actual situation. A few actual boots on the ground, so to speak. It is very unfortunate that there weren't any representatives from Fort Carson, but I don't think that they really want to deal with reality.

I appreciate your consideration.

Regards,

T. Blair Nowlin



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

RE: HAMET Project - Public Comments

Tina Bogani <tina@dtcfp.com>

Thu, Jan 22, 2015 at 11:31 AM

To: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

Thank you for your reply! And thank you for adding me to the contact list to receive any updates. I look forward to further participating in the scope and direction of this project.

Best regards,

Tina Bogani

Jefferson, CO

(719) 836-9016 phone

tina@dtcfp.com email

From: RG_Comments, BLM_CO [mailto:blm_co_rg_comments@blm.gov]

Sent: Thursday, January 22, 2015 10:54 AM

To: Tina Bogani

Subject: Re: HAMET Project - Public Comments

Thank you for your comment. I will add you to our HAMET contact list. We will be back in touch as soon as we have news or something to review.

On Fri, Dec 19, 2014 at 2:38 PM, Tina Bogani <tina@dtcfp.com> wrote:

Dear Ms. Keohane:

After studying the HAMET project, my reaction is NO! My negative assessment includes the following factors:

1. Way too large in scope.
2. Way too much noise pollution.

3. Way too much increased air and ground traffic generated.
4. Way too much intrusion on PRIVATE property.
5. Way too many opportunities for wildland fire ignition.
6. Way too many negative impacts on the land and on wildlife.
7. Way too much additional pressure on water resources.

No, no NO to this project!!!!

Respectfully,

Tina Bogani

376 Quarter Horse Rd.

PO Box 149

Jefferson, CO 80456

(719) 836-9016



HAMET Project - Public Comments

Tina Bogani <tina@dtcfc.com>
To: rgfo_comments@blm.gov
Cc: doug.lamborn@houseenews.net

Fri, Dec 19, 2014 at 2:38 PM

Dear Ms. Keohane:

After studying the HAMET project, my reaction is NO! My negative assessment includes the following factors:

1. Way too large in scope.
2. Way too much noise pollution.
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4. Way too much intrusion on PRIVATE property.
5. Way too many opportunities for wildland fire ignition.
6. Way too many negative impacts on the land and on wildlife.
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No, no NO to this project!!!!

Respectfully,

Tina Bogani
376 Quarter Horse Rd.
PO Box 149
Jefferson, CO 80456
(719) 836-9016



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET RESPONSE

Steve Witcher <s.witcher@ccvnet.net>

Sat, Nov 1, 2014 at 11:10 AM

Reply-To: s.witcher@ccvnet.net

To: "Keohane, Nancy" <nkeohane@blm.gov>, RGFO_comments@blm.gov

Nancy,


I am sending this letter to you as one of our older residents could not get it to you so she asked me to forward it to you. If you would please respond to her and to me that you received it I would appreciate it.

Thank you very much.

Stephen Witcher

Francie Bosley fhbosley@gmail.com

303-666-7497

 Bosley.docx
14K

FROM: Frances H. Bosley
825 Pinehurst Court
Louisville, CO 80027

SUBJECT: Concerns about proposed Fort Carson HAMET program

Dear Ms. Keohane-

I am a concerned homeowner of the Lakemoor West subdivision; I believe, within the proposed mountain training area
My home is on Lot 7, Filing 1 at the end of Lakemoor West Drive--perhaps 8400-9000 ft in elevation
Now single, and a handicapped senior, I am unable to read the Ft. Carson maps of the LZs Hoping to recover more fully, I had wanted to spend time in my peacefully-quiet home and be a more active member of the treasured lifestyle here...

What is the LZ for my property North and South or OVERHEAD? pls answer in the distance of feet. If one LZ is maybe 600 yards from my home, isn't that about 2 FOOTBALL fields away?

What are the negative impacts?? If one of the LZ nearby is at an elevation of 6,268 ft-(remember mine at 8,400-9,000 ft) will there be ANXIETIES about helicopter crashes and forest fires as a result of your training program?
What happens to my homeowners insurance policies? NO GUARANTEES, right? especially, since some flight may range from 25-80 ft from "targets". Even a 200 ft flight distance is hardly reassuring!!

WHY SO MANY LANDINGS?? I accept the mathematical research that approximates 20,000!!! take-offs and landing events in my area. will be right in in a BATTLE ZONE!! Even late afternoon/evening drills--there goes my evening news and restful sleep!

IMAGINE awakening with lights on all over, DEAFENING scary noise to find yourself in a BIZARRE war scene right in your front yard!! with yourself as a Major character!

So how do I have quiet enjoyment of my wonderful star-filled skies and Heavens!!

SO please rescue my valley from the NIGHTMARE you are making in our daily lives!

DO THE RIGHT THING!!!

ACCEPT that Fort Carson and its immense acreage and other requirements is the ONLY PLACE for HAMAT mountain training.

You appear to stretch the Army's credibility and integrity with the vagaries in your presentation.

Thank you for your reconsideration of this proposal.

Frances Bosley

fbosley@gmail.com



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET studies in Hawaii

Douglas W. Boucher <dwboucher3@gmail.com>

Wed, Dec 17, 2014 at 1:16 PM

To: share@guffeynews.com, utiart@gmail.com, Lee.Colburn@mail.house.gov, mbrazell@parkco.us,
rgfo_comments@blm.gov

Cc: kthbchr@gmail.com

See the following article from 2011 about an Army unit in Hawaii that did environmental studies concerning HAMET and which appears to have had a much better approach.

<http://www.bigislandvideonews.com/2011/03/20/u-s-army-to-conduct-hamet-impact-tests-on-mauna-kea/>



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

Mike Brandt <brandtmk@gmail.com>

Fri, Dec 19, 2014 at 4:27 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Thank you for allowing me to comment on this proposal. Please see my comments in the attached letter.

Mike Brandt



2014.12.19 HAMET comments.docx

159K

Michael K. Brandt

1661 County Road 88 • Guffey, CO 80820
Phone: +1 (719) 479 4140 • e-mail: brandtmk@gmail.com

December 19, 2014

Ms. Nancy Keohane
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Cañon City, Colorado 81212

Re: Comments on Review of Plan for Development of HAMET in Guffey Area

Dear Ms. Keohane:

The HAMET Plan of Development (POD) created 9/3/2013 and supplied for comments appears to be incomplete and at odds with other documents supplied.

The Mountain Training Areas (MTA) boundaries are shown in picture 3b and in presentations by Ft. Carson and BLM but their actual boundaries are not defined. These areas will be subject to 200 ft. AGL flights and establish the area subject both to higher risk of accident and higher noise levels because of the flights at such low-levels. Please define the boundaries of these areas so commenters can better assess the actual impact.

The POD requests only 234 .676 acres for right of way, but the 601-616 HLZ locations appear to be situated to maximize the amount of area encompassed by MTAs 6E and 6W. The POD allows 200 ft. AGL operations within the *entire* MTA if in transit between HLZ's within the MTA. Each MTA appears to encompass land that is not part of BLM – it would not appear that your agency can grant the use of non BLM land for low-level and nap-of-earth flights.

The HAMET plan forwarded for review does not take into account the exceptions noted in the May 1, 2013 Casual use of public land for high altitude mountain environment training (HAMET) letter from Keith Berger, Field Manager, Royal Gorge Field Office to Senior Commander, Fort Carson, CO. The exceptions in paragraph 6) of the letter eliminated 16 of the 42 proposed landing sites, yet they still appear as part of the Ft. Carson Plan of Development presentation dated 10/9/2014.

If these 16 sites are eliminated from consideration as established in the letter from Mr. Berger, I propose MTA 6E should be redrawn to incorporate HLZ 605 and BLM area and be reduced by approximately 70%. The area of MTA 6W could then be resized around HLZs and BLM land in its southwest corner, and 90% of MTA 6W would be eliminated.

The net effect would be to increase flight levels in the surrounding areas to the FAA mandated 500 ft AGL, lowering the potential for an accident and the noise affecting residents, visitors and wildlife in areas not directly part of the landing practice and the nap-of-earth flights within 1000 m of each HLZ.

The elimination of the 16 sites noted in the letter from Mr. Berger implies a higher number of flights/landings for each remaining site, raising the potential impact on each site and its surroundings. In addition, the date limitations outlined in paragraph 7) on 7 HLZ's will also push the flights/landings per HLZ higher for the remaining 19 sites that were not limited or eliminated by Mr. Berger. By grouping low-level flight activity in the reduced MTA areas each MTA could better be monitored for accidents and the attendant fire risk. This would require closer control and scheduling of the HLZ's and would also allow oversight by the military to monitor for accidents and reduce response time.

Reducing the MTA's as outlined above will lower the areas potentially affected by the higher risk associated with low-level and nap-of earth flights. The POD should be changed to reflect this and the potential of increased flights to the remaining HLZs and sent back out for comment.

Alternatively, more training could be accomplished on the land already a part of Fort Carson for the low-level and nap-of-earth flights, and limit or eliminate areas defined in the POD that are duplicated by the Fort Carson properties.

While noise and the affect of repeated low-level flights are a consideration, the big concern is an accident causing wildfire in areas that are difficult to access. The local volunteer fire departments are not trained for containment of fires started, fueled and spread by jet fuel and burning aircraft. BLM Resources are at a distance and would take some hours to arrive and start control of such an accident. The POD does not offer or require assistance from the military in the event of an accident.

Our area is dependent on helicopter supplied paramedics for services beyond the capabilities of local EMT services. Please add a requirement to the POD that any flight activity planned in the area will either

- require notification of the various local fire departments and the flight for life services in the area prior to the flights, or
- a requirement for a military contact phone that is manned 24 hours a day/7 days a week that the flight for life services or fire department can call and get all military air traffic cleared from the affected area.

Thank you for allowing me to comment on this matter.

Sincerely,



Michael K. Brandt

19 December 2014

Ms. Nancy Keohane
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Cañon City, Colorado 81212

RE: HAMET activities on BLM lands in Park, Teller & Fremont counties.

Dear Ms. Keohane:

For context, the stated mission of the BLM is,

“to manage and conserve the public lands for the use and enjoyment of present and future generations under our mandate of multiple-use and sustained yield.”

On the Colorado BLM Site, this is stated:

These public lands play a vital role in providing open space and contribute to Colorado's quality of life.

My wife and I recently purchased land in the Guffey area, with plans to build our home in this beautiful and pristine area within the next few months. We chose this particular piece of property partly due to its close proximity to BLM lands, where we wish to ride our horses in peace and tranquility.

The HAMET proposal to utilize the BLM land violates the stated missions of the BLM. There will be nothing “enjoyable” or that “contributes to Colorado’s quality of life” for the residents or the wildlife that will be impacted by this High Altitude Mountain Environment Training plan.

This POD not only affects BLM land, it affects private land that will be in the flight paths of the training exercises. Adhering to the 500’ minimum elevation above private ground is no guarantee of any sense of relief for the residences and wildlife over which these flight

paths will take. Having a helicopter passing over your head at full speed only 500' above you is literally an earth shaking experience. If you have never experienced this personally, I believe that you owe it to the public that you represent to get this experience and imagine it happening over your home repeatedly for the next 10 years.

I wish to add my voice to the others in the affected areas who have expressed concerns regarding the impact of this program.

I ask that you do not approve this proposal.

Sincerely,

Tim Bratten

Current: 9505 Shoofly Lane, Wellington, CO 80549

Future: 202 Doe Drive, Guffey, CO 80820



Helicopter noise concerns...

Brian Smith <bsmit0360@gmail.com>

Thu, Dec 4, 2014 at 6:13 PM

To: rgfo_comments@blm.gov

Hello RGFO BLM,

I would like to express my concern with the recent air traffic over my home occurring near Florence, Colorado. I nearly always spend my free time outside, and as when I can, I camp on our land by the Arkansas River. Late this Summer, I noticed constant traffic of helicopters late in to the night, which kept me awake and highly irritated. They would circle overhead and as soon as the sound started to diminish, another helicopter would be approach. This sound is total and deadens the sounds of the day and night. They seem to be using the land of the federal Correction facility as a highway. I cannot say how much this has disrupted the peace and quiet of our community, especially for those who like to spend their time outside. In recent weeks, this has become an occurrence during the day as well.

I know that the BLM's mission is to take all stakeholders in to account, and this is an exceedingly difficult job. This resident asks that you do the best you can in ensuring that the peace we enjoy as Fremont county residents is considered; this is one of the most important reasons to live here. I am deeply disturbed by this nearly constant and far-reaching sound and I hope that the residents can communicate to you that this is not in our best interest. This is not just a helicopter or two a day, this is many hours of local traffic at a near constant rate almost everyday.

Sincerely,

Brian Smith & family
Florence, Colorado



Re: BLM and Fort Carson Hamet Agreement

Keohane, Nancy <nkeohane@blm.gov>

Wed, Nov 5, 2014 at 7:25 AM

To: Randy B <conductorrandy@gmail.com>, BLM_CO RG_Comments <rgfo_comments@blm.gov>

Thank you Mr. and Mrs. Bruggink we appreciate your comments and will add you to our mailing list. When we have a document for your review we will contact you.

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Tue, Nov 4, 2014 at 9:17 PM, Randy B <conductorrandy@gmail.com> wrote:

----- Forwarded message -----

From: Randy B <conductorrandy@gmail.com>

Date: Tue, Nov 4, 2014 at 9:15 PM

Subject: BLM and Fort Carson Hamet Agreement

To: RGFO_comments@blm.gov

To whom it may concern

We are aware of the request by Fort Carson to conduct Helicopter landing exercises on BLM land on High Park Road near Lake Moor West, Beartrap, and Navajo Mountain Mesa. My family has owned property on Navajo Mountain Mesa since 1972 and have enjoyed the peace and quiet of the mountains. We have also enjoyed the Wildlife that wander thru our mountain. If these training flights take place here the peace and quiet we moved here for will be gone. It will up set the wildlife we love so much. I'm sure there are other areas that can be considered for this training that will not have as much of a impact on our area.

Thank You for your time and consideration

Randy & Wendy Bruggink
Navajo Mountain Mesa



Re: Concerns over proposed aircraft traffic- HAMET training

Keohane, Nancy <nkeohane@blm.gov>

Mon, Dec 15, 2014 at 1:04 PM

To: Cricket Buckley <fourmile@peakinet.net>, BLM_CO RG_Comments <rgfo_comments@blm.gov>

Cc: mountainsweetpea@gmail.com

Thank you Cricket for your participation in the public meeting in Cripple Creek and submitting the comment.
Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Mon, Dec 15, 2014 at 12:57 PM, Cricket Buckley <fourmile@peakinet.net> wrote:

Dear Sirs,

I attended the HAMET meeting last week in Cripple Creek and made some comments about our concerns with the proposed program. We were asked to submit them in writing - here they are.

1. Potential fire danger-

As a Fire Protection District, we are concerned that the landing zones proposed are in close proximity to housing developments and the driest part of our district- mostly scrub oaks, ponderosa pines and some juniper- The potential for a wildland fire

in these areas to escalate into an urban- interface fire involving neighborhoods with limited access, egress and limited water supplies is there. Past history has shown this potential with lightning strikes in the Wrights Reservoir fires and most recently the

Navajo Mountain Mesa fire. Should a helicopter go down, this is a major concern

2. Aircraft fire /rescue training and proper equipment-

As a small, rural, volunteer fire department, we lack the appropriate training on aircraft fires/rescue and lack proper equipment (proximity suits) to safely deal with an aircraft fire. Even with those limitations, as a tax collecting fire protection district, we

have a "duty to respond".

3. Financial liabilities-

We are a small Fire Protection District with limited funds, and Teller County has no surplus of revenue to deal with the cost of an aircraft caused fire. One accident could bankrupt our fire district as well as put a huge financial burden on Teller County.

This is based on the Army spokesman stating that off base, they would not be financially responsible.

4. Additional low level air traffic-

In our fire district, we use Flight for Life and Memorial Star on a regular basis to transport critical patients to hospital emergency departments. We average 2 to 3 flights per month year around. The odds of a near miss or mid air collision go up

considerably with the proposed military training flights.

5. Teller County Road 11 and the continuation in Fremont County, Fremont 11 are major traffic routes-

This road is the main travel route from the south to Cripple Creek and the surrounding

area- it supports gaming traffic, commuter traffic, mine supply traffic and tourist traffic as part of the Gold Belt Tour. Low level aircraft flight as well as landings and takeoffs will

distract motorists and will cause traffic accidents. We have encountered this with medical air transport in the past. The landing zones proposed are close to this main road.

Note: As to helicopter accidents, our former Fire Chief, a retired full Colonel survived two Chinook helicopter crashes, one of them very fiery. This was first hand experience. He is now our department Chaplain.

In conclusion, I hope a compromise can be found. It would seem that suitable landing zones could be found on some of the many thousands of acres that the military already has. I respect all those in OUR military, it is important that the military

respect those in the civilian sector as well. Most of our residents here in Teller County moved here to enjoy the country, its wildlife, the peace and quiet of the outdoors and be out of the hustle and noise of big city. The HAMET program as proposed

will disrupt their lifestyle. It puts residents at risk both physically and financially.

Respectably submitted,

Cricket Buckley

Fire Chief- Four Mile Fire Protection

District



HAMET no good for us

John Buckner <lidar_man@yahoo.com>

Fri, Dec 12, 2014 at 7:50 PM

Reply-To: John Buckner <lidar_man@yahoo.com>

To: "lee.colburn@mail.house.gov" <lee.colburn@mail.house.gov>, John Buckner <lidar_man@yahoo.com>, "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Dear Mr. Colburn,

Nancy Keohane,

HAMET, NO GOOD FOR OUR AREA

This not a good idea for our area, there already exists other HAMET sites in Vail and Aspen. Take it there.

This program has 47 landing zones proposed surrounding the Guffey area. Every landing zone is a 1000m-diameter circle or over 730 acres each is over 36,000 acres total, that the Army wants for training. When challenged with **court precedence** setting regarding the legality of acreage allowed for this type of application and whether the Army knew this much acreage must have an Act of Congress to obtain, the Army representative replied, "NO." He said they will not reapply properly.

This program **REQUIRES** pilots to fly 40 feet above the ground from one landing zone to another. If you look at the pictures [Exhibit 3 - Aircraft Type](#) of the helicopters that will be flying, they "will not cause any more harm than me walking through the field" it is extremely hard to believe this. The total landings the Army proposed is over **20,000 per year**. Witch is around **1,200 landings** per zone per day for every day of every year for **10 YEARS!**

Upon seeing the video : <https://www.youtube.com/watch?v=P5FDDgm0-s8>

3 of the helicopters in action, first, I noticed that the army said that there would be no more destruction than me walking across the field. This is proven wrong in the video. When landing, the wind generated was far more disturbing than my footprints. Then the video showed what it looks like when these helicopters take off. The **IMPRINTS LEFT** in the field from each one is severe. The video also shows one of the helicopters dragging the rear wheel. These **HARD** imprints will never go away from just **ONE** landing. I have a degree in Land Use with a Geology emphasis in both major and minor. Soil science was a very large part in my studies. The high alpine tundra that we live in (8,5000 feet at my house) is very easily damaged when compacted. Over thousands of landings in each zone will cause soil

compaction, resulting in loss of habitat for the flora and fauna in these areas. The plants will die, animals will leave the areas, and it will lead to quicker soil erosion in times of heavy rains. Regional flooding could occur, damaging the roads and houses both within and outside these landing zones. 730+ acres each is a lot of damage for them to cause and not worry about the consequences. Or a plan to restore these areas after they are done.

This to me seems like they never did an Environmental Impact Analysis to see what will happen. Actually, an Environmental Impact Study must be done in every landing zone. Every zone is geographically unique that the Flora and Fauna differ greatly between every zone.

When answering a question asked by fire chief, Don, of the Four Mile F.D. regarding who is responsible for responding to a crash, the Army **stated " we will run the other direction. It will be up to your local fire dept. to handle the fire and clean up"**. this will be up to us to **pay for**. Each local fire dept would have to respond.

Don also stated his concern over auto crashes that already happen when people are trying to see Flight for Life. If you put these aircraft in the air how they look there will be accidents EVERY WHERE!

Flight for Life will NOT be able to fly while airspace is compromised and people who are in need of life saving measures will not get them.

So whether you live near a landing zone or not, you will be effected by the heavy aircraft flying low.

There are many homes whose location has not been taken into account leaving many homes inside landing zones and some homes in numerous landing zones. This is because the Army used maps that they stated at a public meeting on December 4th, were in fact possibly 5 years old. To put a proposal like this together you MUST use current data to make these important decisions. I used to work for a company, which I will not name, that produced real time data and maps for **many departments of the military, and has other high contracts with them.**

It is important to note that **NO** announcements were shared with the Guffey Community or it seem even Park County in general Especially the Head people of the county. No one called our fire chief (upon recently we learned that he had a closed door meeting with the **BLM agreeing** to this. He is new to the area and does not have enough values to let the community know. This is **NOT** how a PERSON HIGH IN THE COMUNITY IS SUPOSED TO ACT. HE SOHULD HAVE NOTIFIED UD ASAP! Fire Chief Erin Mandel has failed the community in my opinion. He **did not** even let us know this was going to happen!!!!) nor our commissioner to get the word out, no one bothered to let us know that a meeting was occurring a month ago on this issue and no one notified us when another meeting was scheduled. Unless we get the Gazette out of Co Spgs, we would not have seen the Army's press release.

The Army said "it is in your local paper", we do NOT have a local paper in Guffey.

A HUGE THANKS goes out to someone named Don who sent the notice of this meeting out 2 days before the meeting!! THANKS DON! Your email gave some of us a chance to be there.

Please take the time to look over the documents I have included in this email. Look carefully at the letters from the residents. Mr. Brazell advised that his voice will not make a difference but the voice of the people is very important and he can work with our letters to make a difference in this plan. Please be sure to send your letters to the BLM and Mr. Mike Brazell at the same time and Mike has asked that all letters have your physical address and email address in them.

TIME IS OF THE ESSENCE! WRITE TODAY! THIS IS THE ONLY INPUT YOU WILL GET.

Thank you for your time. Thank you for taking this seriously. Thank you for getting involved.

John Buckner

1101 Doe Valley Road

Guffey, co 80821

719-689-2215

Nancy Keohane at the BLM rgfo_comments@blm.gov

Michael Bennett Colorado Senator 202-224-5852 in Washington 303-455-7600 in Denver Co.



HAMET, NO GOOD FOR OUR AREA

Heather Lynn <utiart@gmail.com>

Wed, Dec 3, 2014 at 6:20 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, "lidar_man@yahoo.com" <lidar_man@yahoo.com>, Heather Lynn <utiart@gmail.com>

My husband I live right underneath the flying lanes of these oversized peices of war equipment. When we first lived in our home located at 1101 Doe Valley Rd., Guffey, co 80820, we did not expect to be bombarded with military flying machines overhead that at times were merely hundreds of feet above our home. I have witnesses as we had a crew here working on cement that day. Both us in the house and them in the garage RAN outside to see what the hell was coming! It was a GIANT airplane that didn't just shake the house and the garage but we could feel the rumbling under our feet as it passed over. It was nearly this bad at some point every day before the last contract expired at the end of 2013. Maybe some find this thrilling but we do not!

Once time in the first summer we lived here, 2012, we had visitors come all the way from Bolivia. They wanted to see the surrounding area and had heard about the Hayman fire so we took them up north to see how amazing the new forest is among the burnt forest. Of course their mouths dropped at the immensity of it but you should have seen the fear on their faces when we saw two GIANT PLANES soaring up out of the canyon below us! WE WERE FLABBERGASTED!

Of course our guests from Bolivia could only talk about that part of their Colorado experience because those planes freaked them out so much that they were telling it over and over again like someone does after a traumatic event. So much for Colorful Colorado!

These GIANT PLANES AND HELICOPTERS do not belong here! Almost every photo Fort Carson shows as examples of the kind of war machines that would be flying overhead again, they show these machines in the middle of the ocean or desert. I think someone somewhere is terribly mistaken if they saw an ocean or dessert where we live. This is not the middle of nowhere as is clearly expressed by the 12,000 plus visitors to Guffey Gorge.

We, John and Heather Buckner, stand firmly against Fort Carson using our public lands this way and calling it "casual use." Walking on a trail IS casual use. Taking photos, having a picnic and camping are examples of casual use. Since when is a helicopter, bigger than my house, flying low, making more noise than should ever be allowed on BLM Land! Considered "casual use?" We purchased our property after careful consideration because it was not near to campgrounds or picnic areas where people have fires for recreation, on purpose! No one could convince us that these GIANT MACHINES are not dangerous to fly in this area. And you can't convince us either that fire is not a reality as soon as one of these war machines crashes.

We say that Fort Carson should figure out an appropriate venue for their war games because 1101 Doe Valley Road, our home and the area we live in IS NOT the place. And our area is also not the place for war veterans to get their kicks watching nostalgia fly over. We want QUIET, as such is the reason we moved here and we intend to keep it that way.

Sincerely,
John and Heather Buckner
719-689-2215

P.S. We will be attending the meeting in Cripple Creek tomorrow night, (Thursday Dec.4.)



Fwd: High Altitude Mountain Environment Training NEPA concerns

Howard Budd <howbud@wildblue.net>

Wed, Oct 8, 2014 at 9:09 AM

To: rgfo_comments@blm.gov, kenneth.w.kimber.mil@mail.mil, doraine.k.mcnutt.ci@mail.mil

Folks,

My house is at

n 38 40.650 w 105 26.165

After being at the hearing and understanding the plan sounds like there are several issues.

Anyone submitting concerns should be on a list that is kept informed of progress of this issue.

Sounds like the LZ are not the problem, but the flight paths are the main issue;

Review flight logs of pilots frequently to ensure they are abiding to post rules (they may be Marine,Navy, whatever but are under the Ft. oversight) flying over houses, cattle, and disturbing wildlife.

One thing I found interesting is the Chief Warrant Officer Kimber did not know the meaning of populated. If he does not know that how do the other pilots?

I feel that flying over any house should be at minimum of 2000 ft.

If cattle or wildlife are encountered the pilot should divert to .5 mile minimum to avoid them

Flight paths should be designed to avoid all houses if possible , if unable then to fly at 2000 ft or higher.

Review complaint areas from records at Ft Carson and avoid those areas completely.

Maintain low # of flights during hunting seasons. Sept 1 - January 31. Many hunters are from out of state and screwing up their hunts will effect the local economy in long run.

Howard Budd

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

Subject:High Altitude Mountain Environment Training NEPA cocerns

Date:Tue, 07 Oct 2014 13:50:43 -0600

From:Howard Budd <howbud@wildblue.net>

To:rgfo_comments@blm.gov

Nancy,

I have several concerns about this training. First is that they have flown over our house at 4143 County Road 5, Canon City, 81212 Fremont County 38 40.650 105 26.165 several times during both daytime and night time.

They do not maintain the distance from the house which they specify in exhibit 4. This creates noise and actual shaking of the windows and things on the walls in the house.

The sites that concern me the most are in exhibit 2 pages 22-26, because to get to them they fly near our house (many times too close). I have complained to Lori Waters at Ft Carson Public relations and she reports them.

I have been told to turn on outside lights at night on at least 2 occasions. The problem continues in spite of her efforts. Increasing the # of exercises concerns me in several ways. First is the noise when they fly over my house, second is from September 1 - January 31, these flights effect the elk and deer, and spook them. These animals are one of Colorado's primary income generator and spooking them from their normal feeding and migration pattern effects hunters and their ability to hunt them in a pristine environment. I have seen the elk scatter when these helicopters are flying nearby. I would ask that these exercises be done in more remote areas.

I am also concerned that the public was not properly informed via TV news that the hearings are going on.

I will be at the meeting tonight at the Abbey.

Howard Budd
4143 County Road 5
Canon City, Co. 81212
719-315-2315



High Altitude Mountain Environment Training NEPA cocerns

Howard Budd <howbud@wildblue.net>

Tue, Oct 7, 2014 at 1:50 PM

To: rgfo_comments@blm.gov

Nancy,

I have several concerns about this training. First is that they have flown over our house at 4143 County Road 5, Canon City, 81212 Fremont County 38 40.650 105 26.165 several times during both daytime and night time. They do not maintain the distance from the house which they specify in exhibit 4. This creates noise and actual shaking of the windows and things on the walls in the house.

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I will be at the meeting tonight at the Abbey.

Howard Budd
4143 County Road 5
Canon City, Co. 81212
719-315-2315



Hamet --opposed

Doug Busch <buschjones@earthlink.net>
Reply-To: Doug Busch <buschjones@earthlink.net>
To: hamet <rgfo_comments@blm.gov>

Fri, Dec 19, 2014 at 10:53 AM

The more information I see on the Hamet proposal the more I am opposed.

At least it should go thru a full environmental impact review. Also it should be a lease versus an easement so the BLM and the citizens have some control and ability to address issues.

The scope of this takings (proposal) clearly would completely change this area of Colorado

WILDLIFE

residents
ranchers
hikers
bikers
rafters
hunters
people in surrounding towns who make a living off tourism
etc etc etc

thanks Douglas A Busch
PS could not submit comment off of the hyper link on the BLM page

Chief of Plans and Operations
1626 Ellis Street
Bldg. 1118, Room 313
Fort Carson, CO 80913

January 26, 2015

Dear Sir or Madam,

My wife and I are pilots based out of Fremont County Airport. We fly often and have noted the increased Army helicopter training activities at our airport.

We would like to commend the Army pilots flying in our area for their courtesy and professionalism. We have often departed or arrived in our small plane to find three or four Army helicopters working in the pattern. They always let us know where they are and go out of their way to make room for our activities. They set a good example for how pilots should cooperate at an uncontrolled general aviation airport.

Regards,


Bruce & Gail Claremont
217 West 2nd Street
Florence, CO 81226



Updated comments

Raymond Clark <clark.raymond.j@gmail.com>

Tue, Dec 16, 2014 at 11:19 AM

To: rgfo_comments@blm.gov

I apologize for the typos in yesterdays comments, please replace with the following.

I wish to comment on the HAMET request from the US Army.

I am a staunch supporter of the US Military and absolutely appreciate the necessity of training for preparedness. That being said however, I do not support low level flight operations over my house.

My house is to be built in the spring of 2015 at 7800 feet above sea level located in training area 6e near Cottonwood Ridge and Delilah Peak. We spent a significant amount of money to acquire our 35 acre site, located next to BLM land, for the serenity of the area. Our largest aviation impact is silent, high altitude contrails left from commercial traffic. We don't hear any traffic from highway 9 and we really like it that way. This is our retirement home and as such we plan to be home most of the time and will therefore we would be significantly impacted by low level flight operations.

I would like the no-fly zone delineated on one of the maps to include the area of new housing along Fremont County Road 2 (Tallahassee Road) west from Highway 9.

v/r
Raymond J Clark

—
Raymond Clark



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

FORT CARSON PROPOSAL TO USE BLM LAND FOR HELICOPTER TRAINING

Valerie Clinkenbeard <valc80911@gmail.com>

Sun, Nov 23, 2014 at 5:54 PM

To: rgfo_comments@blm.gov

My wife and I moved to Cañon City about a year and a half ago from the Widefield area in Colorado Springs, which is close to Ft. Carson Military Reservation. Ft. Carson has been located there since 1942 and the city grew up around it over the years. Certainly, they were there first and have the right to operate their base as they see fit.

Living close to Ft. Carson Military Base has some drawbacks. The noise from small arms and artillery fire has become nearly constant in the last ten years. Helicopters fly overhead all hours of the day and night; fighter planes from Air Force bases nearby fly over housing developments at low altitude, creating ear-splitting noise and vibration. Range fires are common on the military reservation, started by field operations and artillery fire. Some of these fires are quite large and take several days to contain. Traffic tie-ups are common at entrance points to the base, interfering with daily commuter traffic on I-25 and other main roads.

When we moved to Cañon City from Widefield, we were so happy to leave behind us the noise and fires and other effects of military operations. We have noticed increased helicopter noise during the past year and would hate to see any additional military presence in this peaceful area. This area depends on tourism and outdoor recreation for revenue, and the area draws retirees because of its small town peaceful atmosphere. We feel that a heavier military presence in Cañon City is incompatible with the lifestyle that most people have and want here.

Kenneth Clinkenbeard



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

aconley222@aol.com <aconley222@aol.com>

Fri, Oct 31, 2014 at 3:32 PM

To: rgfo_comments@blm.gov

My name is Larry Conley and I am sending this email in opposition of the proposed High Altitude Environment Training in Teller County. We own property which is adjacent to BLM land that has been requested for use by the military for said training.

We are concerned about the wildlife in this area and our livestock which borders this area. As a landowner we use this BLM land for camping, hiking, and hunting, one of the few lands left in Teller County that is not privately owned. We feel this training would affect wildlife in the area, which our families use to put food on their tables.

Thank you for allowing public input in this matter. Please save what little land we have left for recreational use.

Sincerely,
Larry Conley



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Hamet

Richard J. Cosgrove <RJCosgrove@solomonpage.com>

Fri, Dec 19, 2014 at 4:01 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

To whom it may concern -

I wish to express my concern for the proposed helicopter passageway through the town of Hamet Colorado. I have friends in that area, and have visited on a few occasions. I would find that the proposed helicopter access would seriously detract from the areas distinct personality and wildlife. This should not be permitted. Thank you for your attention.

Richard J. Cosgrove



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

Dan Daly <dalyxxdj@yahoo.com>

Wed, Oct 29, 2014 at 5:22 PM

Reply-To: Dan Daly <dalyxxdj@yahoo.com>

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Thank you for the opportunity to provide comments regarding the proposed Plan of Development submitted by Ft. Carson for their HAMET project. I have attached my comments as a separate document. Please feel free to contact me if you have any questions or if you have trouble with the attachment. Thank you.

Dan Daly
(303) 263-0541



HAMET comments.docx
14K

Comments submitted via e-mail attachment to Bureau of Land Management, Royal Gorge Field Office at rgfo_comments@rgfo.gov regarding Ft. Carson's Plan of Development (POD) for High Altitude Mountain Environment Training (HAMET). Comments submitted October 29, 2014.

Comments:

Thank you for the opportunity to submit comments regarding Ft. Carson's Plan of Development (POD) for High Altitude Mountain Environment Training (HAMET) on and above Bureau of Land Management (BLM) lands in the Canon City area. While these comments will focus specifically on the environmental impacts of most interest to me personally, i.e., those in and around my immediate property, I am sure that others who live near or under the airspace of a Helicopter Landing Zone (HLZ) and/or Mountain Training Area (MTA) will have similar concerns.

My primary purpose is to register concerns about the actual noise and reverberation impacts to me and my family, including our animals, from low-flying military aircraft. I also have concerns about impacts to wildlife in the area and to the quality of the recreational opportunities that this area affords many hikers, mountain bikers, and rock climbers, including myself. All of these same concerns are related to the noise and reverberation impacts.

Our property is located in the Cliffside Heights subdivision in northern Fremont County, approximately halfway between Canon City and Cripple Creek and is surrounded almost entirely by BLM lands to the east, west and south, and a State School Board section in Teller County to the north. We are most concerned about noise from low-flying military aircraft to and from Ft. Carson to landing zones in MTA 4, and specifically HLZs 405, 406, 407, 408 and 409. Our property lies directly in the path between these landing zones and Ft. Carson.

In the 15 months since we have owned property in our subdivision, we have witnessed low-flying military aircraft (including helicopters, but also planes) a number of times, including most recently on Tuesday, October 28, 2014 when a Chinook helicopter flew east directly above us (presumably back to Ft. Carson) from BLM lands that abut our property to the west. The noise and reverberation that it created was significant – enough that it disrupted normal conversation and necessitated our animals to take cover. Mountain Training Area 4 and the aforementioned HLZs are all within 2-3 miles of our property, and the defined border area for MTA 4 places its eastern border within about a mile of our property. Based on the criteria presented, aircraft would be allowed to fly as low as 200 feet or lower within approximately 1 mile of our property, and above our property no lower than 500 feet. Fortunately, there haven't been many of these flights to date, but according to the presentation, the possibility exists that up to 10 flights per day could occur between Installation Unit Training and Non-Installation Unit Training. This would create a very disruptive situation for us.

One solution would be to consider establishing flight paths from Ft. Carson to these specific landing zones that avoid flying over any private property. Specifically, to the north of our subdivision is an entire 640 acre section, and to the south are many more thousands of acres of BLM. If avoiding flying so low over private property isn't feasible or practical, an alternate solution would be to consider flying at a higher altitude over any private property, only dropping down to lower altitudes once the aircraft has cleared private property. At the very least, avoiding flying directly over homes/cabins at such a low altitude seems reasonable given how relatively few structures there are in the discussed area.

Again, thank you for the opportunity to comment on the proposed HAMET plan and I sincerely hope you will consider the real noise impacts that result from low-flying military aircraft.



Comment on HAMET proposal for BLM land use

Dan Christian <danchristian65@gmail.com>

Thu, Dec 18, 2014 at 2:05 PM

To: rgfo_comments@blm.gov

I was recently made aware of the HAMET proposal for BLM land use and had some concerns.

The video showing landings and take offs doesn't do a good job a conveying the actual noise levels because the video recorder will automatically adjust it's gain based on the ambient sound level. The video should include people conversing or a radio playing at typical levels as a reference for normal activity relative to the helicopter sound levels.

I think the proposed landing site information does not adequately indicated the impacted noise regions. The FAA standard for overflight is 500ft, so I'll use that as the reference distance for tolerable noise levels.

Each landing site should show the 500ft noise zone around it. This is the region directly affected by every landing and takeoff. A number of the proposed sites are near the borders of BLM land and may have a negative affect on neighboring lands.

The proposal also includes low-level flight at 200ft between landing sites and contour flight within 1000m of each landing site.

For low-level flight, you need a corridor 916ft wide (or 458 ft to each side) of the route between each site to reach a 500ft noise distance. If all these corridors between sites (within each Training Area) are added to the map, this affects a large amount of wildlife that will have feeding and breeding disrupted by high noise levels. I assuming that low-level flight over non-BLM lands is not being proposed, because that would affect houses and violate FAA practices.

For contour flight, you need to add 500ft to the 1000m around each landing site to reach a 500ft noise distance. This creates a zone roughly 3500ft around each landing site. As with the low-level flight, the concern here is the wildlife affected. Contour flight noise levels are very high (estimated at 110db) and have a high likelihood of panicking animals and possible hearing loss.

The proposal does indicate that they will not operate if wildlife is present, but wildlife will flee (possibly panicked) whenever such a large noise approaches them.

I think the effect on wildlife from low-level and particularly contour flight is incompatible with public use of the lands and should be restricted or eliminated from this proposal. I also think that sites within 500ft of the border of BLM lands should be eliminated to avoid impact on private lands.

Thank you,
Daniel Christian
12550 Hwy 9



102 S. Tejon Street, Suite 430 | P 719.471.8183 | F 719.471.9733 | www.coloradospringsbusinessalliance.com

December 18, 2014

The Bureau of Land Management
Royal Gorge Field Office

Dear Sir / Madam,

I wish to add our support to Fort Carson's request for longer term use of public lands in Colorado for High Altitude Mountain Environment Training (HAMET).

The Army's ability to train in different types of geography and climate are essential to enabling its readiness to provide for our national security. It is imperative that our soldiers receive training in environments that closely replicates where they will be deployed.

No other location offers the high altitude mountain terrain for helicopter pilots with the additional asset of being located in close proximity to an Army post. This proximity also allows for a practical, cost effective solution to the Army's need for helicopter HAMET training.

I recognize that there are a number of individuals and groups that are in opposition due to their proximity to the training areas. I am aware that the Army is listening and addressing these issues and doing its best, within reason, to modify request to the BLM. We also believe that the Army, as illustrated by the Pinion Canyon training site, is ready and able to address environmental concerns.

With respect, we strongly recommend that you approve the Army's request for a long term agreement with the BLM for HAMET activities.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Dant".

Steve Dant
Chairman Military Affairs Council

My name is Daniel Dunn. I own a tract of land in Aspen Meadows almost directly west of Thirty One Mile Mtn. My property directly borders BLM on 3 sides. We share a 2900' boundary on the East side. I am less than a mile west off the mountain peak. I purchased this land four years ago to get away from the noise and stresses of the oil business. I enjoy the solitude that the place affords. At some point I will probably build out there, now that I am retired. I can always go out to my place and spot wildlife. I do not drive a vehicle on my property any more than I have to because I know that it does scare the animals. Come hunting season, if I drew a permit, I hunt there. I am pretty happy with my situation. I found what I want, bought it and I paid for it.

I see a number of issues regarding the proposed HAMET lease:

1. I am having a hard time understanding how you have free ranging cattle roaming on the mountain and helicopters landing and taking off. Ranchers down where I live use one small helicopter to run a whole herd of cattle for roundups. If the cows are running loose around helos, it looks like a recipe for an accident to me. We have a lease with a local rancher whose cattle run back and forth between BLM and Aspen Meadows property owners' places. I plan to continue using my property for grazing as long as I own it.

2. Noise. I have a little experience with helos. I spent 5 years working offshore Gulf of Mexico and in the Arctic years ago. Helicopters are loud. They scatter wildlife. Ranches down south use helos to count Whitetail. They really spook when a helo comes over. Its possible for a service to photograph every Deer on a ranch. Its often done at the beginning of deer management programs. If a small helo has that much impact, I think a large military helo would be worse. It will be hard to convince me that that helos taking off, landing and hovering will not be detrimental to our wildlife experiences on the mtn. I think we need to study this some more before we make a change that impacts the wildlife.

3.Environmental. This was a good year for rain, but we have had some some pretty dry years on the mountain. The weight of your machine is going to be real hard on the grass especially in a dry year. The rotors will kick up silt and dust everywhere. Good way to lose the topsoil & grass and start erosion. Furthermore, there have been fires on the mountain due to drought conditions. What if a helo crashes? We would be asking for a forest fire.

My understanding was that there was a movement to close off roads to vehicles and change the access roads on the north and south to Horse and Foot only to keep the motor vehicles out. I am 100% in agreement. What changed? I think that the whole area around 31 Mile Mountain Area is a poor place to think about for the HAMET lease. The land, the wildlife and the landowners all stand to lose in this program. I think you should find another location. I do want to support the military. I also want to be a good steward of the land.

Thank you for your consideration.

Daniel Dunn, dadmtn@cs.com, 956-607-3122
820 Cathedral Rock Drive, Aspen Meadows Ranch



HAMET proposed training program effects on environment and local residents of Guffey, CO area

Dave Smith <toothschmidt@gmail.com>
To: rgfo_comments@blm.gov

Thu, Dec 18, 2014 at 10:35 AM

Dec. 18, 2014

To Whom it May Concern,

We have learned in the past few days of a proposed Army training program, HAMET, which would occur in the area of our property near Guffey, Colorado. This training would entail multiple, high altitude, landings and takeoffs, day and night over a period of 10 years.

Currently, we live in East San Diego County, with plans to soon locate to this Guffey, CO location. We now have frequent overflights of large helicopters, day and night, from the Marine Base at Pendleton. Speaking from personal experience, these low flying aircraft literally shake our house and rattle the windows.

The proposed area for this training has many residences scattered though out the region. Most of us keep horses and cattle, and enjoy hunting. All of us enjoy the large wildlife which inhabit the area which is pristine with little human intrusion and noise. BLM is charged with the goal of protecting and maintaining this type of wild area.

This plan would be destructive in multiple ways, and extremely intrusive in the lives of us who live in the region. The large mammals, elk, deer, bear, wildcats, and birds such as golden eagles, would be greatly affected by not only the noise, but also the presence of these aircraft. The landing of helicopters results in disturbed soil from the wheel and skids striking the ground, which would in turn create erosion and disruption of not only the landing site, but riparian habitats downhill from the origination of the erosion. These ecosystems are reliant on clean water in the streams.

We feel that a thorough environmental review, including on the ground site inspections and discussion with local residents, should be done before even considering this proposal.

To proceed, would damage a beautiful, pristine and irreplaceable resource overseen by BLM.

Sincerely,

Dave and Donna Smith
24414 Wildwood Glen Lane
Alpine, CA 91901

cc: Representative Duncan Hunter, Jr.



COMMENTS RE: HAMET

debbie koscielecki <dkdsusan@gmail.com>

Sun, Dec 14, 2014 at 1:17 PM

To: rgfo_comments@blm.gov

DRONES:

WHOSE LIABILITY IS IT IF THERE WOULD BE A DRONE/HELICOPTER INTERACTION.

HELICOPTER CRASH:

WHOSE LIABILITY IS IT.

SO MANY LZ'S:

ARE THERE NOT ENOUGH LZ'S W/31 FOR BLM AND 12 FOR FOREST SERVICE.
46 HOMES WILL BE IMPACTED IN JUST 6 LZ'S (NAVAJO MTN MESA AND LAKEMORE WEST) WITH
CONSTANT FLIGHT PATHS OVER MANY HOMES JUST TO ACCESS 3 OR 4 LZ'S.

FIRE:

SHOULD WE BEAR THE COST OF ADDITIONAL TAXES DUE TO ADDITIONAL EQUIPMENT NEEDED TO
SUPPORT THIS PROPOSAL. DON'T WE ALREADY PAY ENOUGH TO SUPPORT THE MILITARY.

HISTORICAL SITE:

WE HAVE A COMMUNITY HALL ON THE HISTORICAL REGISTRY IN THE EFFECTED AREA- IS THAT
NOT SUPPOSED TO BE AVOIDED.

PUBLIC ACCESS:

WITH THE HELICOPTERS LANDING DAY AND NIGHT AND AT RANDOM TIMES, HOW WOULD THE
GENERAL/UNINFORMED PUBLIC AVOID BEING CAUGHT OFF GUARD BY THE SUDDEN, EXTREMELY
LOUD NOISE OF A HELICOPTER ATTEMPTING TO LAND ON TOP OF THEM. AND/OR WILL THE AREA(S)
BE POSTED AND OR BLOCKED.

SMOKE:

A VAST MAJORITY OF THE HOMES IN THE EFFECTED AREAS RELY ON WOOD STOVES FOR HEAT
DURING THE COLDER MONTHS, CREATING A "SMOKE-SCREEN" OF SORTS DIRECTLY IN THE AREA OF
THE FLIGHT PATHS AND LZ'S.

RECREATION:

ONE OF THE APPEALS OF LIVING WHERE WE DO, IS THE ABILITY TO PRACTICE AND ENJOY
SHOOTING/ SKEET SHOOTING. WE WEAR EAR PROTECTION AND WOULD BE UNAWARE OF A
HELICOPTER IN/AROUND THE AREAS THAT WE ARE SHOOTING IN.

PUBLIC HEALTH/SAFETY:

WITH THE CONCENTRATION OF HUMAN PILOT PRESENCE, THERE IS AN ENVIRONMENTAL CONCERN
REGARDING TOILET/OUTHOUSE FACILITIES, WHICH ARE REQUIRED, PER HEALTH DEPT/STATE OF
COLORADO RULES
AND REGS.

SUPERVISION:

WITH NO GROUND SUPPORT, WILL EACH TRAINEE PILOT BE ACCOMPANIED BY A
TRAINED/EXPERIENCED CO-PILOT.

VOTE:

SINCE THESE ARE PUBLIC LANDS ADJOINING OUR PROPERTIES, SHOULDN'T THE FINAL DECISION BE
DECIDED BY BALLOT/PROPERTY OWNERS AND/OR BY A PANEL OF REPRESENTATIVES FROM
FREMONT, TELLER AND PARK COUNTY. (THE ABSENCE OF AN OBJECTIVE DECISION IS ALARMING!)

MEXICAN SPOTTED OWL/OTHER ENDANGERED SPECIES:
OUR HUMAN EXISTENCE IS ALSO BEING ENDANGERED.

PROPERTY VALUE/USE IMPACT:

WE CURRENTLY OWN BARE-LAND IN THE EFFECTED AREA. WE HAVE ENVISIONED DEVELOPING IT FOR RE-SALE OR AS A VACATION RENTAL.

THIS WILL BE INCOME THAT WE WILL RELY ON FOR OUR RETIREMENT.

THE IMPACT OF THE HAMET PROGRAM WOULD/COULD PRESENT A HUGE IMPACT ON US.

OUR RESIDENCE:

OUR HOME IS WITHIN THE 3000 METER LOW-FLYING ZONE OF 2 OF THE LZ'S. DURING THE "CASUAL-USE" PROGRAM, WE EXPERIENCED NOISE AND VIBRATION. THE NEW PROPOSAL WOULD COMPOUND THIS PROBLEM DRASTICALLY.

WILD LIFE/ BIRDS:

OUR PROPERTY INCLUDES 2/3 MAJOR WILDLIFE CROSSINGS. ALONG WITH THAT, OUR LARGE OUT-CROPPING OF BOULDERS HOUSES SEVERAL SPECIES OF LARGE/SMALLER BIRDS. WE HAVE SEEN LARGE, COMMERCIAL AIRLINERS TAKEN DOWN BY BIRDS. WHOSE TO SAY THIS IS NOT AN EVENT THAT IS POSSIBLE/PROBABLE, HERE.

HUMAN IMPACT:

THE ATTENDANCE AT THE PUBLIC MEETINGS SPEAK TO THE HUMAN IMPACT OF THIS PROPOSAL. ARE THERE NOT OTHER AVENUES TO RESEARCH, TO MOVE THE 6 LZ'S IN THE NAVAJO MTN MESA/LAKEMORE WEST SUBDIVISIONS TO A LESS POPULATED AREA.

BEING NEIGHBORLY:

OUR PROPERTY BORDERS BLM LAND. WE HAVE BEEN GOOD NEIGHBORS AND CUSTODIANS. SHOULDN'T YOU AFFORD US THE SAME.

PSYCHOLOGICAL IMPACT:

WITH THE OBVIOUS DANGERS AND RISKS OF THE HAMET PROGRAM BEING EVER PRESENT, AND OUR PREVIOUS EXPERIENCES WITH FIRE/EVACUATION, ETC. THIS PROGRAM PRESENTS TERRORISM AT ITS BEST. WE WILL BE FORCED TO MAKE A 10 YEAR LIFESTYLE CHANGE. OUR FEARS WILL BE ENHANCED AND OUR SO CHERISHED PEACE AND SOLITUDE WILL BE SHATTERED.

WILLIAM F. DIETRICH

DEBBIE KOSCIELECKI

5277 HIGH PARK RD./NAVAJO MTN MESA



RESPONSE TO BLM/HAMET SUMMARY

LaNeve Dilts <redwing@skybeam.com>

Sun, Dec 14, 2014 at 3:39 PM

Reply-To: redwing@skybeam.com

To: RGFO_comments@blm.gov

TO WHOM THIS MAY CONCERN:R

Recently, we went to a meeting at the Heritage Center in Cripple Creek, CO to listen to the plans proposed between the BLM and Fort Carson's 4th Infantry.

First of all, we'd like to say that we do support all branches of our military and we realize that it takes a lot of training to get the experience needed to operate the equipment and aircraft proficiently. However, we know there are other areas that would be feasible sites that would not be as heavily populated and that wouldn't be as impacted as we would be here and still be within the appropriate distance needed by Ft Carson.

There are a lot more homes then can be seen from the air because of the heavy growth of pines, spruces, juniper and underbrush. With all of the proposed landing sites and flights over our homes and the whole area from Cripple Creek through the valley and to Guffey this will positively impact the quality of our lives, our livestock and wildlife. Wildlife will simple leave the area after awhile- livestock would probably avoid this area if they weren't fenced in. People are another story. Our property values will drop of course, (who would want to live with the noise and possibility of crashes during a training exercise?) for the next ten years.

People who live in this area are here for specific reasons. The quiet, wildlife, beauty and we think healthier lifestyle, are just a few of the reasons. All of that would be changed and after the ten year period, would take ages to return it to what is was like originally.

Another thing that needs to be taken into consideration is business. Everybody knows that it would affect their business no matter what it is. In our case, we feel the bottom would fall out or our vacation rental business. We will have to change our advertising about the peaceful, quiet and beautiful vacation 'in the mountains' to be truthful to include military aircraft constantly flying over and possibly landing closely to wherever they would be, but the dust and noise level would make most people want to leave and demand their money back- so we will need to disclose all this in our advertising, and there goes our business. Our business brings in income to other establishments in the area, ie- restaurants, gas stations, casinos, stores, museums, etc., etc.

And another reason for the military to seek a better area is the danger to homes and the forests. Should there be a crash while training, and especially at the low-level heights described in the HAMET Summary, our fire dept. would have to respond, of course,

and since it is all volunteer it isn't easy to get any fires out, let alone, fires with fuel from a crash. If there would be a crash, it would be difficult to rescue some of the Ft. Carson or other military from some of the mountains in this area where they are proposing to practice.

We are asking that all parties considering this proposal would reconsider and look elsewhere in a less populated area to do their training.

Sincerely,

Don and Lenni Dilts
10807- CR 102
Guffey, CO 80820

e-mail redwing@skybeam.com

Attn. HAMET
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO 81212
rgfo_comments@blm.gov

On behalf of Worsham + Loos we appreciate the opportunity to comment on the High Altitude Mountain Environmental Training (HAMET) for the Combat Aviation Brigade stationed at Fort Carson, CO. We would urge your agency to give positive consideration and ultimate approval to this very important expansion of the Fort Carson training mission

The purpose of HAMET is to provide helicopter pilots the experience and skills required to operate aircraft safely at high altitude in mountainous terrain prior to deploying to areas with high elevations and rugged topography. Fort Carson is the preferred site for this type of aviation training, which is conducted by units deploying to mountainous regions in support of the Global War on Terrorism. This training is imperative for combat deployments to mountainous regions because it prepares aviators to operate at high altitudes where there is less power available to conduct maneuvers such as takeoff and landings.

The use of public land in Fremont, Park, and Teller Counties is necessary to ensure the HAMET program exposes pilots to a wide variety of situations and challenges. The HAMET program utilizes 16 landing zones on public land through a special use permit issued by the Forest Service. These LZs are not adequate to meet the need for a variety of locations, and limiting HAMET activities to the Forest Service LZs could result in a higher rate of use than is desired by the Army, the Forest Service, and the public.

Therefore, the need of the Army is for the Bureau of Land Management to issue a right-of-way grant (ROW) to allow Fort Carson access to certain public land, as described in Section 2 below, to provide an additional 43 LZs for the HAMET program (approximately 234.676 Acres)."

The primary user of HAMET would be three different units stationed at Fort Carson - The 4th Combat Aviation Brigade (CAB), the 1-25 Attack Reconnaissance Battalion and the 11th Aviation Regiment (US Army Reserves). Every aviator in those units would receive Mountain Qualification training through this program. In addition, as the Army considers future stationing needs, to include a potential BRAC, one of the strengths of Fort Carson is its unique high altitude location. There is no other location where this type of training is occurring.

Beside the significant economic impact, the Fort Carson based helicopters have been critical in recent years in fighting wildland fires, not just in Colorado Springs, but also at locations like the Royal Gorge fire

in Fremont County, and have provided critical evacuations in other disasters such as flooding and assisting with livestock operations in blizzard conditions.

The Federal Land Policy and Management Act (FLPMA) directs public lands to be used for "multiple use and sustained yield". One of the allowed uses is that by other federal agencies, to include administrative processes such as that being followed in the case of the HAMET application.

The Army is not seeking to have the lands permanently set aside, rather they seek the ability to make temporary use within the conditions established by the application. Therefore these lands are meeting the multiple use direction as the public will continue to have access to these lands outside of each specific training event.

We thank you for the opportunity to comment on this important program for our region and our national security. Please do not hesitate to contact me directly for questions and comments about our position.

Sincerely,

Kathleen J Flood

KATHLEEN J. FLOOD

555 COUNTY RD 781

WOODLAND PARK, CO 80863

719-338-4792

Teller County



HAMET

edward franz <edfranz67@gmail.com>

Thu, Dec 18, 2014 at 10:41 PM

To: rgfo_comments@blm.gov

We see problems with the proposed increase in the number of helicopter flights in the Tallahassee area. The increase is very significant and the result will have a negative impact on the safety, health and economy of the area. Some of our concerns are described here.

There are several hundred residential properties in this area. About 1/3 have homes for full and part time families. Owners of properties without homes bring their RVs for vacations. In particular, we live full time in the Autumn Creek subdivision adjacent to Fremont County Road 2 which has about 72 properties. Most of our neighbors ride horses. The unexpected noise and sight of helicopters will spook a horse and likely result in injury to the horse and/or rider.

The area has numerous uranium mining sites from the 1950's. These unmarked sites have open pits where radioactivity has tested at levels unsafe for people. Low level helicopter flights may spread the contaminants over a wider area.

The EMS and fire fighting resources are very limited and are staffed by volunteers. Increasing the helicopter flights will suddenly increase the demand for emergency services significantly. The local financial resources are not currently available for significant improvements in emergency services.

The proposed increase in the number of flights increases the risk for fires in this residential area. Why should home owners bear the cost for higher insurance premiums when the increase in risk is caused by others?

The noise report you have provided appears to apply to the Colorado Springs area where the background noise is significantly higher than in the Tallahassee area. Added noise will be more disruptive. From our home we can hear a single vehicle over a mile away.

One of the maps is poor quality. The print is not readable. We didn't see any map that included the homes along the flight paths. You can't adequately address health and safety if you don't know the location of current and potential future homes.

We appreciate your consideration of our concerns.

Sincerely,

Ed and Diane Franz
120 Rosebush Road
Canon City, CO 81212



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Hamet

Heather Gaffney <gaffney12@icloud.com>

Wed, Oct 29, 2014 at 3:39 PM

To: "RGFO_comments@blm.gov" <RGFO_comments@blm.gov>

To Whom it May Concern,

I am a resident and rancher in the Lakemoor West area. I am writing due to my concern reference the possible landing zones 701-706 that Fort Carson is wanting to utilize for training. I am strongly against this because of the impact this will have on my livelihood as a rancher. My ranch borders the BLM and the landing zones are on the property I have leased from BLM for the past 40 years. This can cause major problems with the cow/calf operation. The calves can be scared away from their mothers due to the noise from the aircraft, causing the calves to run off from their mothers, become lost and possibly even die. Not only will this have a negative impact on my livelihood but it will impact other uses of what BLM is intended for such as the wildlife, hunting and hiking. This will also cause property values to deflate. I understand that the military needs training but there are other options where residential properties and especially a ranchers livelihood will not be impacted.

Sincerely,
Jack Gaffney

Sent from my iPhone



HAMET Dissent!!!!

Garland, Rose <Rose.Garland@hp.com>

Fri, Dec 19, 2014 at 7:42 AM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

To Whom it May concern,

I am a retired member of the military and I oppose this effort. I do not need to go into detail as you have numerous letters from my neighbors who also oppose this request and I second each and every listed problem they have detailed.

We moved to the mountains to have peace and quiet and to enjoy the wildlife and after years of listening to what I call the "sounds of freedom" (F-16s and other aircraft flying overhead), we wanted quiet and made the move. Enough said, please do not harm the natural beauty of where we live when you already have sufficient space allotted for your training. I oppose this effort!!

Thank you,

Rose Garland

Pike Meadows Resident

261 Valley Dr

Guffey CO 80820



HAMET

Denny <dgibeson@kc.rr.com>

Thu, Dec 18, 2014 at 1:08 PM

To: rgfo_comments@blm.gov

In the Fall of 2010, we fulfilled a life-long dream of purchasing property in Colorado. We chose the Guffey area for many reasons, but foremost was the retirement property we purchased is in a very isolated area. We love the quiet, the views and the wildlife. Our property is in Aspen Meadows Ranch. Ft. Carson's HAMET Landing Zones 602, 603, 604 and 605 are literally in our backyard. More than a mile of our property boundary line adjoins the BLM and the proposed access area.

We have invested years of time and money into our property, creating a way of life we choose. When we purchased our property we were not at all informed of the "casual use" by Ft. Carson, which began shortly after our purchase. While we did not live here full-time until April 2013, we heard firsthand horror stories of helicopter landings between 10 p.m. and dawn in close proximity to our neighbor's home with lights shining in the windows.

It's disconcerting to find out that Ft. Carson has requested a 10-year Right-of-Way on the BLM property, which adjoins ours and we weren't even notified until after the first public meeting had taken place. A 10-year Right-of-Way for such activity would severely impact our lives, those of the many wildlife species that inhabit our area, the vegetation, the cattle who graze here and our domestic animals.

We did attend the meeting December 4 in Cripple Creek. It was discerned there that Ft. Carson has not even been using current maps to assist in choosing these sites. While we are not a highly populated area, helicopter activity in our area will impact most everyone in the Guffey area, with flights to and from Ft. Carson. Low flying helicopters flying between the four LZs adjacent to our property would be very disruptive to our lives. Emergency situations were discussed at the meeting with the Army seeming to have no real plan for fire, property damage or human harm.

In addition, the Army's proposed landing zones 602, 603 and 604 are right where Commnet is proposing to establish a cell tower. Cellular access in this area is non-existent. Their tower would provide much needed service to the Highway 9 corridor south of Guffey, as well as service to the town.

LZ 602 is directly behind our house within 800 yards. Late night flights would be quite disturbing for us, particularly with young grand kids and elderly parents. Can you imagine what it would be like for a 2-3 year old or an octogenarian parent to be violently awakened in the middle of the night with the roar of thundering war machines?

LZ 605 is line of sight within a mile of our home and directly behind our neighbors.

Unexpected helicopter fly-over/landings are not positive for the wildlife or livestock. This activity will move the elk herds out of our immediate area to those without intrusion. Our land and surrounding BLM ground is leased to grazing. A stampede of frightened cattle in the middle of the night or day is not good for man nor beast.

The Army proposal allows for eight assault landings per day per landing zone – up to 32 occurrences per day, day and night. This would be like living next to an airport runway. We didn't buy our property to be on a runway.

Our soils and plant life up here are very fragile. Prop wash will do irreversible damage to both. The proposed Right-of-Way is on BLM land that the public can only access by foot or horse back.

The BLM has over 240 million acres at their disposal. The National Parks have an additional 84 million acres. There must be other land alternatives in less proximity to residences, than these proposed by the Army.

We were not aware of this planned intrusion when we purchased our property. If these landings become a normal occurrence our property values will be greatly reduced. If there were eight landings per day, per LZ, our property will be worth zero. Who will reimburse us for our loss?

We love our military and all they do to keep us safe, but we are disappointed that the proposed Right-of-Way has not taken into consideration concern for private citizens and their rights. In addition it appears that there has not been appropriate research and study into the lands and animals this Right-of-Way could impact.

This type of long-term Right-of-Way needs to be properly assessed not from the Internet or old maps or the air. The Army and BLM need to visit the areas impacted and visit with the residents to make proper assessments. Ft. Carson and the BLM need to come see what will be disrupted in this special place we call home.

Given the 10-year timeframe of the proposed HAMET and the worst-case scenarios presented, this could easily become a living nightmare with no safety net for us. We would hate to see this area and access become an extension of the Fort Carson Military Base.

Respectfully submitted,

Denny and Bonnie Gibeson
Guffey, CO 80820

816-898-4435
dgibeson@kc.rr.com



Re: HAMET project

gloria gierhart <jgsunsetmtn2@gmail.com>

Thu, Dec 4, 2014 at 9:32 AM

To: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

Nancy, we were planning on attending the meeting tonight, but had a death in the family (my aunt) and so will be going to her funeral and have to leave either tonight or very early in the am. Sorry will miss all the news and do hope this thing doesn't go through. We are neighbors of Randy and Wendy Bruggink on Navajo mtn mesa
Gloria and Jack Gierhart

On Thu, Dec 4, 2014 at 9:17 AM, RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov> wrote:

Dear Gierhart,

Thank you for your comments. I wanted to make sure that you know there is a public meeting tonight at the Heritage Center in Cripple Creek tonight from 4:30 - 7:00 pm. We do have a internet page with more information at <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html> .

Thanks, Nancy

On Thu, Dec 4, 2014 at 6:14 AM, gloria gierhart <jgsunsetmtn2@gmail.com> wrote:

this is absolutely a bad idea with so many developments it would impact. The noise would be unbearable and it would affect wildlife, cattle and who knows what else.

This is just too close to homes.

Gloria and Jack Gierhart

Navajo Mountain Mesa



Fwd: Regarding the HAMET program

CTCHNRLS@aol.com <CTCHNRLS@aol.com>
To: rgfo_comments@blm.gov
Cc: ctchnrls@aol.com

Thu, Nov 6, 2014 at 6:04 PM

November 05 2014

NancyKeohane, NEPASpecialist

ColoradoRenewableEnergyTeam

BureauLandManagement

3028EastMain Street

Canon City, CO 81212

Dear Ms Keohane,

My wife and I reside in the Lakemoor subdivision in Florissant, Teller County, Colorado where the **HIGH ALTITUDE MOUNTAIN ENVIRONMENT TRAINING (HAMET)** program is proposed to take place.

My wife and I wish to make it eminently clear that we fully support our armed forces and the great work which they have done and continue to do in our behalf.

However the HAMET proposal is a poorly conceived and potentially disastrous program for the residents proximate to the areas designated in this project.

The map of the proposed program indicates landing zones (LZ) for the helicopter training in areas proximate to many residences, the operations will proceed "day, night, weekends and holidays for a total of approximately 90 days" and "Operations require continuous sorties throughout the year". "With no more than two aircraft in any one of the approved landing zones (LZs) at a time there may be up to four landings in each LZ per sortie (with a total of eight landings per day)."

The Army has offered little solace to the residents in the areas of HAMET except to say:

" Landing Zones will not be used when humans, livestock or wildlife (particularly big game, elk, deer, antelope, and bighorn sheep) are present"

It seems inconceivable that the Army would make such a proposal when it knows that many families

reside in the areas proximate to the LZ's where people live and are regularly present . This proposal is totally contrary to the Army's above statement of protections. The Army offers a clearly stated protection and in reality is not offering any protection to the humans, livestock or wildlife in the areas involved. This proposal is unconscionable and takes no interest nor concern regarding the residents in the impacted areas.

We came to Lakemoor for quietness, solitude and a retreat from the bustle of Denver. A place where we could hear the sounds of nature including our babbling brook, 4 Mile Creek, and that of the western tanager, blue jays, bluebirds, nuthatch, geese, hawk, Eagle, owl, duck, blue heron and observe the wildlife including deer, elk, bear, lynx, bighorn sheep and wild turkey, so plentiful in our area. This will all change due to the HAMET program.

Many of the residents of the proposed area are older folks who are in retirement. I personally have suffered from two major bouts with cancer which has left me in a weakened state... our natural habitat offers me and our neighbors the opportunity to heal our physical maladies and emotional and mental disturbances.

We purchased pristine property for ourselves, our children and grandchildren for relaxation, play and communing with nature. We want our family to learn the importance of nature and how it benefits mankind.

If the HAMET proposal is approved my family and I will be forced to consider a move to a cleaner location which will not suffer from pollution of noise, dust, gasoline fumes and potential fires in order to protect our health. In fact, our grandchildren have already become alarmed and fearful when they hear the loud noise and see the helicopters flying so close to them. The helicopter noise and shaking of our house, day and night, have disrupted the possibility of a peaceful sleep.

Certainly, property values will decrease with the imposition of the HAMET project.

The mission of the BLM as "set forth in the Federal Land Policy and Management Act of 1976, mandates that we manage public land resources for a variety of uses, such as energy development, livestock grazing, recreation, and timber harvesting, while protecting a wide array of natural, cultural, and historical resources".

I know that you will honor your mission as stated above by denying the HAMET program as proposed.

Sincerely , two very concerned citizens:

Lee Golub and Burton Golub
3585 Lakemoor Drive
Florissant CO 80616



Fwd: HAMET proposal:

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Mon, Dec 29, 2014 at 4:48 PM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: s.witcher@ccvnet.net <s.witcher@ccvnet.net>
Date: Fri, Dec 19, 2014 at 9:31 PM
Subject: Fwd: HAMET proposal:
To: Nancy Keohane <nkeohane@blm.gov>

Nancy,
My friend, Ken Graff, copied me on his letter to the BLM regarding the HAMET and I am resending to you because mine came back when I did not capitalize RGFO on the email address. He wanted to make sure you got it so I am forwarding it. Would you please confirm that you received it.
Thank you.

Steve Witcher
Sent from my iPad

Begin forwarded message:

From: kathleen graff <kathleengraff@comcast.net>
Date: December 19, 2014 at 1:58:42 PM MST
To: rgfo_comments@blm.gov, Steve Witcher <s.witcher@ccvnet.net>
Subject: HAMET proposal:

To whom it may concern,

I have a home near the proposed High Altitude Mountain Environment Training area and have the following concerns about the proposal:

1. The size and term of the proposal is enormous, 234,676 acres and a ten year time frame. The landing zones may be on BLM land but the High Altitude Mountain Training Areas contain a lot of acres that are private property with a number of houses located within the 1000 meters of the landing zone and subjected to the contour flying, 25 to 80 feet above the highest obstacle, and nap of the earth flying, the surface of the earth to 25 feet above the surface. These flights will be very loud and dangerous to anyone or anything in the area. The HAMET proposal states the the landing zones will not be used when humans, livestock, or wildlife (elk, deer, bighorn sheep, or antelope) are present. I do not see how the Army or the BLM could think it is a good idea to authorize landing zones where there are houses and private property within 1000 meters. The type of flying

the Army is proposing for these areas will put the public in danger from the helicopter's loud noise, and will violate their air space.

2. The noise pollution will be excessive due to the number of landings and takeoffs. It is hard to assess how much noise will be generated because the chart provided by the Army, on maximum level (db) of noise produced by each helicopter is for four of the thirteen helicopters listed in the HAMET proposal, and the chart has the noise level of the four helicopters at different altitudes from a slant distance of 200 feet to 2,500 feet. This study was completed for the Army by the Army for the Fort Carson Base and not for the type of flying that will be used in the HAMET proposal, which will be at lower distances from the ground and I assume would produce higher and more unacceptable amounts of noise. This will generate a lot of noise considering each landing zone would average 2,913 landing and takeoffs per year. Deer, elk, and other animals have more sensitive hearing than humans and depend on their hearing and sight to survive. The amount of noise and the number of sightings of helicopters would disrupt their way of living and move them out of the area.

3. Recreational use of the land in the High Altitude Environmental Training area will be effected by the noise and sight of so many helicopters. My family and I have hunted, fished, hiked, and camped in this area and think it will be lost to us and all of the other people that enjoy the scenery, beauty, and a quiet outdoor experience.

4. The lack of any plan of action to deal with a fire is a big concern. The proposal only stated that it will stop flying when they are notified by the BLM that stage III fire restrictions are in effect.

5. The saturated use of the land by the military will make it hard for others to use the land, this includes sportsmen, ranchers, hikers, and campers.

In summary I think this is a land grab by the Army and they have very little concern about the impact this proposal will have on the people living in and around the area. The need for training is there, but at what cost. I think they have other options for training, one of them being the use of flight simulators. On their web site they say Fort Carson has flight simulators for the CH-47E and the UH-60M helicopter.

Thank you for your consideration,

Kenneth M. Graff
664 Canyon Dr.
Florissant, CO 80816s



HAMET proposal:

kathleen graff <kathleengraff@comcast.net>

Fri, Dec 19, 2014 at 1:58 PM

To: rgfo_comments@blm.gov, Steve Witcher <s.witcher@ccvnet.net>

To whom it may concern,

I have a home near the proposed High Altitude Mountain Environment Training area and have the following concerns about the proposal:

1. The size and term of the proposal is enormous, 234,676 acres and a ten year time frame. The landing zones may be on BLM land but the High Altitude Mountain Training Areas contain a lot of acres that are private property with a number of houses located within the 1000 meters of the landing zone and subjected to the contour flying, 25 to 80 feet above the highest obstacle, and nap of the earth flying, the surface of the earth to 25 feet above the surface. These flights will be very loud and dangerous to anyone or anything in the area. The HAMET proposal states the the landing zones will not be used when humans, livestock, or wildlife (elk, deer, bighorn sheep, or antelope) are present. I do not see how the Army or the BLM could think it is a good idea to authorize landing zones where there are houses and private property within 1000 meters. The type of flying the Army is proposing for these areas will put the public in danger from the helicopter's loud noise, and will violate their air space.

2. The noise pollution will be excessive due to the number of landings and takeoffs. It is hard to assess how much noise will be generated because the chart provided by the Army, on maximum level (dbl) of noise produced by each helicopter is for four of the thirteen helicopters listed in the HAMET proposal, and the chart has the noise level of the four helicopters at different altitudes from a slant distance of 200 feet to 2,500 feet. This study was completed for the Army by the Army for the Fort Carson Base and not for the type of flying that will be used in the HAMET proposal, which will be at lower distances from the ground and I assume would produce higher and more unacceptable amounts of noise. This will generate a lot of noise considering each landing zone would average 2,913 landing and takeoffs per year. Deer, elk, and other animals have more sensitive hearing than humans and depend on their hearing and sight to survive. The amount of noise and the number of sightings of helicopters would disrupt their way of living and move them out of the area.

3. Recreational use of the land in the High Altitude Environmental Training area will be effected by the noise and sight of so many helicopters. My family and I have hunted, fished, hiked, and camped in this area and think it will be lost to us and all of the other people that enjoy the scenery, beauty, and a quiet outdoor experience.

4. The lack of any plan of action to deal with a fire is a big concern. The proposal only stated that it will stop flying when they are notified by the BLM that stage III fire restrictions are in effect.

5. The saturated use of the land by the military will make it hard for others to use the land, this includes sportsmen, ranchers, hikers, and campers.

In summary I think this is a land grab by the Army and they have very little concern about the impact this proposal will have on the people living in and around the area. The need for training is there, but at what cost. I think they have other options for training, one of they being the use of flight simulators. On their web site they say Fort Carson has flight simulators for the CH-47E and the UH-60M helicopter.

Thank you for your consideration,

Kenneth M. Graff
664 Canyon Dr.

Florissant, CO 80816s



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Hamet

1 message

Kathleen Graff <kathleengraff@comcast.net>

Thu, Jan 22, 2015 at 9:10 AM

To: "RGFO_Comments@blm.gov" <RGFO_Comments@blm.gov>

Please put my email on your list.

Kathleengraff [@comcast.net](mailto:kathleengraff@comcast.net)

664 Canyon Dr.

Florissant, co. 80816

Thank you,
Kathleen



Fwd: Proposed plan for Ft. Carson helicopter training flights

Keohane, Nancy <nkeohane@blm.gov>

Thu, Jan 29, 2015 at 4:23 PM

To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: Linda Griffith <mlgriffith31@icloud.com>

Date: Mon, Oct 27, 2014 at 10:56 AM

Subject: Proposed plan for Ft. Carson helicopter training flights

To: "nkeohane@blm.gov" <nkeohane@blm.gov>, "daneta.j.johnson.civ@mail.mil" <daneta.j.johnson.civ@mail.mil>

Hello Nancy and Daneta,

My name is Mark Griffith and I live about five miles southeast of Guffey at 345 Nash Lane, Guffey, Co. 80820. We live by a small section of BLM which includes Mack Gulch.

My wife and I worked for the defense industry for 30 years each at General Dynamics, Hughes, and Lockheed . We are pro military and understand the need for training on defense systems.

My wife and I are opposed to any helicopter flights in this area for the following reasons:

1) We retired in this area for peace and quiet , to ranch and hunt. The training flights we have witnessed in this area take away from all of that.

The helicopters are very loud and disturb wildlife, livestock and human enjoyment of the quiet and cause lack of sleep.

Our recommendation is to move the training location to non-residential areas in Co. It may not look like it from the air, but the area surrounding Guffey is residential. It seems there may be other areas in Co. which are not residential that could be used for training. Also flying until 10 PM, or as we have witnessed much later in to the night, does not work for people who get up at dawn to care for livestock. Thanks for listening and keep up the good work the military does for our country. We are grateful.

Mark and Linda Griffith

Sent from my iPad



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

comment, HAMET Press Release 11/20/14

Steve Hanson and Deanna Kurz <takota2k4@msn.com>

Sun, Dec 14, 2014 at 7:23 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Being one of 8 private property owner's with land sitting atop Cactus Cliff along Shelf Road and above 4 Mile Creek in Fremont County, I for one do not look forward to more helicopter fly over's up and down the creek than there's been in past years.

By using the landing site(s) described I request the BLM and Fort Carson require all HAMET activities to commence out of the north and depart the same. In doing so, fewer private citizens will be affected by the program.

Thank you,
Steve Hanson

Kay M. Hawkle, M.A.
1739 Fremont County Rd 21A
Canon City, CO 81212
khawkle@aol.com
719.275.2881

December 8, 2014

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Office, Bureau of Land Management 3028 East Main Street
Cañon City, CO 81212

Transmitted via email attachment: rgfo_comments@blm.gov

Subject: Comments to the proposed High Altitude Mountain Environment Training
NEPA

Dear Ms. Keohane,

I am a resident of Bar J Ranch Home Owner's Association in the Tallahassee Area. I enjoy a serene retirement in the area of the proposed HAMET.

BAR J Ranch HOA is one of 16 HOAs and/or Property Owner's Association (POA) in the Tallahassee Area. These were former cattle ranches that were sold to developers and broken into over 600, 35-acre or more, private residential land parcels.

The intent of these 600+ purchasers was to retire to the pristine mountain setting. There are over 250 full-time residents who are currently living out this intent in peace.

Many of these people who intend to retire to their 35-acre parcel are active military who risked their lives to be able to afford retirement in this peaceful mountain setting.

The noise created by this activity would be a significant nuisance to the residents.

I have a Master's Degree in Counseling and am aware that the noise generated could also pose as a Post Traumatic Stress Disorder (PTSD) trigger for the many veterans who live in this area. These veterans specifically chose to live in an area that is free from noise that could trigger their PTSD.

The proposed activity is in direct conflict with the Land Use for this area of Fremont County.

I am disappointed that I was not informed of this possibility so that I could attend a public meeting.

Please consider this my **strong objection** to the proposed area of this HAMET.

Thank you,

Kay M. Hawklee

Tallahassee Area Resident

Cc: CWO 4 Kenneth Kimber
Aviation Mission Survivability Officer
kenneth.w.kimber.mil@mail.mil

Cc: Ed Norden
Fremont County Commissioner, District 3
ed.norden@fremontco.com



Comments to the proposed High Altitude Mountain Environment Training NEPA

khawklee@aol.com <khawklee@aol.com>

Mon, Dec 8, 2014 at 9:18 AM

To: rgfo_comments@blm.gov

Cc: kenneth.w.kimber.mil@mail.mil, ed.norden@fremontco.com

Dear Ms. Keohane,

I am a resident of Bar J Ranch Home Owner's Association in the Tallahassee Area. I enjoy a serene retirement in the area of the proposed HAMET.

BAR J Ranch HOA is one of 16 HOAs and/or Property Owner's Association (POA) in the Tallahassee Area. These were former cattle ranches that were sold to developers and broken into over 600, 35-acre or more, private residential land parcels.

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Thank you,
Kay M. Hawklee
Tallahassee Area Resident

Cc: CWO 4 Kenneth Kimber
Aviation Mission Survivability Officer
kenneth.w.kimber.mil@mail.mil

Cc: Ed Norden
Fremont County Commissioner, District 3
ed.norden@fremontco.com



KMH HAMET comment.docx

5K



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

Kay Hawthorne <KHawthorne@h2altd.com>

Wed, Jan 21, 2015 at 3:18 PM

To: "RGFO_Comments@blm.gov" <RGFO_Comments@blm.gov>

Cc: Kay Hawthorne <KHawthorne@h2altd.com>, J Michael Hawthorne <mhawthorne@h2altd.com>

Please add my email khawthorne@h2altd.com to the HAMET contact list.



HAMET

Judith Hicks <touchstone@mailbug.com>

Tue, Feb 10, 2015 at 4:24 PM

To: RGFO_Comments@blm.gov

Hello. I am enraged for residents, human and otherwise, of the area under consideration. I live in Western Fremont County, and had the same feelings when all this started to be discussed. At that time, I wrote in the opinion column of the Salida paper, (Mt. Mail), and spoke with Ms. Koehane either re this or Christo's proposed assault on Bighorn Sheep Canyon, which is practically on my doorstep. At the time I wrote re this military problem, I wrote that "American children should not be growing up in a quasi war zone". The State of Colorado and the BLM MUST NOT permit this insanity! The NOISE POLLUTION ALONE WOULD CAUSE EXACERBATION OF INSANITY!!!! PLEASE SIGN ME UP FOR UPDATES ON THIS ISSUE, i.e., put me on your contact list. Thank you, Judith E. Hicks P.S. Though I don't live in the immediate area I can be very vocal. Also, all those flights would inevitably AFFECT THIS PART OF FREMONT COUNTY, AND IN FACT MOST OF THE STATE OF COLORADO. Heather Buckner said it perfectly, "Take your war games somewhere else."

Sent without a computer from my MailBug email machine.
landel.com, 1-855-MAILBUG, getmailbuginfo@landel.com



Comments on HAMET Proposal

Robert Hirschfeld <rch57@live.com>

Sun, Dec 14, 2014 at 3:04 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Cc: Robert Hirschfeld <rch57@live.com>

Date: 14 December 2014

To: Keith Berger / Nancy Keohane
BLM Royal Gorge Field Office

From: Robert C Hirschfeld
76 Carlton Circle
Florissant, CO 80816

Thank you for the second public meeting held on 4 December 2014 at the Cripple Creek Heritage and Information Center.

I also want to state that I fully support the U.S. military, understand these HAMET requirements and also had a 30 year career as a defense contractor supporting the U.S. Air Force here in Colorado and bases around the world. I have worked language on contracts with the U.S. Air Force and other U.S. Intelligence Operations. Understand many requirements of the F.A.R., Federal Acquisition Regulations.

The issues I want to bring up that were not discussed much at the past public meeting are the following:

1. Flight paths used to access landing zones.

Here in the Teller County area we have several great assets of Colorado's landscape such as the Florissant Fossils Bed National Monument, owned and operated by the U.S. National Park Service. Millions of new dollars have been invested in this park recently to encourage tourism. We also have Mueller State Park, owned and operated by the State of Colorado. If this training requires flight paths over these two government owned assets there will be a serious decline in tourism and purpose of what these government assets were created and funded for.

2. Responsibility for Accidents.

At the public meeting when Four Mile fire chief spoke on potential accidents, I remember hearing Captain Pete Matthews say that accidents become responsibility of the county, as well as the costs. I do not understand how a small rural county can bear this burden with potentially not enough equipment or finances to bear this burden, rather than the U.S. Federal Government. Would appreciate BLM to research the legal issues on this fact that could cripple or destroy the finances of Teller County, Park County and Fremont County.

Look forward to future information and meetings on this subject.

Respectfully yours,
Robert C Hirschfeld



Hamet response

Harvey Hisgen <harv.pike@gmail.com>

Fri, Dec 19, 2014 at 1:46 PM

To: rgfo_comments@blm.gov

December 18, 2014

To: BLM, Nancy Keohane and whom it may concern

From: Harv Hisgen, President- Pike National Historic Trail Association

Re: HAMET Training Proposal and our Response

We have several concerns about the proposed Army's Colorado Hamet right of way.

-The first and initial concern is that we only learned of the Army's HAMET Colorado proposal only yesterday and today apparently is the final date for public comment. Has the deadline been extended?

-As an association, we have not have the time to analyze the potential impacts on the Pike National Historic Trail.

We are concerned about the historic preservation of these areas of Pike's 1806 exploration which ring the Army's proposal:

-north from Cañon City into South Park to Hartsel.

-his discovery of the South Platte River

-west and south into the Arkansas watershed (Antero Reservoir and Trout Creek)

-his discovery of the headwaters of the Arkansas River

-his exploration of the Royal Gorge and

-encampments in Cañon City

-The impact by the use of the Army proposed areas could interfere with the enjoyment, health and recreation of those using our trail-hiking or using an automobile near the 1806 Pike footprint.

-We are concerned initially about the noise impact in and about where Pike traveled.

-Safety is a concern. Low-flying aircraft, the chances of helicopter mishaps, and the potential necessity to dump fuel are of concern.

-If the Army plans to practice establishing military control areas, this could have an impact on the beauty and enjoyment of others using the area. The extent of which personnel would be in the area is unclear. The repeated landings of aircraft and that impact is unclear.

-The extent to which the Army will use these sites is not clear to us.

Perhaps more remote locations should be considered, ones that are a greater distance from private property and homes.

We would like more time to study and learn of exactly what the Army plans to do and with what frequency.

Harv Hisgen, President-Pike National Historic Trail Association

10060 Blue Sky Trail

Conifer, Colorado 80433

harv.pike@gmail.com

303 912 9939





Re: Hamet response

Harvey Hisgen <harv.pike@gmail.com>

Fri, Dec 19, 2014 at 1:55 PM

To: rgfo_comments@blm.gov

Nancy,

Please add that there is a cultural and historic impact component for our concern as well as the health/recreational and educational components of our mission.

Harv

On Fri, Dec 19, 2014 at 1:46 PM, Harvey Hisgen <harv.pike@gmail.com> wrote:

December 18, 2014

To: BLM, Nancy Keohane and whom it may concern

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Harv Hisgen, President-Pike National Historic Trail Association

10060 Blue Sky Trail

Conifer, Colorado 80433

harv.pike@gmail.com

303 912 9939



Hamet

Elaine Hofmann <eahofma@att.net>

Thu, Dec 18, 2014 at 8:56 AM

Reply-To: Elaine Hofmann <eahofma@att.net>

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

During the last two summers I witnessed the helicopters practicing landings & takeoffs on the ridge (above hwy 9 between mile markers 10 & 11) across from my house . I could give you the tail numbers as they were that close. That noise was enough, but a few times they also practiced night missions & flew below the ridge above highway nine. That's way to much noise to be acceptable & I believe is called noise pollution. They could go a few miles further north on hwy 9 as there is no population. I therefore strenuously voice my objection to allowing landing zones & continues flying over our subdivision along highway 9.

Respectfully

Andrew M. Hofmann

Homeowner on top of the Mountain at

612 Lowry Lane

Canon City,CO 81212



HAMET comment

Doug Holdread <pinoncanyon@gmail.com>

Fri, Dec 5, 2014 at 9:23 AM

To: rgfo_comments@blm.gov

To Royal Gorge field office of BLM

As a citizen and a member of the public I am writing to express my opposition to the use of our public lands and public airspace for military training as by the High Altitude Mountain Environment Training (HAMET) on BLM land. I am also writing to express my concern that such military activity on public lands and public airspace will infringe upon the rights of citizens within their private property, including private land and private airspace extending up to 500 feet above the surface.

I am, in general concerned about the level of militarization that is taking place in the Southeastern quarter of our state. When I look at maps of the airspace above our region it is clear to me that our private property rights and regional economic and cultural interests are being sacrificed in the interests of the military and defense contractors. I believe that the NEPA process is being abused by the segmentation of several initiatives which are part of a larger military testing and training agenda, but are being reviewed through NEPA as if they unrelated activities. This is a violation of the spirit and the law of NEPA. The scale of militarization that is taking place in Southeastern Colorado represents profound cumulative impact upon our region and should be honestly assessed within the NEPA process.

I am specifically concerned that HAMET activities on BLM lands will deprive me of the use and enjoyment of these lands, which I believe to be my right as a citizen. Such use will further deprive the surrounding region of an outdoor recreational asset which represent a negative impact upon our tourism industry.

Respectfully,

Doug Holdread
Trinidad, CO

--
Doug Holdread
www.holdread.com
719-680-3900



Fort Carson's proposal

Brenda Hollmann <nohatranch@centurylink.net>
To: rgfo_comments@blm.gov

Wed, Dec 17, 2014 at 7:10 PM

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environment Training since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

This scoping period will run from Oct. 1 to Nov. 1, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts at <http://blm.gov/3zld>.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

We are opposed to the proposal. There should be enough Federal lands to use and not have to involve homeowners and the airspace above the private properties. The government just took another half million acres this week.

--
Brenda Hollmann
227 Shotgun Court
Jefferson, Colo. 80456
719-836-0320
nohatranch@centurylink.net



Military Training near Guffey Colorado

Stringwalkers <stringwalkers@gmail.com>

Fri, Dec 19, 2014 at 12:03 PM

To: rgfo_comments@blm.gov

Dear Ms. Keohane,

As a resident of Park County Colorado near the proposed military training center; I would like to voice my opposition to this facility.

We moved to the mountains to enjoy nature and wonder why on earth would you do such a thing? What happened to conserving the environment?

We are a proud supporter of the military but this facility has no business in this part of the state. Perhaps a less populated area in the mountains would be a better choice; farther from a densely populated area such as Denver.

Regards,

Mary Holzer
Pine Junction, Colorado
720-206-4095



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

Anna Horton <annahorton11@yahoo.com>

Thu, Oct 30, 2014 at 11:36 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

To whom it may concern-

Please do not allow the military to do the high altitude training in areas specified. This area is used by so many for outdoor activities such as hiking, camping, hunting, getting away, and the added noise would be unacceptable. Please do not allow this.

Concerned,

Anna Horton

805 Kiowa st

Fountain, CO 80817



NO to HAMET in Fremont and Park County

Mark Howard <markhoward2012@gmail.com>

Thu, Dec 18, 2014 at 6:45 PM

To: rgfo_comments@blm.gov

Nancy,

Following a careful review of the HAMET of the USARMY, I enter my opinion against it for Fremont and Park county, Colorado.

I am former Force Protection for USARMY ASG (Ariel Support Group) Bosnia, of which Apaches and Blackhawks and have a up close and personal knowledge of the problems this will introduce to our counties in terms of noise aggravation to the local populace, and impact to wildlife here where the excessive blade flap could and most likely will have devastating impact to the endangered birds all up and down the canyons and Arkansas river.

Lets put this into perspective, the request by the USARMY is not even rationale or logical. Currently, the ravine laden regions of Pinion that are accessible are satisfactory for many low rugged terrain yet high altitude regions that are identical to terrain features and appearance as Afghanistan. The facts are that you get all the ideal topographical and wind current and cross current conitions associated to Afghanistan up in Lake County and National Divide. The Leadville Municipal airport in Lake County serves as the sister airfield to Ft. Carson where they have landing and fueling rights as it is, and the surrounding former Camp Hale region of the 10th mountain division. No need to build something new, it already exist. It is ironic the Army claims these training manuevers will save lives, yet when Apache units from Kentucky, prior to consolidation into Ft. Carson would train up in Lake County near Leadville and Camp Hale, the opposite proved true and multiple lives were in fact lost in training accidents. Please don't buy their PR claims, multiple lives were lost and you can verify this with the US Army directly...just ask them how well things went in Lake County roughly three years ago with the units from Kentucky and what the body count of dead human flesh was. Army flesh at that.

Here, where it is much more dry and parched, would set off our region like a tinder box fire furnace blast and they wont be military heroes when it does. Altitude, topography and cross wind to slope conditions are much better emulated where they already have been doing their training,...and that should be leveraged as already more than adequet without now expanding it to here to no good purpose, and the inevitable disasterous consequences to the native species that will be killed and driven out.

Training can also occur where it really counts, and live on scene in Afghanistan itself. Impact that nations land, not our nations vital BLM lands.

NO to HAMET in Fremont and Park County, Colorado.

Respectfully,
s---/mh/---
Mark Howard

--

-/Mark Howard/

This email and its attachments are personal, confidential and or protected as intended solely for the party assigned in the address recipient box and may not be forwarded, copied, shared, cited or quoted or distributed in any means or fashion without the express consent of Mark Howard. If you are not the intended recipient, immediately notify the sender and delete/destroy any copies from your system. Civil prosecution or any law violation, rights, losses or injury recovery are expressly reserved by Mark Howard, and may further be protected



HAMET

Robert Hutchison <hutch81240@icloud.com>

Sat, Dec 6, 2014 at 3:28 PM

To: rgfo_comments@blm.gov

Greetings,

I am anxious to confirm that your no fly zone areas will be honored. My name is Robert Hutchison and I live at 1000 Red Rocks Drive in Penrose, CO. We live in a 2,300 acre development on County Road 132 called Red Rocks at Beaver Creek. CR132 is North of County Road 123 and we are about 4 miles south of the trailhead to Beaver State Park. We have had lots of helicopter activity since living here the last 5 years. Being on the board of our POA, I attended a meeting back in 2010/11 (not sure on the date) where the Garrison Commander of Fort Carson spoke at someone's residence in the Broadmoor Resort Community. At that time, they as well as myself voiced our disapproval of the low flights and in our particular instance the constant flights of helicopters. We have had helicopters fly in our neighborhood for longer than 3 hours as recently as 2 to 3 months ago. In the last year, I read a public announcement in the Colorado Springs newspaper the Gazette where helicopter flights outside the base were being suspended. Yet we witness helicopters flying low and slow over our homes and along the ridges that are to the west of CR 132 near our homes. In my case, around 3/4 of a mile.

The behavior and speech do not match up so far. If you will honor your mapping wherein the designated areas on BLM property will be used for HAMET training, then we support your training for world deployment and safety for our troops. But we certainly do not support the practice in a neighborhood of approximately 50 single family homes up and down CR 132 with activity that disturbs our sleep patterns, outdoor enjoyment, and our animal population.

I did want to attend your meeting in Cripple Creek, but was unable to due to an out of town commitment. Please keep me informed as to your decision making and any changes, along with your renewed enforcement of the allowed fly zones.

Sincerely,

Hutch

Robert Hutchison

1000 Red Rocks Drive

Penrose, CO 81240

719-290-1211 cell



HAMET at Mauna Kea

Jim Smith <jimandrobotasmith@gmail.com>

Thu, Dec 18, 2014 at 4:06 PM

To: Verene Posavad <vposavad@aol.com>, Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>, share@guffeynews.com

Check this link out [HAMETMaunaKea](#) and see it is very revealing in some ways. The citizens of Hawaii were alarmed just like us but the training was already done for a 1-year deployment in Afghanistan in 2012 for only 3 landing zones on an almost barren volcano top. What they want here in Colorado is massive in comparison with over 35,000 acres and for a period of **10 years. And they are trying to shove it through before we find out about it.** Call your Congressman, call your Senators. Who are they training for? Us? We are leaving Afghanistan. Where are these guys going? When? Is there going to be a war we don't know about? Sometime in the next 10 years? Check it out?

Thanks,
Jim

--

Roberta & Jim Smith
Guffey, Colorado
Fax: 1-866-679-5231
In God We Trust
No Longer Silent



Military landing zones proposed for area around Lakemoor West and Bear Trap subdivisions.

jimelkh@aol.com <jimelkh@aol.com>
To: RGFO_comments@blm.gov

Sat, Nov 1, 2014 at 2:28 PM

To Whom It May Concern:

While we are not anti-military in any way we would like to register our strong opposition to BLM granting ANY military landing requests in this area.

We live in Bear Trap Ranch directly West of LZ 701,702,703 and 704. Two of these are very close to our house, probably less than 1/4 of a mile. All are within 1/2 mile or less. There are many houses in this area not just ours.

We experienced first hand what it would be like to live with helicopter traffic of this type a couple of years ago. Many times these flights were very late at night waking us from sleep. During the daytime you could look at the craft as it passed above and easily see the men inside. They usually waved hello. These flights were so low that the house would vibrate, dishes would rattle and our livestock would stampede around the property. The constant low droning noise was always present when helicopters were in the area, even when they were far to the South of us.

With the army already owning 372,896 acres in Colorado (Pinon Canon 235,896 and Fort Carson 137,000) why does the army need to come into this area. I know they claim it is for high altitude training, but some of the LZs in this area are lower than some of the property the army already owns. Much of the Pinon Canon property they own is very similar to the area they want to use here.

The U.S. Forest Service is in the process of ending their agreements with the army for this type of training due in part to fuel contamination issues and other environmental issues.

We believe the impact to livestock, wildlife and recreation would be catastrophic. How much access to these public lands will there be after the army gets done restricting the areas around these landing zones, installs their support facilities, etc?

There are cattle in this area year round and they will be heavily impacted, especially during the winter and spring when it is calving season. How many cows will abort during this time due to the noise caused stress. The same consideration should be given to the deer and elk in the area. There will be no more solitude or peace. There is also the issue of accidents, fires, and other incidents that could be very detrimental to this area.

If this is a good idea why don't the army and the City of Colorado Springs work out a deal where the army can use the Pikes Peak south slope water shed for helicopter training? The area is isolated, private, high altitude and has been severely access restricted for many years. It is also much closer to Fort Carson.

We apologize for the long comment. This area is very near and dear to our heart. We live here for the peace and quiet, and the recreation opportunities. This is not the area for helicopter training and we urge you to deny any use of these areas for this activity.

Sincerely,

James E. (Jim) McGee
Rhonda J. McGee
1863 Sioux Road
Florissant, CO 80816
Residence address

P.O. Box 305
Cripple Creek, CO 80813
Mailing address

Attn. HAMET
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO 8121

December 19, 2014

I am writing to provide further comments on the Army's proposed Plan of Development for HAMET operations in Fremont, Park, and Teller counties. These comments are in addition to those I submitted on October 31, and reflect new concerns that have surfaced as a result of further consideration of the proposal.

I want, first of all, to reiterate that I question the legality of this entire process. The Army is asking BLM to grant a Right of Way that encompass thousands of acres of private property. The project offers zero advantage to BLM or the users of BLM land. It poses severe threats to quality of life and land values for private property owners. I do not feel that inviting the public to provide "input" constitutes adequate due process for a proposal that could so profoundly affect the entire region, particularly given that the BLM's reliance on press releases for providing public notice about the proposal has been grossly inadequate. BLM's failure to notify landowners in and adjacent to the Army's proposed training areas, along with other stakeholders such as emergency service providers and individuals who hold grazing leases on the affected lands, strikes me as dismissive if not negligent. This impression was reinforced by the failure to record comments at the public meeting in Cripple Creek on December 4.

While the NEPA process, as summarized in the BLM's public presentation document, is meant to assess an application that is supposed to encompass the "maximum level of anticipated use by the Army within a 10 year period," the Army's proposal specifically states that the numbers provided for Home Station Unit use represent "minimum intensity of use" (3.c.1; page 6). This misrepresentation is perpetuated on the BLM's web page, which states that "The POD represents the highest level of use the Army projects could occur on BLM lands." Why is the assessment continuing in light of the Army's failure to respect basic criteria in its proposal document?

Along with these procedural concerns, I offer several additional issues that should be addressed in the BLM's review.

The Army should be required to provide noise information for helicopters operating 25 feet above the ground. The noise study posted online only provides measurements down to a slant distance of 200 feet, while the plan of development calls for low-level flights as low as 25 feet in the vicinity of landing areas and 80 feet throughout the training areas. Army personnel are surely expected to wear protective equipment in the proximity of operating helicopters. What protections will the Right of Way agreement provide for homeowners, hikers, bikers, hunters, and the like who will be subject to low-level helicopter noise, as well as exhaust and blowing dust?

Regarding noise impacts on wildlife: Summary information provided at www.noisequest.psu.edu indicates that noise levels of 95 dBA can cause temporary loss of hearing sensitivity in terrestrial mammals. According to the Army's numbers, an AH-64 Apache helicopter at 200 feet generates 92 dBA. What are the effects when a helicopter is at 25 feet?

Although the effects of noise on animals' hearing (which is, for them, a matter of life and death) is of great concern, other adverse effects on wildlife include changes in home ranges, foraging patterns, and breeding behavior. Such shifts would have significant implications for BLM as a land management agency, since helicopter landings and low-level flying will undoubtedly cause both wildlife and livestock to avoid areas of heavy use by aircraft. This avoidance behavior will effectively reduce the amount of grazing land available. Combined with the potential for overgrazing in quieter areas, HAMET would reduce the carrying capacity of the affected landscape. Those grazing impacts would not just affect public lands: The potential for reduced productivity on private property means that this proposal amounts to a taking of land and not just a taking of peace and quiet.

People will also exhibit altered land use preferences, as hunters and other recreationalists will seek out areas less affected by helicopter traffic. Increased visitation in quieter areas will exacerbate land management challenges—and costs—throughout the region, not just in the areas specified as landing zones.

The Army's plan does not specify steps to avoid conflicts with other aircraft, including hobby drones, ultralights, or Flight for Life helicopters.

Finally, the plan of development does not include a complaint process for landowners or other parties affected by helicopter landings or overflight. Should the plan of development move forward, proposed alternatives should specify a mechanism for public reporting. These complaint procedures should be minimally demanding of landowners and users of public lands, of whom too much is already being asked. Members of the public should not be expected to identify the type of aircraft or provide complete tail numbers (neither of which can be obtained at night or in the case of high-speed flyovers) in order to file a complaint that will be recorded and deemed worthy of follow-up and/or redress. Complaints should be tracked and tied to specific accountability measures to be carried out by the military, regardless of whether the offending aircraft was from a Home Station Unit or not. Penalties and remedies should be specified in the BLM's recommended alternatives, so that the public has an opportunity to review and comment on these procedures before they are enacted. The terms of the Right of Way agreement should specify at what level violations are sufficient to warrant a termination of the agreement. If the citizens of Fremont, Teller, and Park counties are to be asked to share the airspace around our homes with Army helicopters, the least we can expect is that pilots comply with basic standards of safety and civility.

Respectfully submitted,
Andrea M. Jones

Sean K. Kane
1576 Tallahassee Lane
Canon City, CO 81212
seanandbev@gmail.com
719.275.3440

December 12, 2014

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Office, Bureau of Land Management 3028 East Main Street
Cañon City, CO 81212

Transmitted via email attachment: rgfo_comments@blm.gov

Subject: Comments to the proposed High Altitude Mountain Environment Training
NEPA

Dear Ms. Keohane,

I am a resident of Bar J Ranch Home Owner's Association in the Tallahassee Area. I enjoy a serene retirement in the area of the proposed HAMET. This is the primary reason I purchased here for my retirement...peace and QUIET

BAR J Ranch HOA is one of 16 HOAs and/or Property Owner's Association (POA) in the Tallahassee Area. These were former cattle ranches that were sold to developers and broken into over 600, 35-acre or more, private residential land parcels.

The intent of these 600+ purchasers was to retire to the pristine mountain setting. There are over 250 full-time residents who are currently living out this intent in peace.

The things that I enjoy are going to be destroyed by these fly-overs. Elk and Deer will cease migrations through the area, birds and other fowl, seeking quiet environments will flee. This sounds like insignificant issues, but I rely upon Elk and Deer for food as well as turkey. You will literally be taking food off of my table. As a retiree on a fixed income, this is a big issue.

The noise created by this activity would be a significant nuisance to the wildlife, residents and ruin the serene nature of the area...the whole reason we moved here.

The proposed activity is in direct conflict with the Land Use for this area of Fremont County.

I am disappointed that I was not informed of this possibility so that I could attend a public meeting.

Please consider this my **strong objection** to the proposed area of this HAMET.

Thank you,

Sean K. Kane

Tallahassee Area Resident

Cc: CWO 4 Kenneth Kimber
Aviation Mission Survivability Officer
kenneth.w.kimber.mil@mail.mil

Cc: Ed Norden
Fremont County Commissioner, District 3
ed.norden@fremontco.com



Army Helicopter Training

John & Kathleen <jkkearney@hotmail.com>

Mon, Dec 15, 2014 at 12:08 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

I am writing this as a comment on the proposal to increase the helicopter training and flyovers in Fremont county. I realize that army personnel must keep up on modern and updated training. I do have two concerns, however. As a resident of one of the most beautiful areas in the U.S., I do not want to see the terrain and wildlife suffer as a result of the training. I would ask that every consideration be given to this so that the training is done with the least possible environmental impact. Additionally, as a resident of the north Canon City area, I would ask that the flights are not excessive over this particular area due to the noise made especially if significant numbers of helicopters will be involved. I would hope this is considered during late night/early morning hours as well. Thank you for the opportunity to express my concerns. John Kearney



HAMET

Karen Kinne <karenk_133@msn.com>

Thu, Dec 4, 2014 at 1:41 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

To: Nancy Keohane, BLM

Nancy,

I am writing in regards to the HAMET that is being proposed by the government. I am a resident of the Guffey area and am opposed to this proposed project. The proposed project would literally make our Park County/Teller County/Fremont County a "war zone" with this proposed HAMET. The residents in these remote areas did not move out to these locations to have thousands of helicopters flying in and out disrupting the solitude. Just as important is the negative impact it will have on the wildlife in the proposed fly/land zones. I just found out about this proposed project today, as well as the 2nd community meeting being held up in Cripple Creek regarding this topic. I plan on attending this meeting to voice my objection. The community has been blind sided to this proposed project, I have not seen any official proposals or public notifications until today when it was brought to my attention by a friend. **Please listen to the community regarding this proposed HAMET, it is unwelcome, it is hurtful not only to the community but to the local wildlife!**

Sincerely,
Karen Kinne
262 Post Road
Guffey, CO 80820
719-689-2326



HAMET

Keith C. Klaehn <kklaehn@aol.com>

Sat, Dec 20, 2014 at 12:08 AM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Dear BLM Representative:

As a former Army Aircrew member with multiple assignments to Ft Carson in the 70's, 80's, and 90's I can personally attest that this sort of very important flight crew training has been conducted in the unrestricted airspace of this same general area going back over 35 years.

Due to significant changes in aircraft power requirements and flight characteristics at these altitudes routine flight can be challenging enough but, the pinnacle and confined area practice landings at elevation are invaluable. These conditions cannot be realistically duplicated or simulated at Ft Carson or at or near most other Army bases in the country.

Countless military men and women, and their grateful families, have benefited either directly or indirectly over the years from this specialized training conducted in this challenging environment. Only the most fortunate amongst us has not benefitted from the fact that virtually every Flight for Life Pilot or other Aerial Rescue or Aerial Firefighter aircrew has been similarly trained, mostly via their military service.

Having said all that I am encouraged to see that in recent years more disciplined measures have been incorporated in the conduct of this training by obtaining the appropriate use permits and I am glad that all of the proper procedures are being followed in this application process. Formalizing the program and a more disciplined approach can only serve to improve upon the training that has been ongoing for all of these many years.

This process should also include the following:

For the safety of not only our citizens but also the aircrews in training our local first responders should be familiarized with any special requirements in the event they are called upon to assist in an emergency involving an aircraft.

Additionally, any proposed landing sites as well as the routes to and from and between them should be carefully selected and reconnoitered and de-conflicted for maximum training benefit with minimal impact on the environment or its inhabitants.

For those of us who might feel inconvenienced by the occasional intrusion of our tranquility we might take some comfort in the certain knowledge that the aircraft we're seeing or hearing is a friendly. Not everyone around the world possesses that confidence.

For all of the aforementioned reasons and with the proviso's stipulated I STRONGLY SUPPORT this proposal.

Regards,

Keith C. Klaehn

Sent from my iPad



Re: Per Helicopter landings on blm land:

Keohane, Nancy <nkeohane@blm.gov>

Thu, Dec 4, 2014 at 9:43 AM

To: DeEtta Komarek <deekomarek@hotmail.com>, BLM_CO RG_Comments <rgfo_comments@blm.gov>

Thank you Mr. and Mrs. Komarek for your comments. We will add you to our mailing list and will be in touch soon. Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Sat, Nov 29, 2014 at 8:21 PM, DeEtta Komarek <deekomarek@hotmail.com> wrote:

My husband and I are not able to make the meeting scheduled for Dec. 4th, but are adamantly against the helicopters coming to our area where people have retired to finally live a peaceful life. Please look elsewhere. Sincerely, Frank and DeEtta Komarek
Sent from Huawei Mobile



"HAMET"

debbie koscielecki <dkdsusan@gmail.com>

Tue, Nov 4, 2014 at 1:28 PM

To: rgfo_comments@blm.gov

TO WHOM IT MAY CONCERN,

AS RESIDENTS OF THE "NAVAJO MOUNTAIN MESA" SUBDIVISION IN TELLER COUNTY, WE HAVE SEVERAL CONCERNS REGARDING THE "HAMET" HELICOPTER TRAINING PROGRAM PROPOSED TO TAKE PLACE IN OUR AREA.

THE DRY CONDITIONS BEING A CONSTANT CONCERN, THERE COULD BE A POSSIBILITY OF A CRASH THAT COULD IGNITE THE DRY GRASSES AND PLANT LIFE, PUTTING US ONCE AGAIN, AMIDST A WILD FIRE.

ANOTHER CONCERN IS THE POSSIBILITY OF A FUEL/FLUID SPILL, RISKING THE CONTAMINATION OF PRECIOUS GROUND WATER.

THE NOISE GENERATED BY THE PRESENCE OF THE HELICOPTERS WOULD, NO DOUBT, INTRUDE ON OUR PEACE AND QUIET, WHICH IS ONE OF THE MANY REASONS WE CHOOSE TO LIVE AWAY FROM THE CITY.

OUR AREA WILDLIFE IS VERY PRECIOUS TO US, AND THEY WOULD CERTAINLY BE EFFECTED, AS WELL.

AS MENTIONED IN A NEWSPAPER ARTICLE, THESE HELICOPTERS OPERATE DIFFERENTLY IN HIGH ALTITUDES, WITH SOME OF THE CONSEQUENCES BEING "MUSHY CONTROLS" AND THAT THEY "CLAW THEIR WAY THROUGH THE THIN AIR". WITH SO MANY HOMES LOCATED IN THE TRAINING AREA, THE POSSIBILITY OF MECHANICAL FAILURE SEEMS LIKE A REAL THREAT.

LAST, BUT NOT LEAST, IN A STRUGGLING ECONOMY, THE HOUSING MARKET HAS YET TO RECOVER. IN THE EVENT THAT A HOME IN THE TRAINING AREA WERE TO BE LISTED FOR SALE, THE PRESENCE OF THE ONGOING TRAINING COULD CERTAINLY JEOPARDIZE THE PROPERTY VALUE.

THOUGH WE RECOGNIZE THAT TRAINING IS VERY IMPORTANT, WE QUESTION THE CHOICE OF SUCH POPULATED AREAS FOR THIS TRAINING AND HOPE THAT OUR CONCERNS ARE TAKEN SERIOUSLY.

THANK YOU,

HOMEOWNER/NAVAJO MOUNTAIN MESA/TELLER COUNTY



HAMET

Ride LAMBA <ridelamba@gmail.com>
To: rgfo_comments@blm.gov
Cc: Brian LeDoux <ridelamba@gmail.com>

Fri, Dec 19, 2014 at 9:29 PM

BLM Royal Gorge Field Office

3028 Main Street

Cañon City, CO 81212

Attn: Nancy Keohane

rgfo_comments@blm.gov

RE: HAMET

Dear BLM Royal Gorge Field Office,

The Lower Arkansas Mountain Bicycling Association (LAMBA) represents a significant group of trail users in the greater Royal Gorge region. We have reviewed the proposed HAMET information and have the following comments:

1. Landing zones 505, 506, 507, and 508 are at elevations of 6380, 6260, 6580, and 6480 respectively: These elevations appear to be easily re-created on the Fort Carson property in the vicinity of Wild Mountain, Timber Mountain, and Booth Mountain. Given the similar elevations of terrain within the Fort Carson property, we request that the BLM review the need for these landing zones that are in very close proximity to Cañon City and the desirable recreational areas of the Gold Belt Byway, Seep Springs, Dinosaur Flats, Red Canyon Park, Shelf Road, and Oil Well Flats.

2. Landing zones 501, 502, 503, and 504 are proposed for the Cooper Mountain area: In the 2009 Decision Record and Finding of No Significant Impact for the Garden Park and Shaws Park Travel Management Plan Environmental Assessment, bicycle use in the Cooper Mountain area was not allowed based on the desired future conditions (DFC) and management objectives (MOs) within the Cooper Mountain subunit which were listed as:

- Preserve the visual qualities of the subunit
- Enhance wildlife habitat
- Enhance recreational opportunities that would maintain the remote backcountry setting

LAMBA remains unsure as to why such allowed uses as hiking with an off-leash dog or riding a horse meet the DFC and MOs, while these DFC and MOs are no longer met when a trail user is on a bicycle. Given that the minor nuance between riding a horse and riding a bike is the difference between meeting and not meeting the DFC and MOs, we assume that riding in a helicopter would certainly not meet the DFC and MOs of the Cooper Mountain subunit. LAMBA would certainly be more open to a revised interpretation of the DFC and MOs of the Cooper Mountain subunit that would allow for both bicycle and helicopter use, but until that interpretation is completed, we ask that the BLM review how the HAMET proposal meets or does not meet the current interpretation of the DFC and MOs for the Cooper Mountain subunit.

3. We ask that the BLM review how the increased use of HAMET will impact users of adjacent BLM and City of Cañon City recreational areas. Trail users have experienced helicopter activities in close proximity (using landing zone 505), and while the initial observation is interesting and unusual, the prolonged exposure to these activities has certainly degraded the sought-after recreational experience. Any increase in HAMET activities will certainly continue to degrade user experiences in areas near proposed landing zones and associated flight paths.

4. The proposed HAMET activities appear to include an excessive amount of use: In light of other users adjacent to the proposed landing zones and flight paths, we also ask that the BLM consider the volume of helicopter use that would occur and the frequency at which this use would negatively impact other users. The BLM should consider significant mitigation efforts should the proposed HAMET project be approved including a reduction in the amount of use, restricted seasons of use, monitoring of impacts to other users (with the ability to reduce use to adequately mitigate any excessive impacts), and the elimination of some landing zones as discussed in comment #1.

Thanks for your time and consideration.

Sincerely,

Brian LeDoux

Director – Lower Arkansas Mountain Bicycling Association.

Mr. Keith Berger, Field Manager
Nancy Keohane, NEPA Specialist
Bureau Land Management
3028 East Main Street
Canon City, CO 81212

Dear Mr. Berger and Ms. Keohane,

As with many other residents in the area of the proposed HAMET training zones, I am not opposed to training by our Armed Forces and I do understand that by necessity, there will be some overlap between military needs and civilian needs. That said, this entire process feels like an attempt to ignore needs of the residents in the proposed MTAs and landing zones as well as being a poorly conceived and implemented process. I don't understand how the various landing zones were picked, but for such a long term comprehensive program, it doesn't appear as if any thought was put into determining the best possible outcomes for both parties.

Just how were these landing sites determined? Why did anyone consider it appropriate to consider this frequency of landings? Insufficient attention has been paid to noise pollution. While the various helicopters may have minimal impact from their tracks on touchdown, the same cannot be said of the amount of noise generated when they pass overhead.

It is very disconcerting to learn that flying and landings will be allowed by organizations other than Ft. Carson. What procedures will be in place to determine who is flying? If there are problems with the flyovers, who will serve as a point of contact for residents, and who will be responsible for inappropriate behavior? Most of the helicopters will be unmarked, or so poorly marked as to be unrecognizable by residents. My house is in two landing zones. In the past I have been subjected to very low flyovers as well as helicopters circling over my house for no apparent reason. Their actions were unnecessary and were most likely "sightseeing" activities by the crews. These activities are extremely disruptive and generate an excessive amount of noise and vibration. Who do I speak with to address these issues in the future?

This is too much of a free-for-all for aviation activities. As these are training

missions, by definition, many of the pilots will be inexperienced. They should not be allowed in the more populated areas.

The landing zones 410 and 701 through 705 around the Lakemoor West and Navajo Mountain Mesa subdivisions should be eliminated entirely due to the number of residences as well as the ranching activities that occur in these areas.

Flying activities in all of the zones should be monitored as to who is flying and when. There should be a central point of contact for residents for when the inevitable problems occur. Will there be a methodology for compromise in the future if certain activities that occur have negative unanticipated consequences to the residents or will residents be forced to live with it for ten years?

To prevent congestion with inexperienced pilots and unnecessary safety issues, flights, times and zones should be controlled by a central authorization. It is not reasonable to have uncontrolled flyovers in a ranching valley.

The lack of emergency management planning that was apparent at the meeting in Cripple Creek was concerning. While it may no longer be Ft. Carson's problem when crashes occur, it is certainly a problem for the rest of us who live here. There has been no discussion of right of way issues and access to BLM properties where no roads exist. Is the consensus that there will be no permission required to cross private property? What happens if there is a non-crash, non-emergency landing and the owner of the aircraft has no access via roads to their equipment? What will the protocol be?

In general, the BLM needs to consider the human, animal, and overall lifestyle impacts to the residents prior to approving this plan or any modified version of it. This appears to be a takeover of BLM land by the military. I have to wonder what happened to the use of Forest Service land by the military and why that use was rescinded. Have those problems, whatever they are, been addressed in this proposal?

Finally, I am concerned about the BLM and Ft. Carson trying to slip this project through without adequate public input. While you have represented that this is a recent occurrence, I do question that assertion. Our property

is less than a thousand feet from Landing Zone 704 which is not accessible by road. A couple of years ago (and I'm sorry I can't be more specific other than it was during the summer), a woman from the BLM requested permission to cross our land in order to visually verify that there were no power lines running through the BLM property behind our house and she could not take our word for it. While my husband and I considered that to be odd at the time, I now strongly question if that wasn't leading up to this very process. It would have been more honest to say that Ft. Carson was considering asking permission for landings and I find the lack of transparency disconcerting.

Please give strong consideration to denying this process as it stands.

Thank you,

Stephanie Landsittel
5254 High Park Rd.



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET study

Peg Larson <widowlarson@gmail.com>
To: RGFO_Comments@blm.gov

Wed, Jan 21, 2015 at 10:56 PM

To Nancy Keohane

From Peg Larson and Steve Lukassen

We live very close to the Baldy Peak landing site and are concerned about the proposed project. We have talked with you by phone, but wanted to be sure you had our email for the HAMET contact list.

Thank You



HAMET

Ginger Lengacher <glengacher@msn.com>
To: rgfo_comments@blm.gov

Thu, Dec 18, 2014 at 3:53 AM

Ginger Lengacher
13729 County Road 102
Guffey, Colorado
glengacher@msn.com
719-689-0888
December 18, 2014

Hello Ms. Keohane,
NO to the proposed High Altitude Training Program called HAMET.
This is a huge encroachment on my quiet and peaceful life, the safety and lives of all animals, both domestic and wild. Has there been a proper procedure followed for an Environmental Survey for HAMET Training ?
Sincerely,
Ginger Lengacher



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

Lawrence LePage <lpage@wildblue.net>
To: rgfo_comments@blm.gov

Wed, Dec 3, 2014 at 1:03 PM

I support these training activities by the Fort Carson aviation brigade. I would expect the BLM to grant approval as the only inconvenience would be intermittent noise pollution.

Lawrence LePage
Guffey, CO

Four Mile Regional Planning Committee Response to High Altitude Mountain Environment Training (HAMET) Plan of Development

Submitted by:

Mark Gregory Liverman
Four Mile Regional Planning Committee
9915 County Rd 1
Florissant, CO 80816

liverman@att.net

Revision Date: 14 December 2014

Introduction & Executive Summary

The Four Mile Regional Planning Committee believes that the use of all of HAMET MTA 7 and certain landing zones in MTA 4 is inappropriate for reasons of public safety, economic impact, environmental impact, impacts to the public infrastructure outside of BLM lands, and the quality of life of the residents of and visitors to the Four Mile region.

Due to these impacts, all the landing zones in MTA 7 and LZ 401-404 and LZ 410 should be removed from the HAMET Plan of Development and, if necessary, alternate sites identified in more remote areas. We ask that flights approaching or departing other MTAs and LZs be restricted to a minimum altitude of 1000 ft. above terrain or items of value while above the Four Mile Planning area.

While this is not in our planning area, we recommend that LZ 407, 408, 409 be carefully considered for removal or restrictions due to their proximity to residences and active ranches.

The remainder of the document will provide background as to our involvement in this process as well as the detailed arguments for each of the impact areas mentioned in this section.

The citizens of Four Mile recognize training flights at high altitude are necessary to prepare our military flight crews to conduct safe military operations when deployed in service to the United States. We recognize that the high incidence of rotor wing aircraft incidents in theaters of operation abroad have been traced back to insufficient practice and certification in high altitude flight operations. We support the use of public lands, such as BLM managed lands, for this purpose, especially in contrast to permanent acquisition of private lands through eminent domain and purchase. We are merely pointing out that some of the LZ in the HAMET POR are not appropriate for this training and urge alternate sites

be selected, including new sites in BLM properties more removed from residential and ranching locations.

Four Mile Regional Planning Committee & Four Mile Regional Action Plan

The Four Mile Regional Planning Committee (4MRPC) was organized twenty years ago to develop a Regional Action Plan as defined in the Teller County Land Use Regulations and the [Teller County Growth Management Plan](#). After the [Four Mile Regional Action Plan](#) was adopted by the Teller County Board of County Commissioners on 27 March 1997 as Resolution No. 3/27/97(27A), the 4MRPC has continued to provide input to the Board of County Commissioners and the Teller County Planning Commission on planning, zoning and land use issues in the Four Mile region and Teller County.

The Four Mile Region is defined in the Four Mile Regional Action Plan. It covers the southwestern portion of Teller County. There are two HAMET Mountain Training Areas within the Four Mile Planning area:

- MTA-7 (LZ 701-706)
- the portion of MTA-4 that is within Teller County (LZ 401-404 and 410)

The essence of the Four Mile Regional Action Plan is captured in the opening vision statement:

Our vision consists of a rural lifestyle community characterized by low density residential property interspersed with large existing family ranches. The area is visually unobstructed by housing, lighting and signs to allow appreciation of the magnificent views, abundant wildlife, natural vegetation and spectacular night sky. The rural atmosphere is enhanced by low to moderate speed limits on area roads. Local telephone and electrical service is provided by underground wiring wherever possible.

Businesses with a history of operation at a specific location will continue to operate; however, there will be no further commercial development in the planning region. Many area residents will pursue business opportunities from their homes as "Home Occupations".

As stewards of the land, residents and property owners of the area wish to maintain the land in a natural state. We share a strong feeling of community and a deeply held belief that its specific rural lifestyle is an important value and objective.

Documentation References

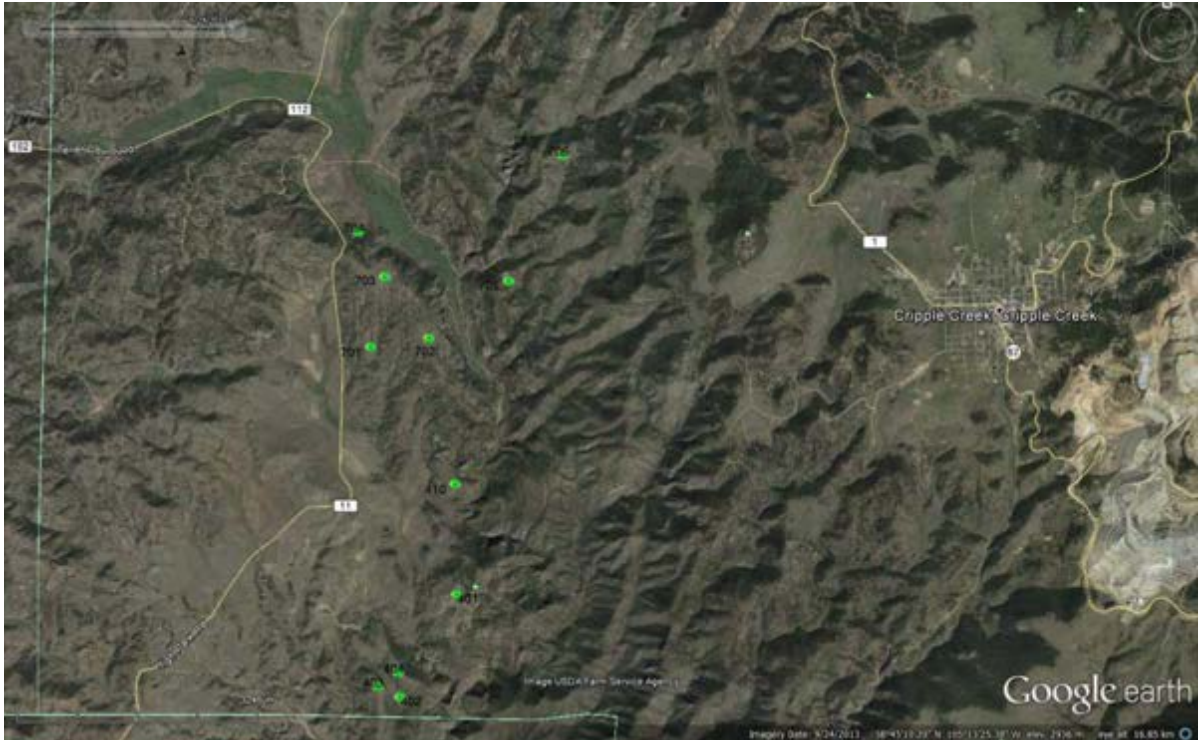
We downloaded and studied the documents available on the BLM High Altitude Mountain Environment Training NEPA website (<http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>) as of 2 December 2014:

Casual Use Letter.pdf
Exhibit 3 - Aircraft.pdf
Exhibit_1_-_Area_of_activity.pdf
Exhibit_2_-_Helicopter_Landing_Zones.pdf
Exhibit_4_-_Noise_Study.pdf
Ft Carson HAMET 2014 BLM_Colorado_Ownership_KMZ_20141029.zip
Ft Carson HAMET 2014 Proposed_Landing_Zones.zip
HAMET Proposal Map 1.pdf
HAMET Proposal Map 2.pdf
PLAN OF DEVELOPMENT 9.3.2013.pdf
PR HAMET EA Scoping 9.29.14.pdf
PR HAMET EA Scoping extended 11.19.14 FINAL.pdf

Intensity of Use Given in the HAMET POR

The HAMET POR states the conditions for which the Ft. Carson Combat Aviation Brigade wishes to be given approval. While language in the POR implies that the HAMET operations will not always be at this maximum, nowhere does the POR commit and obligate the CAB to operate HAMET at less than the maximum levels stated in the POR:

- Areas
 - While landing zones appear from map coordinates to lie within the BLM boundaries, many of them are on or near the edge of the BLM boundaries
 - The **Mountain Training Areas include private land**. The following subdivisions are wholly or partially contained within MTA 7 and MTA 4:
 - Lakemoor West (Lakemoor Dr) – wholly contained with MTAs
 - Navajo Mountain Mesa
 - Bear Trap
 - Numerous individual properties along Teller County Rd 11

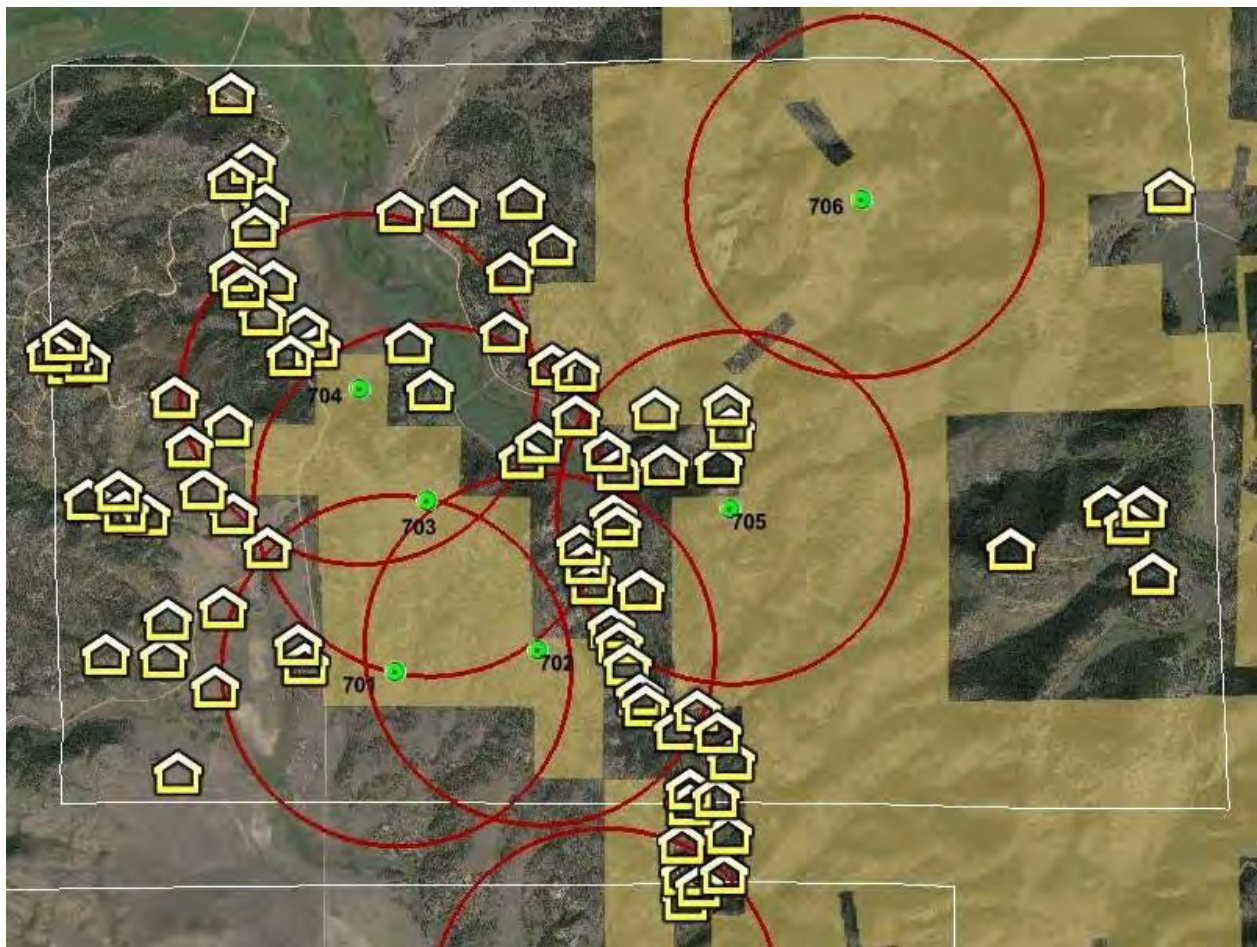


The two pictures above show the landing zones in Teller County as green dots. It was produced on Google Earth using the KML file supplied on the BLM website. The Lakemoor West subdivision is in the green valley in the middle of the MTA 7 landing zones. The Bear Trap and Navajo Mountain Mesa subdivisions are on the west side of CR-11 from the landing zones. Dwellings and access roads are clearly

visible using this recent (2013 imagery). The scale at the bottom left of the map can be used to verify the proximity of homes and ranches to the landing zones. The areal imagery on Google Maps or Google Earth can be used to zoom in and clearly see the close proximity of ranches and homes to the prosed landing zones in this area.

Note: These images may not be very clear when printed. If that is the case, please view this file on a monitor or use the KML files from the BLM website to reproduce these maps on Google Earth. Be sure to use the most recent imagery.

This next image, produced by Mr. KC Jones ([kcj@ccvnet.net](mailto:kcyj@ccvnet.net)), shows dwellings. They are identified as house icons. The boundaries of MTA 7 are in white and the red circles show a 1000 m radius from the landing zone. Low level flight operations are requested within the MTA and contour and NOE flight operations are requested within the red circles. It is quite easy to see the large number of dwellings that are within the MTA and the 1000 m LZ radius from this image.



Mr. Jones has constructed several other maps which have been sent to the BLM in November. Please let us know if these should be re-sent.

- Frequency
 - 1400 operations (landing & take-off) per LZ per year (3.9 every day for 365 days) [Sec 3.c.2, p. 6]

- Operational Hours
 - 24 hours, day or night are allowed, with the majority expected, but not numerically committed to be between 1400 and 2200 hours local time [Sec 3.d, p. 7]
- Flight Paths
 - No stated restrictions as to flight paths into, out of or within the MTA and LZ [Sec 3.f, p.7-8]. This means flights could pass directly over houses, barns, ranches, etc. at the altitudes indicated in the POR
- Flight Height
 - 500 ft. AGL outside MTA [Sec 3.f, p.8].
 - 200 ft. AGL while flying between LZ within a MTA [Sec 3.g, p. 8]
 - Contour flying (25-80 ft. AGL) within 1km of a LZ (no language restricts this to being within the MTA [Sec 3.g, p. 9]
 - NOE flight (0-25 ft. AGL) within 1km of a LZ (no language restricts this to being within the MTA [Sec 3.g, p. 9]
- Noise [Sec. 3.e, p. 7]

Not every aircraft is listed here. The largest aircraft, the Seahawk, is not mentioned in the table. The distances of 200 and 500 ft. are the distance above homes, residences, animal pens, etc., that an aircraft would be allowed to fly inside and outside an MTA if the POR was adopted as written:

 - Up to 92 dBA within 200 ft. – equivalent to a gasoline mower at 3 ft.
 - Up to 84 dBA within 500 ft. – equivalent to a diesel locomotive at 45 mph at 100 ft.

For comparison, the rural nighttime noise level is 30 dBA or less.

References for the comparisons:

http://www.airportsites.net/lambert-stl/workshop2/nc_32.aspx

<https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm>

Detailed Analysis

Since there is no language in the POR that compromises the maximum level of use, for the purposes of our analysis we must assume that operations will be at the maximum levels specified in the POR.

This means we can expect almost 4 operations per day in each landing zone or 44 operations per day in the Four Mile area, directly impacting the neighborhoods of Lakemoor West, Navajo Mountain Mesa and Bear Trap in low lev (these are within the MTAs) flight operations and subjecting the residents to noise levels of up to 84 dBA as the craft fly overhead.

Hardest hit will be the Lakemoor West subdivision which is in the middle of MTA 7 and surrounded by seven LZ (701-706 plus 410). Under the POR, the pilots would be allowed to fly contour and NOE patterns through the subdivision since the subdivision is within 1000 m of several of the MTA 7 landing zones. The images earlier in this report clearly show how many dwellings are in the area.

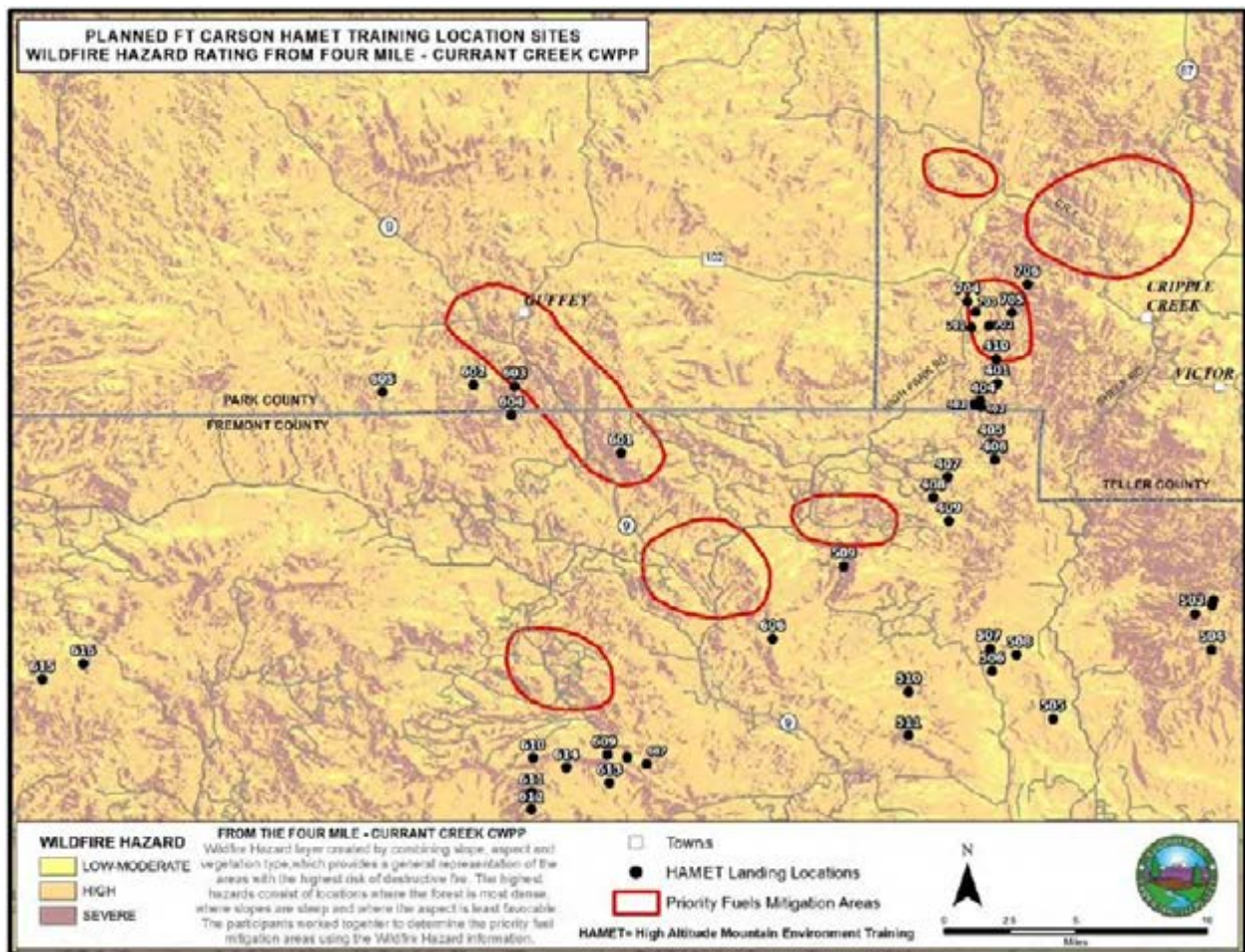
Since the Casual Use letter of 1 May 2013 exempted some landing zones from use, the operations per day at the remaining sites would need to exceed 3.9 per LZ per day in order to achieve the tenant and non-tenant mission objectives. In other words, the impacts could be worse.

Public Safety

During flight operations, accidents happen. Low level flights increase the probability of accidents. Since ranches and residences are within the area allowed for low level flight operations (within 1000 m, within an MTA), there is a distinct probability of a collision with a dwelling or barn, potentially resulting in injury or loss of life.

When an aircraft impacts the earth, fire is a real possibility. The grasses, shrubs and trees in the Four Mile area have a very low moisture content. A crash involving a fire has the very real possibility of turning into a dangerous wildfire that could destroy property and life before it is contained.

The following map, created by the Coalition for the Upper South Platte and included in the [Four Mile - Currant Creek \(FMCC\) Community Wildfire Protection Plan \(June 2013\)](#) was enhanced by Mr. KC Jones (kcj@ccvnet.net) to show the location of the proposed landing zones. Almost all the MTA 7 landing zones are within an area of high to severe fire danger and are earmarked for Priority Fuels Mitigation due to the density of fuels and the risk to life and property. It does not make sense to risk an accidental wildfire in these areas. Other, less fire-prone sites should be identified and used for HAMET.



The landing zones in Teller County are quite close to County Road 11. This road is heavily traveled by casino patrons traveling to and from Fremont and Pueblo counties as well as employees commuting to work in Cripple Creek. The road is dangerous due to blind curves and steep grades along the route. The

Four Mile Fire Chief has predicted an increase in traffic accidents due to drivers who are distracted by the spectacle of tens of helicopters per day arriving and departing from the MTA 7 and MTA 4 landing zones.

Economic

The accidents mentioned in the previous section are not only a personal safety, but an economic risk. People who lose their home may have trouble working and risk loss of income. There are several working ranches in the area whose income would be directly shut down in the event of a wildfire.

Cattle and other domestic livestock are sensitive to environmental disruptions. Bovine reproduction and lactation processes are negatively impacted when cattle are startled.¹ Failure to produce healthy calves directly and negatively impacts the ranching industry in southern Teller County.

Based on data obtained from the Colorado Dept. of Labor and Employment² for the second quarter 2014, over 18%³ of workers in Teller County are employed by two of Teller County's largest employers: the Cripple Creek Victor Gold Mine or the Cripple Creek casinos. These are 24x7 industries. At any time during the 24-hour day, workers would be asleep, including during the hours when the majority of flights are projected to occur. Workers who live in the residential areas within MTA 4 and MTA 7 would be subject to sleep interruption and the inevitable decline in job performance.

A person's home is often their biggest savings account, our biggest "IRA". Many of us plan, at some point in our lives, to sell our current home and use the proceeds to sustain us in our senior years. Properties which are in the middle of a training area where up to 44 flights per day are occurring will not have nearly the appeal as the same home in a quiet rural area. Property values in the affected area are bound to suffer a downturn.

Environmental

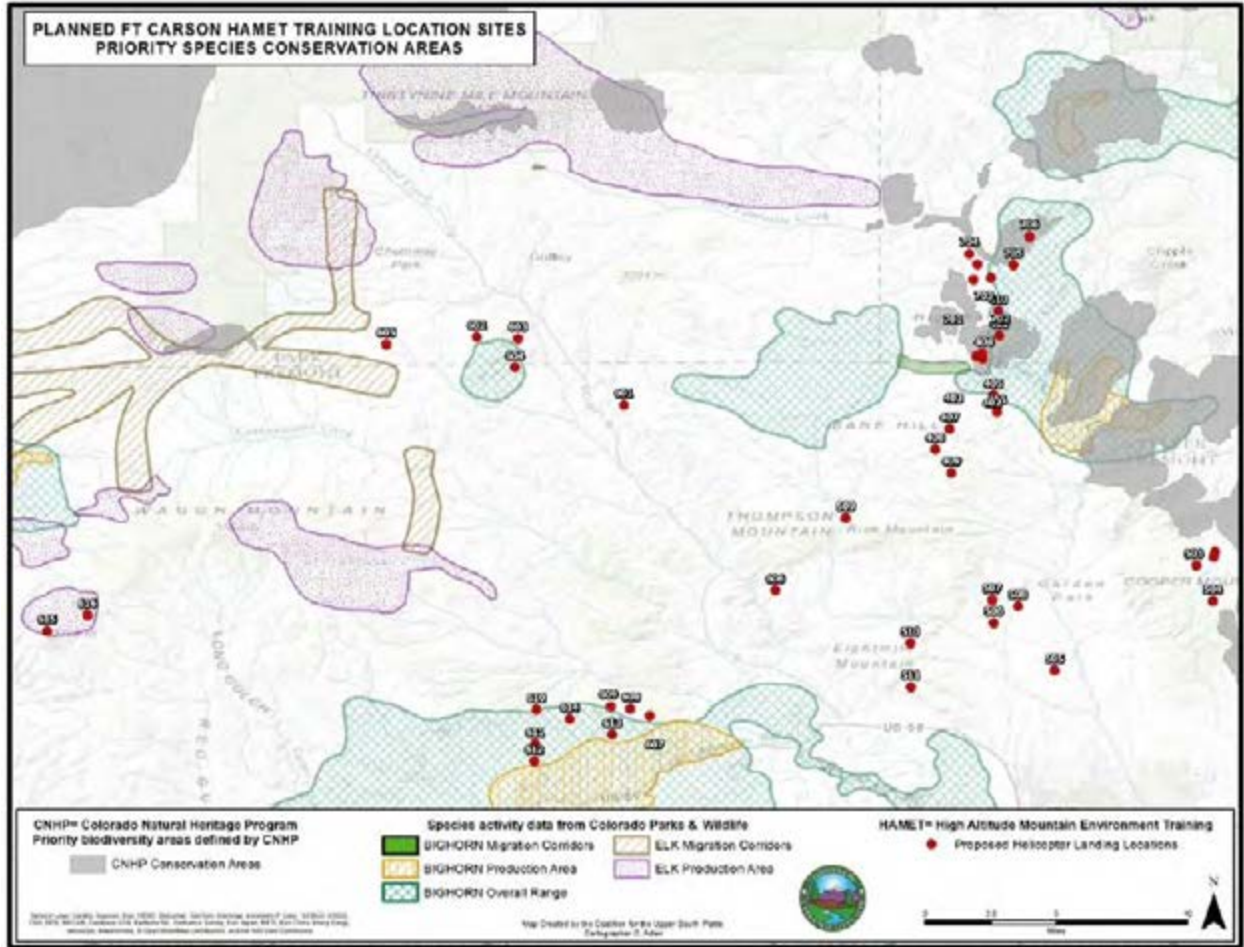
Disturbances to reproduction and lactation in wildlife such as deer and elk due to noise have also been found. In fact, the Casual Use letter stipulated that the military would cease operations in an area where domestic livestock or wildlife was detected. The problem is that the wildlife have already been disturbed to some extent when they are detected.

The following image uses an image created by the Coalition for the Upper South Platte showing species data from the Colorado DOW. KC Jones placed the landing zone icons on this map to indicate the close proximity of MTA 7 and MTA 4 landing zones to CNHP Preservation areas and Rocky Mountain Bighorn Sheep range.

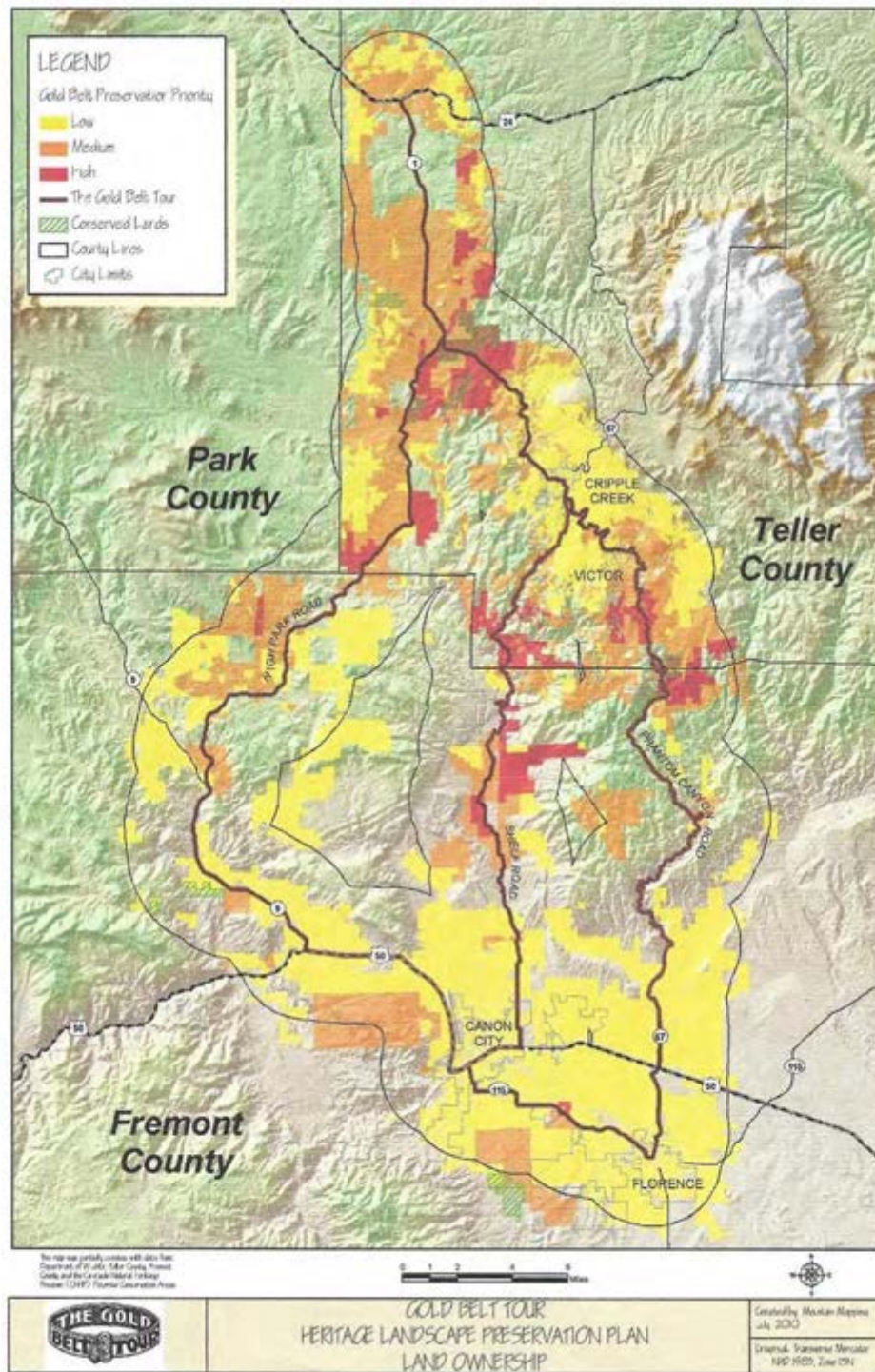
¹ Conversation with lifelong cattle rancher Howard Stone (Stone Ranch, Florissant, Colorado)

² See <https://www.colmigateway.com/gsipub/index.asp?docid=372>. Data for the CCV Mine was obtained from the [CCV Mine website](#): "CC&V currently has increased its employment to 550 employees, up from 500 at the end of 2013." These were added to the data from the State of Colorado.

³ This number does not include workers at the casinos who are coded as food, beverage or accommodation workers. The aggregate number of shift workers in Teller County is conservatively estimated to be well in excess of 20%



The area in the Four Mile region is rich in wildlife. A formal assessment of wildlife, scenic, historic, cultural and other items of value worthy of preservation and conservation was part of a study conducted by the Gold Belt Tour Scenic and Historic Byway. The aggregate preservations priorities are depicted on the following map.



More detailed studies and updated information may be obtained from the Gold Belt Tour Scenic and Historic Byway office:

- Gold Belt Tour National Scenic Byway Heritage Landscape Preservation Plan 2007
- Gold Belt Tour Scenic and Historic Byway Wayfinding Plan 2007

- Gold Belt Tour Scenic Byway Partnership Plan 1997 & ongoing updates
- Recent preservation inventories and GIS surveys, 2012-2014

The Gold Belt Scenic Byway crisscrosses much of the area between Florissant, Cripple Creek, Victor and Canon City. The route follows Teller/Fremont CR-11 (High Park Road), SH-9, US-50, the Shelf Road and the Phantom Canyon Road (SH-67). The Byway is dedicated to preserving scenic, historic and cultural values along the route for the enjoyment of residents and visitors. It promotes ecologically sound tourism and thereby enables and supports the economy in both Teller and Fremont counties. Visitors will not be so eager to drive the byway, enjoy its wonders and patronize the various business in the area if their enjoyment is spoiled by frequent low level overflights of noisy military aircraft. People come to enjoy the peace, solitude, the vistas and the wildlife, not to witness an airshow.

Preservation of land with conservation value is a high priority of the residents in southwestern Teller County as evidenced by the fact that almost every large piece of property along CR-11 in Teller County and the northern edge of Fremont County has been placed in a conservation easement. This means that specific conservation values inherent in the land must be identified, documented and placed in trust to an organization who will preserve them in perpetuity. To quote the [Palmer Land Trust](#):

A conservation easement is a binding legal agreement made between a landowner and a qualified conservation organization (i.e. Palmer Land Trust) that protects lands with important conservation values, which provide public benefit. The Internal Revenue Code (“IRC”) delineates that an easement protect one or more of the following conservation values: public recreation/education, natural wildlife habitat, open space, or historic preservation. In many cases, agricultural properties possess open space and natural habitat.

There are additional properties that are so preserved along the Shelf road, east of MTA 4 and MTA 7. Along both CR-11 and the Shelf Road we counted nine large parcels with easements, easement projects underway or which are in the early planning stages. Many more are within the vicinity and would be overflowed on approach or departure to the MTAs in Teller County and northern Fremont County. Many of these conservation easements call out the scenic open space views as specific values which are being conserved. Low level overflights of these private lands at 500 or 200 feet ASL or lower are incompatible with these specific conservation values.

There is also the direct environmental impact of the landings themselves. Impact to the ground will result in ruts that can lead to erosion after the torrential rains we typically experience during the late summer months.

Public Infrastructure

As started in the POR and during the public meeting in Cripple Creek, response to any helicopter accidents or subsequent wildfires is the responsibility of the local county authorities. The POR does not adequately address the notification, coordination and training of the local fire, EMS and law enforcement agencies. Even though the landing zone is on BLM property, the overflights to and from the landing zone and some of the low level flight operations, including contour and NOE flight operations

will occur over private property outside BLM jurisdiction. Any downed aircraft, whether or not it occurred on BLM administered lands, would be responded to first by local fire, EMS and law enforcement, most of whom are not primarily trained, staffed or equipped for accidents of this nature.

Regardless of where the landing zones are located, county level first responders should be given additional training and equipment. They must be included in notifications about the scheduling of flight operations so they can be on alert and prepared.

Critically ill patients in our rural area are routinely transported to major hospitals by air ambulance choppers. Some planning must be given to ensuring the air space is clear of military training flights when a Flight for Life chopper is operating in the area.

Quality of Life

As our Four Mile Plan states, “We share a strong feeling of community and a deeply held belief that its specific rural lifestyle is an important value and objective.” The public lands within our community were not envisioned as military training grounds. This is not the quality of life we value and the quality of life that is written into the Teller County Master Plan.

Conclusion

We are not asking the Army to stop training. We are not asking the BLM to prevent the military from using public lands.

We do, however, believe that these specific landing zones and Mountain Training Areas are not suitable for the purpose due to conflicts with residences and ranches within the MTA and in the immediate vicinity of the landing zones.

To quote the HAMET POR, “Fort Carson would prefer to avoid areas of concern where resource values or other public land users are identified or foreseeable” [Sec 5.a, p. 10]

We believe we have identified resource values in the area of MTA 7 and MTA 4 that warrant all MTA 7 sites and at least sites 401-404 and 410 in MTA 4 being removed from the proposal and a restriction on overflights on approach and return to keep them away from the populated areas in Teller County.

Please help us preserve the values we cherish.



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET study

Peg Larson <widowlarson@gmail.com>
To: RGFO_Comments@blm.gov

Wed, Jan 21, 2015 at 10:56 PM

To Nancy Keohane

From Peg Larson and Steve Lukassen

We live very close to the Baldy Peak landing site and are concerned about the proposed project. We have talked with you by phone, but wanted to be sure you had our email for the HAMET contact list.

Thank You

RICHARD G. MANDEL

Attorney at Law

171 Stream Drive . Guffey, Colorado 80820 . Phone/fax 719-479-2209/479-2295

e-mail: 57TR3@RIS.NET

December 19, 2014

Ms. Nancy Keohane
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Cañon City, Colorado 81212

Re: Comments on Review of Plan for Development of HAMET in Guffey Area

Dear Nancy,

Thank you for taking the time to meet with me last week.

My initial concerns are based on the intensity of the proposed use, as calculated from my review of the “PLAN OF DEVELOPMENT HIGH ALTITUDE MOUNTAIN ENVIRONMENT TRAINING”, prepared by Fort Carson and the U.S. Army Corps of Engineers, Omaha District.

The following are excerpts from the Plan regarding usage of the proposed Landing Zones:

“Section 3(c) Frequencies of Sorties: Fort Carson breaks down the type of training for the purpose of understanding the frequency and duration of aviation training. Events will be either Home Station (Tenant unit) Training or Non-tenant (Rotational unit) Training.”

1) Home Station Training:

“. . . it is not feasible to accurately estimate the maximum usage by Home Station Units, but the *minimum intensity* of use related to Home Station Units would be defined by the following equation: 2 landings x 350 aviators = 700 landings / 43 LZs = **16.25 landings per year, per LZ.**”

2) Non-tenant training:

“Theoretically, the *maximum number* of landings per year for Non-Tenant units would be defined by the following equation: 8 landings a day x 90 days = 720 landings per LZ x 2 Combat Aviation Brigade rotations = **1440 landings per year, per LZ.**”

Direct Impact Concerns:

Aggregating these projections, a reasonable approximation of the number of landings could easily exceed 1500 landings **per year per landing zone**. Even with use of only 25% of the 43 landing zones that would be over 16,000 landings per year; with the potential for 50,000 landings per year.

Whether people live near the actual LZs or not is only part of the impact to be considered. In addition to the landings, all of the over flights, approaches, departures and low altitude training activities at and around the LZs add dramatically to the intensity of the impact to our area. The impact review should not be limited to the LZs; but should include, but not be limited to, the entire flight path for each flight as well as all of the low altitude training that is an integral part of this activity.

I also question the propriety of considering the approval of this level of military training use of the Public Lands adjacent to residential land occupancy. We live, work, keep livestock, ride our horses, hike and fish on the private lands adjacent to the Public Lands under consideration. What level of intrusion on our private lands will be permitted by the proposed use of the Public Lands? We did not buy, improve and choose to live in these remote, rural areas expecting to find ourselves effectively adjacent to Fort Carson.

Medical Services:

Medical services in the Guffey area rely on “Flight for Life” for Paramedic level Emergency Medical Services. The land based ambulance services offer only EMT level service. Additionally, the difference in transportation time and potentially, the survivability of an accident or medical emergency, is significant if “Flight for Life” is not available during any medical emergency. It is my understanding that during training operations a “no fly zone” will exist for an unspecified time and area. Local EMS will not be notified of the location or duration of such “no fly zones” and will therefore not be able to plan effective alternatives (if any exist) to provide emergency assistance. If “Flight for Life” cannot get to us, we will not have access to these vital Medical Services. How has the BLM evaluated the potential life threatening impact on the residents in this area arising from this loss of the Medical Services that are presently available to the residents in our District.

Wildlife Impacts:

I add my voice to those who question how it would be possible for the proposed Plan of Development not to have a dramatic and perhaps permanent impact on the wildlife that the BLM is charged with protecting for the public.

Increased Potential Wildfire Firefighting Issues:

I would like to think that we could learn from past experiences, like the Hayman Fire in 2008. A forestry technician with the U.S. Forest Service set a fire in a campfire ring. The fire quickly spread out of the campfire ring and eventually torched over 138,000 acres and burned across four different counties. The fire she ignited resulted directly in the death of one civilian, \$39.1 million in suppression costs, the destruction of 133 homes with total private property losses valued at \$40.4 million, and indirectly led to the death of five firefighters. Several insurance companies filed a \$7 million suit against the government in the fall of 2008.

The location of the Hayman Fire was significantly closer to all levels of Firefighting and Emergency Services. The source of the fire was a piece of paper burning in a prescribed campfire ring. The proposed increased HAMET activities will bring Helicopters comprised of thousands of pounds of flying magnesium carrying aviation grade fuels to remote locations with no reasonable access to Firefighting or other EMS services. Should a crash occur, I believe the optimal response time for Federal Firefighters is more than an hour from Canon City to the LZs West and South of Guffey. It is more likely, in my opinion that due to the lack of any reasonable road access to the remote locations proposed, two or more hours could elapse prior to the commencement of Firefighting activities.

If our local Volunteers from the SPCFPD are called upon, they may be able to respond more rapidly but they have very limited manpower and equipment. If they should be called upon, our District could then be left without any Firefighting or even basic EMS services during that time.

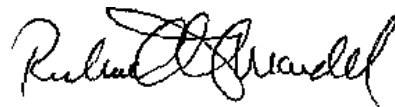
Considerations for Alternative HAMET Sites:

I propose that the Development Plan be revised to focus on two additional parameters in determining where on other BLM land this important training take place. Such a revised Plan should then be submitted to the BLM for its review:

1. Locate and consider training sites on Fort Carson and other Military Bases which fulfill most, if not all, of the needed training parameters on existing military lands where a large volume of the training can take place with a minimum intrusion on the Public's private property rights and there can be far greater access to Firefighting and Emergency Services should there be an accident, and;
2. Identify and consider more remote HAMET sites on BLM property, such as the areas West of Black Mountain, here in Park County. Though the use of such sites may exacerbate the problems of difficult access for Firefighting services should there be an accident, the trade off in minimizing the impact and risks to Private property would be appropriate as would the reduction in the numerous other anticipated impacts to the Public by moving the LZs farther from existing recreational and residential uses.

Thank you again for considering these comments as well as those of my friends and neighbors who I believe share many of my concerns. With best wishes for a happy and healthy holiday season, I remain,

Very truly yours,



Richard G. Mandel, Esq.



A response to your proposal

MARK J <northlandfi@msn.com>
To: rgfo_comments@blm.gov

Sun, Dec 7, 2014 at 8:41 PM

RGFO,

I live in very close proximity to 31 Mile Mountain. I am fully behind training our military to train for mountainous and high altitude assignments. However, your proposal will affect hundreds of households and thousands of individuals around the 31 mile area. We have a lot of horses and cattle up here and you may not have an understanding of how unfamiliar noises and objects affect livestock but I do. I know they will run and ranchers will be affected by possible weight loss or animal loss. Lower flights will also have a negative affect on both elk and deer populations. The proposal will drive these animals from what they thought were protected areas for them to live in to areas that present more of a threat from people, dogs, roads and highways. If the animals leave here the whole ecosystem changes.

I'm not sure what the length of time the government has set aside for this training but a trial period of 30 to 60 days and a meeting or some type of communication with the affected public afterward makes sense to me. There might be ramifications from this that you and the affected public my not have considered. I know most of us that live in the mountains live hear because we wanted to get away from the type of thing that is now being presented to us. There are millions of acres of land in CO that have few if any inhabitants but can still deliver what the military is looking for. Now you may say these sights are convenient but convenient to whom.

I love our military, who they are and what they do for America. What I don't care for is being a hard working, law abiding, tax payer (1 of the 41% who actually pay taxes) who has worked hard to forge out a living in the mountains and forgone some of the benefits of city life to enjoy our livestock, wild life, fresh air and quiet mountain views only to have my wonderful government threaten what we've worked so hard for.

I'd prefer not to have any of my personal information released.

Thanks for listening.

M



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

High Altitude Mountain Environment Training (HAMET) / Fremont County

Bob <hocoseba@gmail.com>

Thu, Dec 4, 2014 at 7:47 PM

To: rgfo_comments@blm.gov

We purchased our beautiful mountain property in Fremont County for its beauty, serenity and tranquility. As such, we do not approve of the noise that helicopter training would bring to the area. While we recognize the importance of being able to train in mountainous terrain, there are plenty of less populous mountainous areas in the U.S. that accommodate helicopter training and some of these are certainly more . If our troops are to obtain the best possible training, it's better accomplished elsewhere.

Sincerely,
Robert Mars

Attn. HAMET
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO 81212
rgfo_comments@blm.gov

On behalf of Worsham + Loos we appreciate the opportunity to comment on the High Altitude Mountain Environmental Training (HAMET) for the Combat Aviation Brigade stationed at Fort Carson, CO. We would urge your agency to give positive consideration and ultimate approval to this very important expansion of the Fort Carson training mission

The purpose of HAMET is to provide helicopter pilots the experience and skills required to operate aircraft safely at high altitude in mountainous terrain prior to deploying to areas with high elevations and rugged topography. Fort Carson is the preferred site for this type of aviation training, which is conducted by units deploying to mountainous regions in support of the Global War on Terrorism. This training is imperative for combat deployments to mountainous regions because it prepares aviators to operate at high altitudes where there is less power available to conduct maneuvers such as takeoff and landings.

The use of public land in Fremont, Park, and Teller Counties is necessary to ensure the HAMET program exposes pilots to a wide variety of situations and challenges. The HAMET program utilizes 16 landing zones on public land through a special use permit issued by the Forest Service. These LZs are not adequate to meet the need for a variety of locations, and limiting HAMET activities to the Forest Service LZs could result in a higher rate of use than is desired by the Army, the Forest Service, and the public.

Therefore, the need of the Army is for the Bureau of Land Management to issue a right-of-way grant (ROW) to allow Fort Carson access to certain public land, as described in Section 2 below, to provide an additional 43 LZs for the HAMET program (approximately 234.676 Acres)."

The primary user of HAMET would be three different units stationed at Fort Carson - The 4th Combat Aviation Brigade (CAB), the 1-25 Attack Reconnaissance Battalion and the 11th Aviation Regiment (US Army Reserves). Every aviator in those units would receive Mountain Qualification training through this program. In addition, as the Army considers future stationing needs, to include a potential BRAC, one of the strengths of Fort Carson is its unique high altitude location. There is no other location where this type of training is occurring.

Beside the significant economic impact, the Fort Carson based helicopters have been critical in recent years in fighting wildland fires, not just in Colorado Springs, but also at locations like the Royal Gorge fire

in Fremont County, and have provided critical evacuations in other disasters such as flooding and assisting with livestock operations in blizzard conditions.

The Federal Land Policy and Management Act (FLPMA) directs public lands to be used for "multiple use and sustained yield". One of the allowed uses is that by other federal agencies, to include administrative processes such as that being followed in the case of the HAMET application.

The Army is not seeking to have the lands permanently set aside, rather they seek the ability to make temporary use within the conditions established by the application. Therefore these lands are meeting the multiple use direction as the public will continue to have access to these lands outside of each specific training event.

We thank you for the opportunity to comment on this important program for our region and our national security. Please do not hesitate to contact me directly for questions and comments about our position.

Sincerely,

Kathleen J Flood

KATHLEEN J. FLOOD

555 COUNTY RD 781

WOODLAND PARK, CO 80863

719-338-4792

Teller County



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Military Training in Cripple Creek, CO

DAN MCCRAW <danmccraw@sbcglobal.net>

Thu, Dec 11, 2014 at 8:02 PM

Reply-To: DAN MCCRAW <danmccraw@sbcglobal.net>

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Hi, I'm Dan in Cripple Creek, Colorado. I'm very concerned about the military training in Cripple Creek, the problem is the helicopters flying so low, looking in on us. Making it also sound like a warzone, very loud. I am an older person and I'm disabled and when I see all this training out here, that's already going on, it makes me feel very uncomfortable, like I'm going to be attacked. Please do not let Cripple Creek become a military training zone, it is unacceptable.

Dan McCraw

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PO Box 1792
Canon City, CO 81215-1792

Larry McGee, President
Joyce Converse, Vice-president
Kurt Rust, Secretary-Treasurer

Canyon Springs Ranch Owner's Association

December 9, 2014

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Field Office, Bureau of Land Management
3028 East Main Street
Canon City, CO 81212

Transmitted via email to: rgfo_comments@blm.gov

Dear Ms. Keohane:

We, the Board of Directors of the Canyon Springs Ranch Owners' Association (CSROA), are writing to you concerning the U.S. Army HAMET proposal.

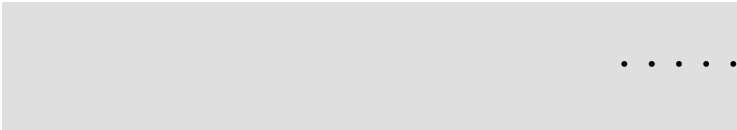
Canyon Springs Ranch (CSR) is the first subdivision located along either side of Tallahassee Rd. (FCR2) immediately west of CO Hwy. 9. It is comprised of 80 properties of at least 35 acres in size for a total land area of approximately 3,000 acres.

We only learned of the proposal on December 3, which did not provide adequate notification to attend the public meeting the next day. However, from viewing the presentations and other documents provided, it appears that proposed use of at least two of the training areas (6E and 6W) under the stated conditions could adversely affect our residents and non-resident landowners.

The Fort Carson presentation indicated that flights between MTA's would be flown at a minimum altitude of 500'. At this level, the noise generated by an Apache helicopter (AH-64), which may constitute the majority of the flights, is 83 dBA (approximately the sound of a passing diesel truck at 50'). According to the Fort Carson noise study, 65 dBA (approximately the noise of an AC unit at 100') is the noise level likely to be annoying to the least number of people (<1%). To achieve this level, an AH-64 would need to be 1000' above-ground-level and ½-mile ground-track-distance from the listener.

The proposal also indicates that it is long-term and intends an exponential increase over the current infrequent flights with those flights occurring both day and night. The increased frequency of the flights and the possible noise level generated by them can only be considered noise pollution. Many of the residents in our association have built homes in this area to escape the noise of more populated areas. Both resident and non-resident landowners will be adversely affected by the effect of the noise on animal life and by the possible decrease in property values (an economic consequence to both the landowner and the county's tax base) caused by the pollution.

While we fully realize the Army's need for training in a mountainous environment and support its efforts, we believe that the current proposal and its implementation are flawed. However, two actions may serve to ameliorate the current condition:



• • • • •


December 9, 2014

Page 2

- Extend the time for comments and ensure that adequate notification is provided to all affected citizens;
- Consider the area over CSR (and possibly the other subdivisions along Tallahassee) as a populated area – specifically, maintain an altitude of 1000' AGL and a ground-track-distance of ½-mile around the perimeter of CSR.

Gaining more input and responding with positive changes may help to alleviate public dissatisfaction and assist in avoiding the undesirable economic results that may ensue from implementation of the current proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry W. McGee". The signature is written in a cursive style with a large initial "L" and "M".

Larry W. McGee
President, Canyon Springs Ranch Owners' Association

Cc: CWO 4 Kenneth Kimber
Aviation Mission Survivability Officer
kenneth.w.kimber.mil@mail.mil

Cc: Ed Norden
Fremont County Commissioner, District 3
ed.norden@fremontco.com



Helicopter landings on BIm land near Navajo Mountain Mesa and Lakemoor West sub-divisions.

Betty Merchant <betty.merchant@yahoo.com>

Thu, Oct 30, 2014 at 9:03 AM

Reply-To: Betty Merchant <betty.merchant@yahoo.com>

To: "RGFO_comments@blm.gov" <RGFO_comments@blm.gov>

To whom it may concern,

After looking at a map showing the locations of your proposed training landings, I feel that you are too close to houses in the area. The piece of BIm land is not a large parcel and I feel that the noise, danger to wildlife and livestock is apparent because of your landing sites.

If the military needs to do high altitude training, why not use their facilities at Camp Hale, which is higher in altitude and is not near any subdivisions. The Army already owns that land and has for many years. There has to be other parcels of BIm land not close to five or more subdivisions. Bear Trap, Navajo Mountain Mesa, Ranch Estates, High Chateau and Lakemoor West would all be impacted by the noise, flying low over the area and endangering livestock from the ranch in the valley. The Gaffney Ranch has been in operation for generations and Mr. Gaffney runs cattle in the area with permission from the government on BIm land where the proposed landing sights are located.

Please reconsider your proposal as this area for a training sight.

Sincerely,

Betty Merchant

Navajo Mountain Mesa Resident

LAW OFFICES OF MICHAEL MEYRICK, P.C.
P.O. Box 1890
303 .N. 7th Street, Suite 202
Canon City, CO 81215

719 276-2000 - Telephone

888 586-4344 - Facsimile

mwmeyrick@aol.com

December 18, 2014

Transmitted Via Email to rgfo_comments@blm.gov and Via U.S. Mail

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Field Office, Bureau of Land Management
3028 East Main Street
Canon City, CO 81212

**Re: Fort Carson HAMET Proposal On And Around
BLM Public Lands**

Dear Ms. Keohane:

As residents of the Canyon Springs Ranch Subdivision of the Tallahassee Community in northwestern Fremont County, we are concerned about the U.S. Army's HAMET proposal.

The HAMET proposal seeks to utilize the airspace over many thousands of acres of public and private land for low-level military helicopter training exercises to include the establishment of many helicopter landing zones near private property. In considering this proposal, the Government should be mindful of, and include in any cost-benefit analysis, the prospective costs associated with any number of inverse condemnation actions that may be brought by some or all of the thousands of private property owners whose use and enjoyment of their property would be diminished by the Government's actions.

The United States Supreme Court has held that where the Government converts private property, including the airspace above it, to public use by the operation of military aircraft frequently flying at low altitudes and creating noise significant enough to burden a specific class of people, as opposed to the public as a whole, a taking has occurred and the Government is liable for compensation to

the affected owners as a result of that taking. *United States v. Causby*, 328 U.S. 256, 263 (1946).

In the cases that followed from *Causby*, many courts followed a mechanical rule that the flights needed to be below 500 feet over private property in non-congested areas to be compensable as a taking requiring compensation. But the “500 feet rule” was based on the federal regulations that dictated navigable air space. 14 C.F.R. 91.119 (c). That rule dealt primarily with safety as opposed to the devaluation of property as a result of noise. As the case-law has developed in this area, the Federal Court of Claims and the Federal Circuit Appellate Court have held that takings of aviation easements by the Government are not to be judged or limited by any mechanical formula that considers only minimum altitude or a requirement that overflights be directly over the subject property. *See Argent v. United States*, 124 F.3d 1277 (Fed. Cir. 1997) [Compensation was required even though aircraft did not fly directly over property owner’s property]. *Bramming v. United States*, 654 F.2d 88 [Compensation required even though aircraft were wholly within minimum navigable air space requirements that the U.S. had the right to occupy].

The United States Supreme Court has held the Fifth Amendment guarantee that private property shall not be taken for a public use without just compensation was designed to bar the Government from forcing some property owners alone to bear the public burden which, in all fairness and justice, should be borne by the public as a whole. *Armstrong v. United States*, 364 U.S. 40 (1960). Although this proposal could burden thousands of private property owners in Fremont, Park and Teller Counties, the affected parties would be limited to a relatively small class living in the most mountainous regions and not the population as a whole. Accordingly, the costs associated with such a taking should be carefully considered when weighing the proposal at hand.

We echo the comments of others stating concern about the lack of notice provided to residents of the affected areas. The Canyon City Daily Record does not deliver their publication to our area. We ask that more public meetings be held with notification mailed to all residents within the boundaries of the proposed zones and that the comment period be extended by no less than 60 days.

We agree with others that comprehensive studies need to be done to protect the environment, wildlife and residents.

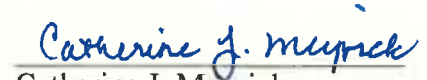
Although we all know the need to better prepare our military for the challenges they will encounter when deployed, we also know that there are existing training facilities where this can be accomplished in this area. For example, the U.S. Army training facility Camp Guernsey in Wyoming was specifically chosen and developed because it mimics conditions in Afghanistan.

The Army's HAMET proposal will, without a doubt, affect the quality of life of our mountain community and diminish our ability to enjoy the rural lifestyle that we have chosen.

Sincerely,



Michael W. Meyrick
1871 Canyon Terrace
Canon City, CO 81212



Catherine J. Meyrick
1871 Canyon Terrace
Canon City, CO 81212



HAMET

Greg Mihalik <greg@smgm.org>
To: rgfo_comments@blm.gov

Fri, Oct 3, 2014 at 6:24 PM

rgfo_comments@blm.gov Nancy Keohane 719-269-8531

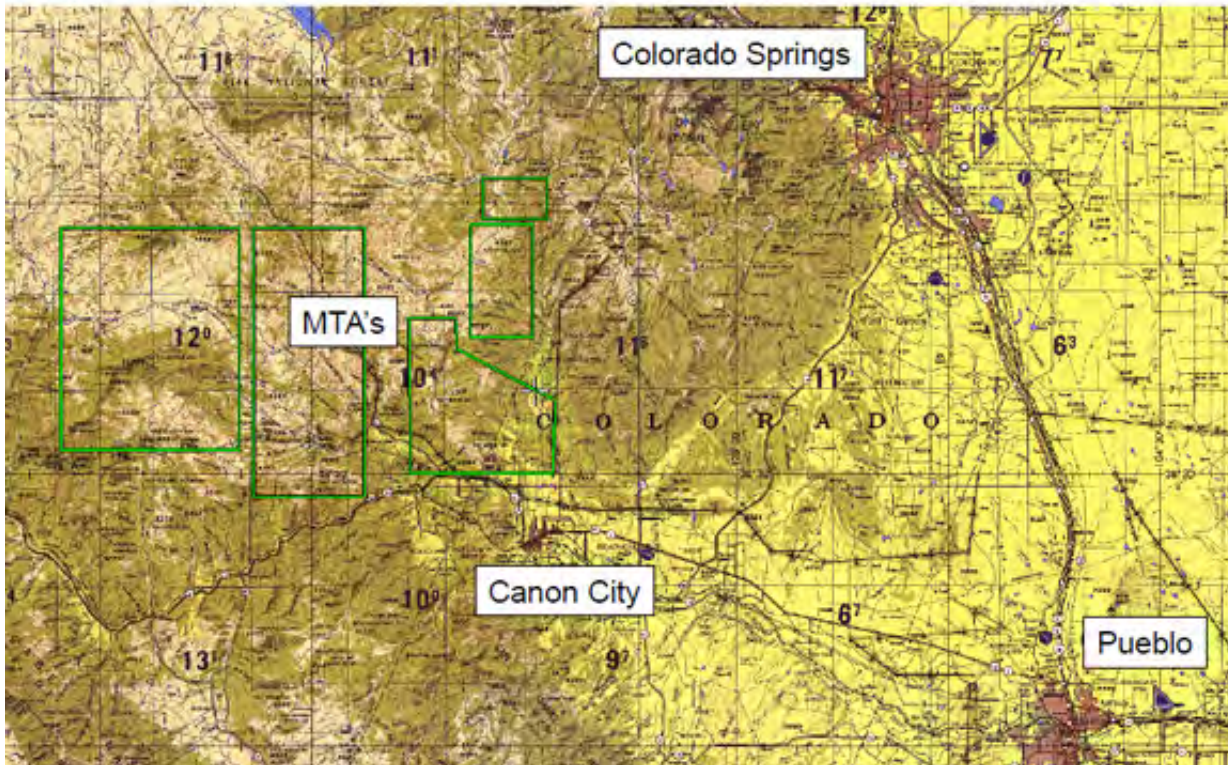
Hello,

I would like to comment on the Ft. Carson HAMET POD, but I find the map provided -

http://www.blm.gov/pgdata/etc/medialib/blm/co/field_offices/royal_gorge_field/planning0/hamet.Par.5638.File.dat/Exhibit_1_-_Area_of_activity.pdf

- lacks resolution and landing zone locations.

Exhibit 1 – Relative location of activity



Where can I find high resolution map of this activity, with roads and trails, appropriately marked with each of the proposed Landing Zones?

Thanks for your time.

Greg Mihalik



HAMET

Carrie N Miller <carrie@goldcountryco.com>

Fri, Dec 12, 2014 at 8:20 AM

To: rgfo_comments@blm.gov

Nancy;

Thank you for the opportunity to comment on Ft Carson and the U.S Army Corps of Engineers request for a ROW grant to several areas in Fremont, Teller and Park County for landing zones.

I am a staunch supporter of all of our military. I believe a strong military is vital to the strength of our nation, and understand the need for comprehensive training to ensure combat ready forces. That is not a problem with me.

The proposal is quite clear in that the request wishes to use 43 landing zones involving a total of 234.676 acres.

Thursday evening in Cripple Creek Sara with the BLM gave a brief rundown of how the "process" works, indicating specific timelines for public comment, notice, review etc. I am concerned that this is a short time limit and that Teller and Park County residents were not notified before December 3, 2014. If it were my job, I would have been fired for dereliction of duty to notify those residents that are directly affected by this proposal. If this were my employee I would fire the person responsible for notifying those directly impacted by this proposed plan, and that is not too hard to figure out who that would be because the maps clearly show where the proposed landing zones are desired. I suggest that be seriously considered. When I spoke to Kyle (pr manager?) he did tell me that the notice was in the Ute Pass newspaper and should be in my mailbox today. (Note: I did not receive that Ute Pass Newspaper until 2 days AFTER the meeting, this is typical of the area. Why not a direct mailer? too expensive?).

Next, I am involved in another "process" specifically regarding the Guffey Gorge. The comment and public involvement periods are significantly different, ie LONGER than any stated whatsoever for this issue. This is a glaring issue and needs to be explained to me and the public involved in the Gorge issue as well!

Keith stated that the Field Office received the proposal request about 1.5 years ago (no date on the published document) and "due to budgetary restraints" have not been able to address it until....now? I find that incredible.

My first concern is the Fast Track and lack of transparency that this proposal is being given. Why the urgency and secrecy. Forget sending out apologies and pacifying statements to the contrary, it is abundantly clear that there is more to this than meets the eye and I am concerned that the BLM is attempting to keep this quiet in order to facilitate the military...for whatever purposes.

Is there any compensation for the use of these landing zones? To anyone?

Next, proposal brings up questions that were unanswered at the meeting and within the document.

How many acres does Ft Carson currently occupy? What have they been using for HAMET training to this point? We have been at war with Afganhistan and in Iraq for 10 years + so.....why here why now? (Answer: 235,000 that is TWO HUNDRED THIRTY FIVE THOUSAND acres at Ft Carsons disposal). I don't know why they don't use places on the property they already occupy for this purpose.

Why not a joint training agreement with the Air Force Academy? Oh, probably because it will involve flying over occupied residential areas vs us hicks out here in the country..."no count"...that is how we feel. You must understand that we are the guardians of this area, shephards and watchdogs.....I cannot tell you how many times I have called in unattended fires, ran into shooters, illegal activities, vehicles in no vehicle zones while I wander around the BLM areas up here. Ft Carson is in a unique position to work closely with the Air Force Academy that has hundreds of thousands of acres available to its disposal at high altitude.....lets not muddy up the air, water or ground with further invasion of military vehicles, prop wash, running off wildlife and disturbing the natural surroundings with this activity!

BLM should not allow this use. IF Ft Carson has overused the current space that they occupy, maybe they need to clean that up instead of encroaching further into natural uninhabited areas and destroy them with the noise, ground pollution, and potential for disaster. The proposal indicates high traffic on the LZ's with varying levels of altitudes indicating a broader impact on the surrounding terrain than the stated "lz"...this will impact several hundred to thousands of feet beyond what the proposal states.

Granting a right of way implies a "forever" right; I do not think this should be granted if in fact the BLM has the authority to do this; there was some question put out about the authority for this purpose. Again, this appears to be at the discretion of the director. Kind of like the definition of what "is" is....its how you are looking at it. Well, take a look at it from my side of the coin. I live here. I pay taxes. Yup. Federal and State. I do not appreciate the abdication of our wild places to hovering helicopters, night maneuvers, low flying landing and prop wash. Theres plenty of other America to use. Go find it.

Ft Carson needs to take this activity elsewhere and explore further resources already available to them vs moving into this area. I am definitely against any furtherance of this activity and support the wholehearted stopping of any current activity in process and definitely do not support any Right of Way whatsoever for this activity. No, No No!

RE: Appeals process...is this, too going to be discretionary by the director or is there some sort of standard to the process and why do you not have this posted in plain sight?

Regards,

Carrie N Miller Broker Associate

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carrie@goldcountryco.com

www.carriesunitedcountry.com

facebook.com/carriesUnitedCountry

(FBpage)

sent through tralrdr@gmail.com



HAMET

James Mitchell <cmebark@hotmail.com>

Thu, Dec 4, 2014 at 10:45 AM

To: rgfo_comments@blm.gov

What will be the hours of night operations?

How many helicopters will be in operation at any one time, i.e. flights of 2, 4, etc., in any one area?

Will flight operations be curtailed in high wind or high fire danger situations?

In the event of a grass or wild fire who will be the OPR for first responders ? If civilian resources are used how and by whom will they be reimbursed?

How will the wild life be impacted particularly during calving or the mating seasons?

Will there be a SOF (supervisor of flying) or FAC (forward air controller) on the ground or in the air in the immediate area of operations?

Will you be publishing an emergency number for the command post for flight operations on Fort Carson?

James Mitchell

700 Apache Trail

Florissant, CO 80816

CMEBARK@HOTMAIL.COM



HAMET

Yvonne Mohr <millermohr@hotmail.com>

Sat, Dec 20, 2014 at 5:53 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

166 Buck Drive

Guffey, CO 8082

December 20, 214

To Whom It May Concern:

We are long-time property owners who currently reside in Pike Trails Ranches near Guffey, CO. While we consider ourselves to be informed citizens interested and engaged in our community and the world, we are somewhat abashed at having just recently been made of aware of HAMET through word of mouth. We are dismayed that the BLM has made little or no effort to reach out to our small community.

According to the documents that we've been able to peruse, the Army and the BLM are concerned solely with "home station training" and an astounding number of "non-tenant training" landings and take-offs on BLM land. There are no restrictions or guidelines for approaches and departures from the LZ's. Indeed, any accidents, fires or disruptions caused by these flights are the responsibility of local authorities. Park County and its special districts can best be described as cash-strapped and ill-equipped to handle emergencies of magnitude.

Allegedly, military aircraft are to remain above 500 feet in elevation and landing on private property would be disallowed. And yet, we have experienced helicopter flights much lower and at night making identification difficult if not impossible. These incidents lead us to wonder how and to whom we are to report violations and/or disruptions. Our expectation is that our concerns would be met by a stone wall or bureaucratic buck-passing. There are no avenues of appeal that respect private citizens and their experiences.

We do not want the BLM to approve the continuation of these activities.

Sincerely,

Bruce Mohr
Yvonne Mohr



Community of Our Lady and Saint Laurence

Affiliates of the Benedictine Fellowship of Saint Laurence

4076 Cabin Creek Road colsl@saintlaurenceosb.org

Canon City, CO 81212 303-885-1922

December 19, 2014

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Field Office, Bureau of Land Management
3028 East Main Street
Cañon City, CO 81212

Re: Fort Carson HAMET Proposal on and Around BLM Public Lands

Dear Ms. Keohane:

We are a small, Antiochian Orthodox Christian monastery of contemplative monks and nuns following the ancient *Rule of St. Benedict*, located on Tallahassee Creek, adjacent to BLM Public Lands. Our 600-acre campus is also home to a retreat center that serves not only Orthodox Christians, but also Christians of other denominations. Our buildings are situated on the banks of Tallahassee Creek, in a valley between Crampden Mountain and Table Mountain.

As you might guess, this location was chosen not only for the beauty of the terrain, but for its isolation and quiet. Silence plays a major role in our lives as contemplatives, and is a major "draw" for those who come here to spend time on retreat. Major portions of the day and night are designated for silent prayer and meditation, something for which our location has proven ideal. We also have four religious services a day in the church on the campus, morning, midday, evening, and night. Further, the unpredictable and disruptive level of noise from the planned exercises not only threatens our treasured silence, it literally threatens the very basis on which our retreat ministry – one of our sources of income – is based.

Having learned of the plans for HAMET, our community and its sponsoring Colorado Not-for-Profit Corporation, the Benedictine Fellowship of Saint Laurence, are very concerned by the prospect of this silence being, quite literally, shaken and shattered at any time of night or day. Three helicopter fly-overs on the evening of Dec. 9th, clearly involving craft of a size or type that were military, not only produced tremendous noise, but physically shook the chair in which I was sitting, along with windows, and caused serious distress to our animals. It saddens us to be in the position of protesting against training exercises geared towards the readiness of our military: Two of our monks are veterans and the Executive Director of the Benedictine Fellowship is brother-in-law to General Charles Campbell, former Commanding Officer at Fort Carson.

I apologize that this was sent to you in the evening of the last day for expressing concerns. I have been ill and am just able to write. Please know that this comes with our respect for the dedication and service of the men and women of our military and, also, those who serve the public interest in the Bureau of Land Management. We sincerely hope that, if it is not possible to relocate the training exercises, some way of minimizing the disruption to our valued way of life might be found.

Sincerely yours,

Ven. Monk Theodore (Phillips)
Prior

Activa in Oratio et Orantem in Actionis



Fort Carson HAMET Proposal

J P MOORE <jpmoore@usa.net>

Tue, Dec 16, 2014 at 9:07 AM

To: rgfo_comments@blm.gov

Cc: Mark Volcheff <mvolcheff@defensebizops.com>, Andy Merritt <amerritt@springsbusinessalliance.com>, Keith Klaehn <kklaehn@aol.com>

To Whom It May Concern-

I am writing in support of the Fort Carson proposed High Altitude Mountain Environment Training (HAMET) plan involving land under oversight of the Bureau of Land Management.

As a retired Air Force officer, I realize the dynamic nature of the threat scenarios to which our military forces are being asked (or will be asked) to respond in our national defense. Recently, the missions supported by the 4th Infantry Division headquartered at Fort Carson, Colorado, were amended through the addition of a Combat Aviation Brigade. The CAB will be providing a range of direct and support combat capabilities, several of which require training in operating in high altitude conditions such as those encountered today in Afghanistan.

The Rocky Mountain environment just West of Fort Carson offers a unique opportunity for the training required to attain top combat readiness. Such training involves operating over and on specific land areas under BLM management. In recent years, some of those areas have been developed and may require some accommodation to address concerns of residents. However, national defense preparedness - a federal government primary responsibility - calls for some accommodation by residents to allow for adequate training.

I strongly urge the BLM to approve the Fort Carson request with limited appropriate accommodation of direct impact concern by the residents directly affected by specific aspects of the plan.

James P. Moore, Col USAF (Ret)
2520 Oak Hills Dr
Colorado Springs, CO 80919
719-598-3245



HAMET ~ Opposed

Liz Morgan <lizbrownmorgan@gmail.com>

Wed, Dec 3, 2014 at 4:22 PM

To: rgfo_comments@blm.gov

Cc: "Greater Arkansas River Nature Association (GARNA)" <reply-ce3ae6eec2-d12c0c466d-8f3b@u.cts.vresp.com>

I am strongly opposed to the proposed action to utilize Arkansas River ecosystem and surrounding communities for additional military operations. HAMET is an outrageous proposal, decreases property values, eliminates quiet enjoyment and use, destroy tourism economy, and heavily impacts wildlife and wild ecosystems which are severely threatened throughout the state.

The BLM is known for providing opportunities for various uses on its lands. I strongly encourage BLM to consider the needs of non-motorized recreational users, residents and tourists alike, when making this decision.

Our lands our being given over to destructive uses at an extraordinary rate and it is time to consider the needs of citizens of the county who want to seek peaceful enjoyment and maintain healthy thriving ecosystems of the shared lands. Also, our region heavily relies on tourism related to the the natural health and beauty and tranquility of the area. This will be yet another nail in the coffin in destroying the tourist based economy of the region.

I currently live near a military fly zone and it is extraordinarily loud and disruptive. The military can not continue to take over more and more lands, and air space. As a community member, I believe in cultivating a community of peace and more military presence is in direct conflict with an appropriate way forward for our community.

As a voting citizen in Chaffee County, I strongly oppose this action.

Liz Morgan



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET Proposal

Muirdc Muir <doug_claudia_muir@hotmail.com>

Wed, Dec 10, 2014 at 12:12 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

We are interested to know if this is just an extension or will there be any changes to:

- 1) The # of flights over Canon City and Fremont County.
- 2) The time and frequency of flights.

We would not be favor of any increase or night time flights as it is extremely noise when they occur. Also, will there be public hearings in Fremont County?

Thank you!
Doug & Claudia Muir



Fwd: Military Helicopter Training over Tallahassee

Keohane, Nancy <nkeohane@blm.gov>

Mon, Dec 29, 2014 at 5:15 PM

To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: Gail Nelson <gail_m_nelson@comcast.net>
Date: Thu, Dec 18, 2014 at 7:56 PM
Subject: Military Helicopter Training over Tallahassee
To: nkeohane@blm.gov

Hello,

We are writing to you concerning the U.S. Army HAMET proposal. As residents of Canyon Springs Ranch (CSR) and members of the Canyon Springs Ranch Owners' Association (CSROA), we would like to submit our comments for your consideration.

We are currently in the process of moving out of the congested metro Denver area because we hear sirens, helicopters, airplanes, and loud engines on a daily basis. Now it is our understanding that we may have to deal with these very same issues at CSR. The main reason we are building our home in the mountains is to escape the noise in the populated front range area.

Because the proposal indicates that it will increase flights both day and night, the possible noise level generated would be considered noise pollution. The effect of this noise pollution on both humans and animal life would cause a decrease in the quality of life, as well as a decrease in property values.

While we realize the Army's need for training in a mountainous environment and support its efforts, we believe that the current proposal and its implementation are not a good solution. The area over CSR and the many other subdivisions along Tallahassee Road is a populated location. For this reason, the Army should continue to maintain an altitude of 1000' AGL and a ground-track-distance of ½-mile around the perimeter of CSR.

Please consider the input from other residents in our area and respond with positive changes to avoid

undesirable noise pollution and economic effects that may be caused by implementation of the current proposal.

Sincerely,

Thomas and Gail Nelson

143 Seifert Street

Canon City, CO 81212



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

Marshall <mongo@chaffeeeco.net>
To: rgfo_comments@blm.gov

Mon, Oct 6, 2014 at 8:50 AM

After reviewing the documents made available on the BLM website, the only concern I have is the noise and activity impact on the Bighorn sheep.

Would like to at least see an activity restriction during lambing season. Other than that, I think that the area is well suited for HAMET

Marshall Nichols

Howard, CO



HAMET

lisa <mamawandpa@hotmail.com>

Fri, Oct 31, 2014 at 10:30 AM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Thank you for asking for public comment on the HAMET project. I am writing this on my iPad so please excuse the poor use of capital letters. I live in southern teller county and booger red north and south, wrights reservoir, and guffy gorge (or whatever you all renamed it) are in my back yard. Our family uses booger red almost weekly except during hunting season during which there are too many hunters out there. Every time we go to booger red there are at least three to four other groups of people using the area, which for blm is pretty heavy use! People camp, skeet shoot, paintball, archery, hike, look for arrowheads and picnic out there, as well as hunt during the seasons.

The most heavy use is of course on the weekends, so please consider this. Living in this area we know that the military already use the areas on the map, and they ramp up the night trainings before they do a big mission such as when they "got" bin laden. This is all well and good, and we know the military needs to train, and we appreciate the military. However, we moved here instead of to fountain for a reason, and want to maintain our property values.

I also worry that this is phase one and that in ten years this "grant" will become full use going to ft Carson. Please do not let this happen. The military chose to move their helicopter brigade to ft Carson, but could have also moved to a less populated mountain area like Wyoming.

Although it may not look like it from a metro standpoint, southern teller county is populated. There are eight subdivisions that will be affected by this project, with approximately 3500 people, most of whom work shifts at the mine and casino industry. This means there is no "good" time to have more of a noise free schedule. If you live on a mountain like we do, the helicopters fly over it to get their drop areas, and They aren't that much higher than our trees. It is also important to note the cc&v mine has scheduled detonation times and they close roads at those times, so please be wary of the times the military flies over those areas. Booger red south also has open uranium mine areas, so please keep that in mind when considering the environmental impact for our residents, as well as military personnel. Booger red north has some new mining claim areas for Quartz and gemstones, and these are being actively mined, albeit on a small scale.

It appears that guffy gorge (I don't remember the new name blm put on the sign) will be impacted as well, although it is difficult to really tell by the map. This area is used to the point that we don't even go out there anymore because there are too many people out there all the time.

I know there are not supposed to be refueling or other hazardous to the environment things happening with this project, but I do worry about crashes, and know how difficult this terrain is to fight when a fire happens. Our community has had too many fires in and around, and we still have not recovered emotionally, so please be careful.

Due to many reasons, most of which have to do with population increases in the subdivisions I think, we have a large deer population. It is so important for the deer to be hunted in this blm area and not driven into the subdivisions even more, as the more deer in an area, the more lions and other big cats. Those of us that use the blm are environmentally conscious of this, and are very respectful of the big cats and their strengths against our pets and children.

I also have to speak to the health and wellness of two families in our neighborhood, as they moved here because they have ptsd from serving in Vietnam and Afghanistan. The Vietnam vet is better, but still has some residual effects especially when he hears helicopters. When we had the fires around bear trap and Navajo mtn Mesa, he did increase his medications to deal with the stress of the helicopter noise, so he is better equipped to deal with the noise. Our new neighbor has moved three times since being discharged, as she is very sensitive to loud noises, so the community is very cognizant of assuring her comfort. She feels she finally has a home. Thank you for your asking for public comment on the HAMET project. Our community uses our public lands and this writer and her family is grateful for them.

Respectfully,
Lisa Noble
527 Arapahoe Drive
Navajo Mountain Mesa

Florissant, CO
PO Box 33
Cripple Creek, co 80813
719-689-3745

Sent from my iPad



HAMET

O'Connell Property Group, LLC <oconnellenterprises@gmail.com>

Thu, Dec 18, 2014 at 8:22 PM

To: rgfo_comments@blm.gov

To Whom It May Concern,

Please allow this letter to serve as my written voice of opposition to the HAMET project proposed in and around the area of Guffey, Colorado in Park County. As a resident of Guffey, not only do I feel this activity/training will impact the area residents' and wildlife's way of life, it will also have a negative impact on property values and marketability of the area in general. Private land owner voices should be heard and rights be protected. This seems to be an item that is being kept in too hushed a manner; public meetings in the areas of consideration should be made a priority so all sides may be properly heard. My suggestion would be to move these exercises to an area less populated or more accustomed to such levels of noise and intrusion.

--

Kind Regards,

Rachel O'Connell

O'Connell Property Group, LLC
PO Box 218
Guffey, CO 80820
719-285-6884

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Our conclusions are limited to the conclusions specifically set forth herein and are based on the completeness and accuracy of the above-stated facts, assumptions, and representations. If any of the foregoing facts, assumptions or representations is not entirely complete or accurate, it is imperative that we be informed immediately, as the inaccuracy or incompleteness could have a material effect on our conclusions.

Nothing in this message is intended to constitute an Electronic signature for purposes of the Uniform Electronic Transactions Act (UETA) or the Electronic Signatures in Global and National Commerce Act ("E-Sign") unless a specific statement to the contrary is included in this message.



Proposed Helicopter training on BLM land above Lakemoor West Ranch

christcortiz@aim.com <christcortiz@aim.com>

Fri, Oct 31, 2014 at 12:51 PM

To: RGFO_comments@blm.gov

Hello,

I have just been made aware of the proposed Military Helicopter training on BLM land above Lakemoor West Subdivision (Lakemoor West Ranch). I am against this proposal for several reasons; Quality of life that the residents within this valley enjoy and the wildlife that abounds here. My wife and I have lived in the valley for over 3 years now and have witnessed the following wildlife. There are several deer herds in the valley and we have noticed one particular herd made up of about 5 to 6 does that make their home around the vicinity of our house, each year there are fawns born, we have seen 4 fawns born out of the small herd of does. There is a herd of Elk that move into the valley each year several times a year, this herd is made up of about 19 to 25 Elk and several bulls are in this herd. They move into the valley in the evening from the South and will move out of the valley each morning (before the sun is up) and move to the North of Valley, moving back down into the valley at dusk. Time frame has been late spring and early fall. This particular herd appears to winter south of the valley and move to higher ground in Summer. The fact remains that these Elk use the Valley as a route to higher ground, feeding as they go. Training noise would be detrimental to this herd, BTW, we have seen calves in this Elk herd each of the 3 years. Other wildlife, Fox, badger, Pygmy Owls, Raptures, and Turkey Vultures frequent the valley all summer. Wild Turkeys live in and around the valley, they also have broods, number of this has been estimated at about 30 adult Turkeys. In the valley there are ferrets that prey on prairie dogs in the summer months. Big horn sheep have been seen in the valley as have bear and mountain lion, and bobcat sightings have occurred. The first year we were here, we experienced a flock of whooping cranes land in the upper valley, just south of our house. Of course the coyote population is healthy. At 90 plus Decibels at 200 feet altitude would cause quite a bit of concern for all residents in and around the valley, both human and wildlife. I have not heard whether CDOW has any concerns over this proposed BLM land use.

In Summary, the proposed training site, would be detrimental to the Wildlife as well as the domestic livestock that the rancher and residents winter in the valley, and to the quality of life for the residents in and around the Lakemoor West Ranch. I also need to mention that here may be Critical Habitat that may contain endangered species, or at risk species, since the valley is a well established waterway and drainage.

Sincerely,
Teburcio and Irene Ortiz
875 Lakemoor Drive
Florissant, Colorado

Bureau Land Management
3028 East Main Street
Canon City, CO 81212
10/27/2014

Dear Ms. Keohane

I recently learned about the proposed usage of BLM land by Fort Carson's Combat Aviation Brigade, to conduct HAMET training in the vicinity of my home at 440 Bernard Creek Drive in the Lakemoor West Subdivision, Florissant, Colorado and which incidentally, is within 1000 feet of the proposed landing zone #705. Additionally, many of my friends and neighbors will be directly affected by LZ's #701-706. In fact my next door neighbor is with 425 feet of landing zone #705.

First of all I want you to know that I am a patriot in every sense of the word. I served with distinction for 42 years with the United States Air Force, serving 21 years on active duty and 21 years as Deputy Director of Services at Peterson AFB in Colorado Springs, before retiring from Federal Service in 2002.

I have maintained a resident in Lakemoor West since 1975 and along with my wife and two children, have enjoyed the serenity and beauty that this incredible land has blessed us with. The elk, deer, turkey, bear and big horn sheep have provided us and our neighbors with untold hours of enjoyment, and an education that no amount of money can buy. To lay on our decks in the dark of night, in it's stillness and see the millions of stars and constellations without interference from street lights or flashing neon signs has been most memorable, and now our six grandchildren are experiencing this unbelievable gift.

I have numerous concerns on this proposal, but mostly the lack of communication to the residents and property owners in the affected areas is of grave concern. I only learned of this proposal on the 26th of October through an e-mail from the President of our Homeowners Association and an article in this weeks Colorado Springs Independent Newspaper, referencing "Army seeks chopper flights out east", which in turn referenced another article, "Hard Landings" dated 19 March 2014, revealing the Army's proposal to the BLM on the use of our area. Why have there been no public

meetings in Teller and Park counties on these proposals? What is amazing is that the BLM in Canon City has devoted untold years, the hiring of a new employee and thousands of dollars on Christos' "Over the River" art project, that when and if approved, will only last two weeks? and yet only limited communication concerning this potential 30 year agreement. No results from the 7 Oct Abby Event Complex public meeting with BLM and the Army Corps of Engineers?, that by the way appeared in a short notice article in the Colorado Springs Gazette on 5 Oct?, Sunshine Law violation?

I'm sure you're well aware that the BLM manages 8.4 million acres of public land in Colorado. Your charter directs you to manages these lands for a multitude of purposes, including recreation, mining, wildlife habitat, wilderness, energy development and livestock grazing. You are to adhere to the principles of multi-use management outlined by the Federal Land Policy Management Act. This means that you are to balance outdoor recreation and preservation of wildlife habitat, air and water, and historical values with environmentally responsible development of the land and its resources. I certainly hope that this will be your main consideration in the decision with this proposal.

My main concerns are noise, air, water and ground pollution, access to the proposed LZ's across private land, wildlife nesting and bedding habitats, probability of fires and erosion of sensitive drought stricken land along with the fauna and flora it contains, current grazing authorizations, and restricted access to hunting areas. The possibility of devaluation of our homes and land values, the probability of increased insurance costs are also of significant concern with this proposal.

Why has the US Forest Service recommended curtailing landing zones (LZ's) within the confines of the Pike and San Isabel National Forests west of Colorado Springs? and have you ordered an EPA assessment review?

Fort Carson is a valuable resource to our community and our nation, and I certainly appreciate the sacrifices our men and women endure in their mission, as I did for 42 years. However, I wonder why this was not addressed before the decision was made to transfer the Combat Aviation Brigade to Fort Carson? There are just to many unanswered questions.

This land is my legacy to the future for my family, I will do what ever it takes to insure it's preservation.

Robert P. Paige Jr.
United States Air Force Retired

cc: President, Lakemoor West Property Owners Association



Guaranteeing that open lands remain a part of southeastern Colorado's heritage.

December 16, 2014

Nancy Keohane, NEPA Specialist
BLM Front Range District Office
3028 East Main Street
Canon City, CO 81212

Re: Fort Carson's HAMET Proposal

Dear Ms. Keohane:

Please accept the comments below of the Palmer Land Trust on Fort Carson's proposal to use BLM lands for military helicopter training, as part of the HAMET NEPA process. Palmer Land Trust has concerns about the proposal and its impacts on conservation efforts along the Gold Belt Scenic Byway and surrounding area including Guffey.

Palmer Land Trust and our landowner and funding partners have worked to create a conservation corridor along the Gold Belt Tour Scenic Byway and surrounding area. We believe that HAMET activity in this area will likely impact the conservation values of the area and compromise the significant investment made to protecting the area. I therefore recommend that the BLM remove landing zones 701-706, 401-410, and 601-605.

Palmer Land Trust is a nationally-accredited land trust working to preserve and protect important open lands in southeastern Colorado. Since 1977, we have helped private individuals and communities protect nearly 80,000 acres of farms, ranches, wildlife habitat, scenic corridors, and public open spaces. We are one of the 25 largest local land trusts in the United States based on conservation easement holdings. We are dedicated to ensuring that these open lands and the conservation values they hold remain a part of southeastern Colorado's heritage.

A significant number of the proposed landing zones (LZs) are in and around the Gold Belt Byway, which has been designated both a National Scenic Byway and a Colorado Scenic and Historic Byway. This area is breathtakingly beautiful, with scenery ranging from rolling mountain forests and ranchlands to deep rocky canyons, and its rich history is readily on display, from fossils to old gold mining towns. It is home to an impressive array of wildlife species, including songbirds, raptors, deer, elk, bighorn sheep, wild turkey, bear, mountain lion, and lynx. The Gold Belt Byway is a very popular driving tour with Colorado citizens and tourists alike, and the tourism associated with it contributes significantly to local economies in the region. It is a unique and special landscape, important to the heritage of the Pikes Peak region. Recognizing this, Palmer Land Trust has made a significant investment of both staff time and money to ensure that this area, and its scenic, open space, wildlife, and agricultural values, are preserved for generations to come.

Palmer Land Trust protects via conservation easements approximately 7,000 acres of land in close proximity to the proposed landing zones. These privately-owned properties are in Teller and Park Counties along the Gold Belt Byways of Teller County I, High Park Drive, and Shelf Road, and in Park

County near Route 9. To help the owners of these lands protect the open space and conservation values of their treasured landscapes forever, Palmer Land Trust raised approximately \$5 million dollars from organizations such as Great Outdoors Colorado, the National Resource Conservation Service (of the United States Department of Agriculture), National Scenic Byways Program of the Federal Highway Administration, and private foundations to place conservation easements on these properties. The landowners themselves donated private property rights worth another \$12 million dollars.

The protection of these properties with conservation easements serves the following clearly delineated state governmental conservation policies:

1. CRS § 38-30.5-101, *et seq.*, providing for the establishment of conservation easements to maintain land “in a natural, scenic or open condition, or for wildlife habitat, or for agricultural ... forest or other use or condition consistent with the protection of open land, environmental quality or life-sustaining ecological diversity.”
2. CRS § 33-1-101, *et seq.*, which provide in part that “it is the policy of the state of Colorado that the wildlife and their environment are to be protected, preserved, enhanced, and managed for the use, benefit, and enjoyment of the people of this state and its visitors,” and which also provide that “it is the policy of the state of Colorado that the natural, scenic, scientific, and outdoor recreation areas of this state are to be protected, preserved, enhanced, and managed for the use, benefit, and enjoyment of the people of this state and visitors of this state.”
3. CRS § 35-3.5-101, *et seq.*, which provide in part that “it is the declared policy of the state of Colorado to conserve, protect, and encourage the development and improvement of agricultural land for the production of food and other agricultural products.”

The fourteen Palmer Land Trust-protected properties include private residences and working lands. They embody the essence of the untouched, tranquil south-central Colorado Rockies landscape: coniferous forests and woodlands, open meadows, abundant wildlife, streams, and rock outcrops. They provide scenic vistas, important wildlife habitat, and buffers against development. Their owners raise cattle, goats, chickens and horses, and produce hay, eggs, beef, and dairy products.

The \$17 million dollar investment that has been made in these properties by Palmer Land Trust, the State of Colorado, the federal government, and private individuals and foundations was made to ensure that all of the conservation values on these properties are protected for current and future generations to enjoy. We believe that the HAMET proposal poses a significant threat to this special area and to the conservation values on the Palmer Land Trust-protected properties.

The proposal allows up to 62,000 large helicopter flights, landings, and takeoffs per year at a total of 69 LZs, with up to 8 landings per site per day. Most of the flights will originate from Fort Carson in Colorado Springs. In the areas immediately near PLT's protected properties, there are 21 proposed LZs. That could mean up to 168 landings per day, every day, very near to these important protected lands. While we understand that the LZs would be only on BLM lands, visual and auditory impacts will not be limited to BLM lands. Additionally, because each pilot will design his or her flight path as part of the assignment, flight paths could, and likely would, cross protected property.

This amount of aerial activity and noise from large helicopters is highly likely to disturb the tranquility of the area and impact its scenic values and wildlife. Additionally, we believe it may adversely impact the ranching operations on the working lands PLT has committed to protect as agricultural land.

The Fort Carson HAMET Plan of Development states: “Fort Carson would prefer to avoid areas of concern where conflicts with resource values or other public land users are identifiable or foreseeable. These areas of concern include . . . sensitive plant and wildlife habitat . . . and other sensitive or protected resources.” We believe that conflicts with resource values in the areas of concern protected by our easements are both identifiable and foreseeable. Given this, as well as the significant efforts and funding invested in protecting these important landscapes, Palmer Land Trust recommends that, if the BLM approves Fort Carson’s proposal, it remove from the permit the twenty-one landing zones that are in close proximity to the fourteen PLT-protected properties – 701-706, 401-410, 601-605.

Please feel free to contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Jewett". The signature is written in a cursive style with a large initial "R".

Rebecca Jewett
Executive Director

P.O. Box 1373
Fairplay, CO 80440
(719) 836-4201 (Fairplay)
(719) 836-3273 (Fax)
website: www.parkco.us

COUNTY OF PARK
Board of County
Commissioners



February 4, 2015

RECEIVED

FEB 04 2015

Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, Colorado 81212

Re: High Altitude Mountain Environment Training Proposal

Ladies and Gentlemen:

Please accept these brief comments regarding Fort Carson's proposal for extended approval for High Altitude Mountain Environment Training (HAMET) on BLM lands in Park County and other locales. While we recognize that the public scoping comment period has expired we are also aware that the public comment process will continue when a draft environmental assessment is ready for review.

The Park County Commissioners do not currently oppose the HAMET proposal, although we reserve the right to change that position after reviewing the environmental assessment. We do, however, have significant concerns about the potential impact that HAMET activities might have on Park County, its residents and visitors.

As you know, Park County is mostly rural in nature. Those who have moved here have done so to enjoy the beauty, quiet and solitude of the area. The lovely mountain environment of Park County attracts thousands of visitors from Colorado and across the country each year who come to enjoy the scenery and wide variety of recreational activities including fishing, hunting, wildlife viewing, hiking, skiing and boating. Needless to say, any sort of intensive use of the area for HAMET activities could disturb wildlife and negatively affect the livability and attractiveness of Park County for residents and visitors, with a corresponding effect on Park County's local economy.

The primary issues are, of course, noise and privacy. While we certainly recognize the national defense importance of the HAMET program it must, in our view, be balanced against the reasonable expectations of landowners and residents of Park County to maintain the quiet and privacy they have enjoyed for many years. In this regard we encourage BLM to assure that an adequate distance between helicopter landing sites and residences is required by any permit issued for HAMET.

We very much appreciate your consideration of these comments and will provide additional input once the draft environmental assessment is available.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Mark Dowaliby", written over a horizontal line.

Mark Dowaliby, Chairman

Richard F. Hodges
(719) 836-4209

Mike Brazell
(719) 836-4210

Mark Dowaliby
(719) 836-4211



Fort Carson Proposed Agreement with BLM

Henry & Arlene Parker <hparker100@aol.com>

Fri, Oct 31, 2014 at 11:49 AM

To: RGFO_comments@blm.gov

To Whom It May Concern,

As residents of the Lakemoor West Subdivision in Teller County, we are very concerned regarding the proposed agreement between Fort Carson and the BLM.

Landing Zones 701 through 706 adjoin many property owners in Lakemoor West, and the landing zones are very close to many homes. We have experienced low level helicopter flights in this area, and they create excessive noise which has a negative impact on the residents of our valley as well as the wildlife. In addition, the potential for accidents and fires is a concern in such a heavily populated area.

We are supportive of our military; however, there are other sites which could be used which would not impact such a large number of permanent residents.

Because of our concerns stated above, we request and recommend this agreement not be approved.

Thank you for your consideration.

Henry and Arlene Parker
115 Ranch View Road
Florissant, CO 80816

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environment Training since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

This scoping period will run from Oct. 1 to Nov. 1, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts at <http://blm.gov/3zld>.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

Nancy and BLM Council:

First of all, I am not at all anti military and want to support our pilots. However as a resident in the area of the training and landing zones I am adamantly against using the neighboring BLM land for that purpose.

My husband and I moved to the Guffey area to live out our dream of a peaceful and lovely retirement. This helicopter training program not only shatters that dream but will not enable us to even sell our property at a reasonable price in order to move to another area in the state. Our retirement dream and so many others who came to this part of the state to live the rest of our lives in this beautiful area will be sorely disappointed in the care the BLM has shown for this wonderful area of our state.

Jane pate

janepate@live.com



Fwd: Comments about HAMET

Gayle Currie <rossmere@msn.com>

Mon, Dec 15, 2014 at 8:42 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Sent from my iPad

Begin forwarded message:

From: Gayle Currie <rossmere@msn.com>
Date: December 15, 2014 at 8:35:10 PM MST
To: "RGFO.comments@blm.gov" <RGFO.comments@blm.gov>
Subject: Comments about HAMET

My comments are in response to the proposed Army HAMET project using BLM land in Teller, Park and Fremont counties. I am strongly opposed to this project for the following reasons:

(1) According to the Term & Conditions Sec 505, page 47 right of way for helicopters can not be granted since it is in violation of this section which states each right of way will minimize damage to scenic and esthetic values and fish and wildlife habitat and otherwise protect the environment. I feel that the wildlife and community will not be protected from the noise of the helicopters flying around the area at all hours day and night. We have herds of elk, deer, and long horn sheep that roam all over these counties. They will move away when the noise begins. The people in these communities moved here to get away from the noise of the cities and we enjoy the peace and quiet. This quiet environment will be non existence once the helicopters start to fly. Some residence in Guffey have been complaining about the noise level and the helicopters flying at 2AM shinning lights into their bedroom windows. This has been a continuing problem and still not resolved yet.

(2) Outdoor recreation such as horseback riding, hiking and camping will be non- existence in the BLM land where the landing zones are and the surrounding area if this project is approved. In accordance with page 64 para7: public lands be managed for protection of quality of scientific, scenic, historical, ecological, and archeological value for preservation and protection... To provide for outdoor recreation. BLM will also be in violation of this.

(3) Our quality of life will be effected tremendously. The noise from the helicopters will be heard all around the area. The amount of air traffic will be seen and heard in our quiet communities disturbing everyone living here day and nighttime. Not only will it effect the people but also our livestock to include cattle, horses, chicken and goats. It will make horse back riding in our area extremely dangerous when the helicopters are flying. Horses spook at loud noises and can even run through fences to get away from the helicopters if they approach in the area. Our property values can be effected and will probably decrease. Who wants to live in an area with a lot of air traffic and noise? Our communities will not be regarded as God's country like it is today. Usually land that borders BLM or national forest is very popular and in high demand but if this project is approved that will not be the case. People will try to sell their property. The wildlife in our area will be driven away from our community due to the noise level and air activity. So much for protecting the wildlife.

(4) This community does not have the infrastructure to support the amount of helicopter activity proposed by the HAMET project. We have volunteers that provide the fire and EMS support to protect our community. These men and women are not trained to fight aircraft fires. If property

values decrease the money available to support the fire department will be decreased.

(5) The fire danger is stage 3 during the spring and summer depending on the amount rainfall we receive. We do not need nor want anything that will precipitate a wild fire or Forest fire in our community. We have been through the Waldo Canyon fire and do not want to experience another wild fire again.

All these issues that are listed are very important to us. This community supports the military as was voiced during the last meeting. Both my husband and myself served over 20 years in the Air Force and we are aware of the importance of the military and their training. But to plan this training so close to populated areas is not negotiable. BLM owns many thousands of acres of land located way from our communities. Why not look at these areas for their landing sites? We would be more than happy to explore other areas with them if they would like our help.

Sincerely,

Lt Cols Paul & Gayle Currie, retired USAF

Sent from my iPad

Peaceful Skies Coalition
P.O. Box 322
Arroyo Hondo, New Mexico 87513

December 19, 2014

VIA E-MAIL

rgfo_comments@blm.gov

Re: Scoping comment

Bureau of Land Management Royal Gorge Field Office
3028 East Main Street
Cañon City, Colorado 81212,

To Bureau of Land Management:

Peaceful Skies Coalition (PSC) is submitting comments on the Plan of Development, High Altitude Mountain Environment Training (HAMET) submitted to the Bureau of Land Management by Fort Carson and the US Army Corps of Engineers, Omaha District. Limited HAMET activities have been carried out in this area in the past on US Forest Service land under a Casual Use Agreement.

Due to the tremendous increase in scope of the proposal and the controversial nature of the addition of forty-three helicopter landing zones (HLZ) and an exponentially greater number of flights for high altitude training, the Bureau of Land Management needs to reject the Plan of Development as submitted by Fort Carson and prepare an Environmental Impact Statement. The coalition does not agree that this project affords the BLM the authority to bypass the National Environmental Policy Act (NEPA) to approve this as an “easement” under by Title V of the Federal Land Policy Management Act of 1979, as amended.

As stated in the CFR Title 43: Public Lands: Interior

[PART 46—IMPLEMENTATION OF THE NATIONAL ENVIRONMENTAL POLICY ACT OF 1969:](#)

§46.100 Federal action subject to the procedural requirements of NEPA.

(a) A bureau proposed action is subject to the procedural requirements of NEPA if it would cause effects on the human environment (40 CFR 1508.14), and is subject to bureau control and responsibility (40 CFR 1508.18).

In order for the public to provide informed comment on the Royal Gorge HAMET, the public needs to be provided all information about adjacent and other proposed federal projects; whether those on public lands, private lands, or military land and airspace. A bioregional approach is essential to an accurate impacts analysis. The lands within the boundary area comprise only a part of the larger bioregion. Avian flyways, watersheds, wildlife migratory pathways, air and water quality and other natural systems extend well beyond the boundaries of the proposed

HAMET boundaries.

Special attention should be paid to the severe drought and fire danger, both within and adjacent to the proposed HAMET. Extraordinary protection of the public lands must be the highest priority of public land managers. Mitigation and remediation will be next to impossible to accomplish with the lack of water. A high degree of stress is already affecting the resiliency of the land and the species that live in and around the region.

Peaceful Skies Coalition believes that public lands must be preserved as peace zones, protected from any military use whether ground-based or air-based. Low and middle altitude flights must not be allowed with the exception of general civilian aviation and emergency aircraft, such as fire fighting, search-and-rescue, and emergency medical response.


Cumulative impacts have not been presented for this proposed expansion project. Cumulative impacts must include all activities in the area, not only those in a narrow geographical location. As stated above, the study should consider entire bioregions, not just the area within the proposed HAMET boundary. The Federal courts have ruled that the government “cannot isolate a proposed project, viewing it in a vacuum.”

As the NEPA analysis is prepared, establishing the proper geographic scope or boundary for a cumulative impacts analysis is extremely important because the proposed action will have direct, indirect, and “additive” effects on resources far *beyond the immediate* area. By way of example, for resident or migratory wildlife, the appropriate geographic area for the cumulative impacts analysis will be the species habitat or breeding grounds, migration route, wintering areas, or total range of affected population units. Consideration of other state, private, and other federal actions as well as natural occurrences or events that have taken place, are taking place, or proposed to take place that will similarly impact the region’s wildlife populations and habitat, and human communities.

We hope you find these comments to be helpful, informative, and useful in your efforts to bring this expansion into compliance with the NEPA and other substantive statutes. Peaceful Skies Coalition requests that Carol Miller, an officer of the coalition, be placed on the recipient list for notices of any developments in the HAMET proposal as it moves forward.

If you have any questions or comments, or wish to discuss the issues raised in this comment please do not hesitate to contact the Peaceful Skies Coalition representative.

Sincerely,



Carol Miller
carolmiller@newmexico.com



HAMET Right of Way Proposal

John Posavad <jposavad@msn.com>

Fri, Dec 19, 2014 at 8:05 AM

To: "Lee.Colburn@mail.house.gov" <lee.colburn@mail.house.gov>, "mbrazell@parkco.us" <mbrazell@parkco.us>, "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

To whom it may concern:

This letter is regarding information we have recently received from friends and family regarding the HAMET TRAINING proposal to use BLM lands surrounding Guffey, Colorado. As a landowner of property adjoining the BLM and Thirty One Mountain, I believe I should have been informed of this proposal instead having to find out through word of mouth. Why have I not been directly contacted? And why do I feel there has been little opportunity to inquire about the plans of use, the effect on the land and on us as neighbors? I'll tell you why. Because neither the US Army nor the BLM administration has disclosed this information to me.

From what I understand the US Army, Fort Carson Post has requested for permanent Right of Way for usage of BLM administered lands in the Teller, Fremont, and Park county areas for the HAMET training program. This program and lands affects would encompass a large area that is relatively heavily populated by my understanding of military use standards. This program will effectively impact 100's of private landowners, their families, businesses (cattle and horse operations, hunting guides, etc.) and livelihoods. In addition, my knowledge of these type of programs (all be it limited because no one has contacted me directly) is that they will completely change the landscape to which these people have chosen to live and in some cases earn an income from. My father is a former US Navy Commander and he has shared with me the amount of damage will be caused to the physical landscape not to mention the ripple affect it will have on the rest of the surrounding landscape.

As a local property owner I am deeply disturbed not only by the proposal and lack of communication, but also the means to which it is being done. We own several hundred acres of ranch land including a small home, just outside of Guffey, CO which would be directly affected by these proposed operations. How are we going to be compensated for our potential lost incomes, decrease in property values, increased stress related health issues and other value out from this program? Do you not care about the CO landowners and the impact you will have on our lives?

I understand the importance of training and preparing our military service members for whatever challenges they face. However, I also believe there are many other locations to which this type of training would be better suited without directly impacting so many private

citizens who have decided to live in and use this beautiful part of CO. We purchased the land we currently own to enjoy in peace - not to have it turned into a military training site. I understand the actual "landing zones" are on BLM lands; however the full operations will dramatically affect everyone around these landing zones. With helicopters flying extremely low over homes, cattle, horses and wildlife it will change this area and the living conditions dramatically. It could make it impossible to continue our current cattle operations, may make it unsafe to ride our horses, sleeping would become impossible when flight operations are present, the potential for having pictures rattled off the wall, etc. is completely unacceptable. The impact to the wildlife that we love would also be greatly impacted. Our family works hard to protect the natural resources on and around our property and this proposal will change the people, the natural resources and surrounding lands forever if the HAMET Right of Way is granted.

We have also recently been informed by the BLM that lands surrounding our property have been designated "Foot & Horse" ONLY lands as part of an effort to minimize the impact on these lands. Some of these same lands now being proposed as landing zones for the HAMET Right of Way. I find this to be an extreme example of the double standard. BLM is unwilling to allowing us, their neighboring landowners who are directly impacted and have a desire to maintain and improve the surrounding BLM properties including the utilization of existing roads in order to check cattle, fencing, etc. Yet the BLM is willing to allow the military to take these same lands and turn them in to landing zones for military operations which will likely cause extreme damage to the resources (land damage; water contamination; changed wildlife behavior including breeding, calving, and wintering grounds) thus directly impacts ALL the surrounding landowners. Unless the military is planning to fly in on horses than what good is designating the land as "Foot & Horse" only. I find this to be completely irresponsible of the BLM administration and in many ways goes directly against their responsibility to maintain the public (not US Army training grounds) BLM lands. It make me ask how much money is the military paying for the use of BLM land. How much money is being paid to buy off those who are supposed to serve and protect our BLM land? What is the BLM gaining by granting this proposal?

Finally, there is the safety concern of all of the surrounding landowners, their cattle and property should an accident happen. I know there is an inherent risk to all military members during these type of operations, but it is not fair to the community to expose us to these risks when we have no option to mitigate or avoid the risk. I thought the military is supposed to serve and protect, not put me at an increased risk of harm by running drills out of my front porch. Who is going to pay me when debris or low flying aircraft injury or kill livestock on my land? Who is going to pay to cover the long-term damages caused to my land and livelihood? Who is going to pay for the increased insurance costs need to cover my losses? And Heaven forbid, who is going to pay when an inexperienced pilot crashes killing me, one of my family members or a neighbor? No monetary reimbursement is worth the risk of these potential losses the HAMET Right of Way places on us and every other private citizen that owns and uses this land.

For all the reasons stated above, I strongly oppose the BLM granting the US Army the HAMET Right of Way in the Teller, Fremont and Park County areas. I believe and request

the US Army, BLM and other government agencies need search for better suited lands which will not impact 1000's of private residents. They exist all across the Western United States and many are in close proximity to the Fort Carson Post. I also believe there should be an independent 3rd party hired to complete an Environmental Survey before any proposed "Right of Way" is granted.

Regards,

John Posavad

Aspen Meadows

Guffey, CO 80820

jposavad@msn.com



HAMET Training Proposal Response

Rob Posavad <rposavad@gmail.com>
To: Rob Posavad <rposavad@gmail.com>
Bcc: rgfo_comments@blm.gov

Thu, Dec 18, 2014 at 6:27 PM

Re: HAMET Training Proposal Response

To whom it may concern:

I have recently been made aware of the US Army, Fort Carson Post requested for permanent Right of Way for usage of BLM administered lands in the Teller, Fremont, and Park county areas for the HAMET program. This program and lands affects would encompass a large area that is relatively heavily populated when it military use standards, in effect impacting potentially 1000's of private landowners, their families, businesses (cattle and horse operations, hunting guides, etc.) and livelihoods, not to mention completely changing the landscape to which these people have chosen to live. I am one of these property owners and am deeply disturbed by not only the proposal, but also the means to which it is being done. We own several hundred acres of ranch land with a small home, just outside of Guffey, CO which would be directly affected by these proposed operations.

I consider myself a patriot and huge supporter of the US Military. My family has deep military roots (my father was a US Navy Commander, my wife's cousin a US Navy Seal, and many other family members either active or retired military) so I understand the importance of training and preparing our military service members for whatever challenges they face. However, I also believe there are many other locations to which this type of training would be better suited without directly impacting so many private citizens who have worked their entire lives to live in this beautiful part of our state.

We purchased the land we currently own to live, work, hunt and enjoy in peace. Not to have it turned into a military training site. I understand that the actual "landing zones" are on BLM lands; however the full operations will dramatically affect everyone around these landing zones. With helicopters flying extremely low over homes, cattle, horses and wildlife it will change this area and the living conditions dramatically. It could make it impossible to continue our current cattle operations, may make it unsafe to ride our horses, sleeping would become impossible when flight operations are present, the potential for having pictures rattled off the wall, etc. is completely unacceptable. The impact to the wildlife that we love and depend on would be greatly impacted. Our family works hard to protect the natural resources on and around our property and we rely on these natural resources to provide food and income. This would be changed forever if the HAMET Right of Way is granted.

As recently as last year, we had friends of our tell us about helicopters flying in low (50-100 feet above the ground), hovering and/or landing close to their home, and having military members

climbing in and out of these helicopters and ALL hours of the day and night. Can you imagine the fear that would come from being woke up in the middle of the night by a low flying helicopter and seeing military members climbing out and “securing” the landing zone? It would feel like World War III had begun or something similar. Now imagine you are a war veteran who had served our country admirably, been honorably discharged and who chose to move to an area of peace and quiet to forget the horrors seen in combat. To suddenly have to relive all these horrible memories and fears is a dishonor to that service member.

We have also recently been informed by the BLM, that lands surrounding our property have been designated “Foot & Horse” ONLY lands as part of an effort to minimize the impact on these lands. Some of the same lands now being proposed as landing zones for the HAMET Right of Way. I now see a double standard being set by the BLM if they are not willing to allowing us; neighboring landowners who are directly impacted and have a desire to maintain and improve the surrounding BLM properties, to even utilize existing roads in order to check cattle, fencing, etc. But then the BLM is willing to allow the military to take these same lands and turn them in to landing zones for military operations which will likely cause extreme damage to the resources (land damage; water contamination; changed wildlife behavior including breeding, calving, and wintering grounds) which directly impacts ALL the surrounding landowners is completely irresponsible of the BLM and in many ways goes directly against their responsibility to maintain the public BLM lands. In addition, there is the safety concern of all of the surrounding landowners, their cattle and property should (Heaven forbid) an accident happen. I know there is an inherent risk to all military members during these types of operations, but it is not fair to the public to expose us to these risks when we have no option to mitigate or avoid the risk.

For all the reasons stated above, I am completely opposed to the BLM granting the US Army the HAMET Right of Way in the Teller, Fremont and Park County areas. The US Army, BLM and other government agencies need to complete a search for better suited lands which will not impact 1000’s of private residents. They exist all across the Western United States and many are in close proximity to the Fort Carson Post.

Regards,

Robert & Heidi Posavad
Aspen Meadows
Guffey, CO 80820
rposavad@gmail.com
720-234-6640

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Rob Posavad



HAMET ROW Response Letter.pdf

108K



Fwd: HAMET Training Response

Verene Posavad <vposavad@aol.com>

Thu, Dec 18, 2014 at 8:43 AM

To: rgfo_comments@blm.gov

This letter is regarding information we have recently received regarding the HAMET TRAINING proposal to use BLM lands surrounding Guffey, Colorado.

As a landowner of property adjoining the BLM and Thirty One Mountain, we should have been informed of this proposal. There has been little opportunity to inquire about the plans of use, the effect on the land and on us as neighbors.

We have been told that HAMET is planning to use the BLM for multiple helicopter landings, day and night, using Thirty One Mountain as their high altitude site.

Our property is near the same level, adjoining the BLM land of Thirty One Mountain. We view it from our living room windows.

The thought of multiple helicopters flying as low as 50 feet over us day and night is a nightmare. The noise and vibrations will be constantly affecting us, our horses and cattle. It will become impossible for us to use our phones for business or safety. Sleeping will be disrupted.

As a former Navy Commander, I have seen helicopter landing areas. There was no grass or vegetation surrounding the landing zones. In these areas there were no birds or animals. It became sterile waste land.

Our property has a cattle lease and access for this BLM land attached to our deed of purchase. It will be impossible for us to have cattle grazing. They could be injured by the helicopters and certainly will be forced to run each time a helicopter is overhead. Even high flying helicopters vibrate and hurt our ears.

Recently Keith Berger at the Cannon City BLM office told us the BLM was doing a study on the effects of ATV and motor use on the BLM environment. He told us only horse travel and hiking would be allowed. If we would be riding a horse as a helicopter flew over, the horse would bolt and we would be injured.

If their effort is to protect the land and environment, how can the BLM permit noisy, vibrating, dust producing helicopters to land at any time day or night?

There appears to be other large BLM areas that may not have homes and livestock damaged. For example BLM land to the west of Black Mountain and to the South has large acreage.

There are too many private homes, landowners and a town next to the proposed sites. This activity will be a personal safety concern. It will bring unreparable environmental damage. We oppose the helicopter activity and request the other locations be considered.

Sincerely,
George and Verene Posavad

Aspen Meadows, Guffey Co 80820
vposavad@aol.com



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Hamet

Patti Von Proksch <pattivp@gmail.com>

Wed, Oct 29, 2014 at 6:13 PM

To: RGFO_comments@blm.gov, s.witcher@ccvnet.net

My name is Patricia Von Proksch and I live in the Lakemoor West valley. I'm writing this letter in regard to landing zones 701-706. I work in Colorado Springs off of InterQuest Park Way where the Air Force does flight training daily. I don't want to come home and hear flight training where I live as well. That is why I live where I do. When I come home I want to enjoy the peace and tranquility of our valley along with the wild life. We have already lost the Big Horn Sheep that use to reside in our valley. I don't want to lose any other wildlife. Plus, I am concerned with our property value and what this will do. As someone else commented I'm not sure why this training can't happen in the Pinion Valley where the Army currently trains.

Thank you respectfully Patricia.



HAMET

Wayne Ramey <wayne819@comcast.net>
To: rgfo_comments@blm.gov

Sat, Nov 1, 2014 at 1:01 PM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

My name is Robert Wayne Ramey and my wife and I own a house and property in Lakemoor West Subdivision (2937 Lakemoor Drive). While this house is our getaway house and we are only there on a part-time basis, any disturbance from the multiple flights would ruin our serenity and lower our property values to the point where we would lose our huge investment. I don't think I need to point out the many concerns that I have read from my neighbors letters and e-mails to you to describe why the plan is a terrible plan with no foresight into what ramifications will be brought to bear for the local residents. Please reconsider or, better yet drop any consideration of the BLM signing a contract with the Army for the HAMET.

Respectfully submitted,

Robert Wayne Ramey
Linda Marie Ramey
2937 Lakemoor Drive
719-689-3193
303-833-4897



HAMET - Ft. Carson/BLM POD

Rich Riley <rich.riley4@gmail.com>

Tue, Dec 16, 2014 at 1:59 PM

To: RGFO_comments@blm.gov

Cc: Leslie Riley <nlriley@msn.com>, kberger@blm.gov, nkeohane@blm.gov, annie_Oatman-Gardner@bennet.senate.gov, conductorrandy@gmail.com, deckers@co.teller.co.us, dettenriederM@co.teller.co.us, steenn@co.teller.co.us, fabianoc@co.teller.co.us, usarmy.carson.hqda-ocpa.list.pao-comrel@mail.mil

Dear Keith Berger,

I am writing to express my concern in regard to the HAMET proposal and how it will affect property values near some of the Landing Zones (LZ).

In March 2006, Captain Melissa Johnson of the USAF wrote a thesis titled, AN ANALYSIS OF USAF AIRCRAFT NOISE AND HEDONIC PROPERTY VALUES. This paper details the effect of property values near military facilities that produce high levels of aircraft noise. The property values were shown to be decreases by .5% per dB of aircraft noise. With aircraft noise being as high as 70 to 90 dB DNL from the helicopters and proximity listed in the HAMET proposal, the property devaluation from LZ 701 to 705 and LZ 410 would be substantial. The issue is that the home owners near these landing zones did not build near a military airport. They built in a very quiet rural part of Colorado near BLM land. If the BLM through the approval of the HAMET proposal devalues an individual's home, I would expect that the BLM would be liable for that devaluation. Further, the maximum frequency of training stated in the proposal is so high that it would go from an occasional nuisance to an unacceptable living situation.

It would be prudent for the BLM to, at the very least, modify the HAMET proposal to eliminate the LZ 701 to 705 and LZ410. Also, unless the training area can be created to completely eliminate helicopter noise in populated areas, the maximum number of training exercises should be dramatically reduced so as to make the training acceptable to the American citizens with property near BLM land.

Sincerely,

Richard Riley

cc: Keith Berger, BLM
Ann Oatman-Gardner (Michael F. Bennet, Senator)
Nancy Keohane, BLM
Mark Dettenrieder, Teller County Commissioner
David Paul, Teller County Commissioner
Norm Steen, Teller County Commissioner
Cory Gardner, Senator
Doug Lamborn, Senator
Ft. Carson



Fwd: Ft. Carson / BLM Helicopter Landing Agreement

Keohane, Nancy <nkeohane@blm.gov>

Thu, Jan 29, 2015 at 4:21 PM

To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: Leslie Riley <rlriley@msn.com>

Date: Tue, Oct 28, 2014 at 2:57 PM

Subject: Ft. Carson / BLM Helicopter Landing Agreement

To: "nkeohane@blm.gov" <nkeohane@blm.gov>

To Whom It May Concern,

It has just come to our attention that the BLM is considering an agreement with Ft. Carson to use BLM land off High Park Road to conduct training for pilots before deployment to Afghanistan. While we very much appreciate the need for such training to protect our troops and preserve our freedoms, the choice of the BLM land so close to residential areas is of much concern. We live in a rural, yet populous area of the county and would be adversely affected by such helicopter traffic flying around and over our homes while training exercises are carried out. High Park Road is well traveled, there is considerable wildlife in the area, and of course all the homes nearby. We would sincerely appreciate your efforts to locate the training on remote BLM lands not close to homes and roads. Thank you for your consideration.

Rich and Leslie Riley

Leslie Riley via iPad



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Ft. Carson / BLM agreement for helicopter landings

Leslie Riley <mlriley@msn.com>

Sat, Nov 1, 2014 at 8:30 AM

To: "RGFO_comments@blm.gov" <RGFO_comments@blm.gov>, Randy B <conductorrandy@gmail.com>

To Whom It May Concern:

We just became aware of the request by Ft. Carson to conduct helicopter landing exercises on BLM land, including the BLM land on High Park Road near Lakemoor West, Beartrap and Navajo Mountain Mesa. We understand you are soliciting neighborhood comments about these exercises.

We have owned our property on Navajo Mountain Mesa since 1991. It is a lovely, tranquil place, the ambience of which will be totally destroyed if these helicopter exercises take place near us. In addition to the impact on us and our neighbors, and the area wildlife, High Park Road is well-traveled, and such aerial traffic could produce accidents. Many of the homes in the surrounding areas also have cattle, horses and other livestock which would be affected.

We deeply appreciate the service the military is doing to protect our freedoms and want them to be prepared when they go to war, but we can't believe better landing sites away from homes, subdivisions and wildlife can't be found, and we urge you to look at BLM land that is more remote for these exercises.

Thank you for your consideration.

Rich and Leslie Riley
Navajo Mountain Mesa

Leslie Riley via iPad



Fwd: HAMET - Ft. Carson/BLM POD

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Sat, Dec 6, 2014 at 11:49 AM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: **Leslie Riley** <nlriley@msn.com>
Date: Sat, Dec 6, 2014 at 11:30 AM
Subject: HAMET - Ft. Carson/BLM POD
To: rich.riley4@gmail.com, RGFO_comments@blm.gov, kberger@blm.gov, nkeohane@blm.gov, annie_Oatman-Gardner@bennet.senate.gov, conductorrandy@gmail.com, deckers@co.teller.co.us, dettenriederM@co.teller.co.us, steenn@co.teller.co.us, fabianoc@co.teller.co.us, usarmy.carson.hqda-ocpa.list.pao-comrel@mail.mil, nlriley@msn.com

December 6, 2014

Subject: HAMET – Ft. Carson/BLM POD

Thank you for holding the meeting at the Cripple Creek Heritage Center last Thursday, December 4, 2014. It was informative and helpful to have a public forum.

We live on Navajo Mountain Mesa near Lakemoor West, near one of the proposed BLM sites. This BLM site has at least 6 helicopter landing zones (HLZs) and the highest density of people and closeness of landing zones to homes in the POD. Friends living in Lakemoor West are even more directly impacted by the POD.

We, as many others also mentioned at the meeting, respect the military, the job they do, and their need to train. However, we question the choice of some of the landing zones around such populated areas.

Issues and Concerns:

Two possible legal issues: 1) whether BLM has the authority to permit right-of-way to Ft. Carson to use BLM land for helicopter landings and 2) whether Ft. Carson is proposing something illegal with military maneuvers on BLM land. If these legal issues are valid and sorted out, perhaps HAMET in Teller, El Paso and Park Counties on BLM land will not even be allowed.

Why did the Forest Service kick the military and their training off their lands, forcing them to seek other places to train?

With the cost to taxpayers of approximately \$25,000/hour of helicopter flight times, why the redundancy of training here as well as in Lincoln, New Mexico, with attendant expenditures on impact studies?

It seems the maps used to select helicopter landing zones are outdated and do not take into consideration the population and density of homes in some of the HLZs, particularly #410, 701-705.

Liability issues: who pays for decreased property values, health issues, tax decreases, and emergency responders in the event of an accident?

The impact of the "casual" use since 2010 and the lack of attention or regard to complaints since this casual use (no approval needed) was instituted.

What about other HLZs further away from populated areas?

The care and concern of the people along 4-Mile Creek and all the conservancy easements that have been obtained to preserve our way of life in the valley.

The potential conflict of airspace between Flight for Life helicopter rescue flights and military helicopters.

The "looky-loo" syndrome with landings along High Park Road (Teller County Road 11) which is highly traveled and already experiences minor fender-benders with the average of 4 flights per month by Flight for Life helicopters.

Why do an EA instead of an EIS when there is such impact on wildlife, breeding grounds and the neighboring cattle ranches?

We live in a very dry area with a high fire danger.

It would be one thing to have Ft. Carson and their soldiers do training in Colorado, quite another to add other military branches to rotate in and out to do their training here with attendant increases in the number of flights and impact.

The Army has requested an exceedingly high number of flights per landing zone at all times of the day and night. We were assured in the meeting that there would never be that many, it was an inflated number. This number of flights is beyond a casual inconvenience tantamount to living near an airport.

The radius of the landing zone for low level flights is 1000 meters, with the HLZs encompassing a large number of homes. The implication is that it is OK for helicopter pilots to fly directly over the roofs of several of these homes. This has to be adjusted. No United States citizen should be expected to endure that kind and amount of air traffic.

Invite reps from BLM, the military, politicians and media on the ground (in and around HLZs) while training sessions take place to show the impact to the neighboring homes.

The flight altitude (25 to 80') and proximity to neighboring homes and developments with noise at or above 90 dB will disturb residents, domestic animals, livestock and wildlife. There would be damage to homes with the rattling of structures with low-flying helicopters.

We request respect for personal property and privacy of people living near the HLZs.

Communication about review and appeal processes and public meetings must be handled better. In addition to newspapers articles and press releases and sending emails out to attendees, contact POA leadership to publicize meetings and offer ways to protest what is going on via BLM and military websites.

Of course, our government could just end the wars, as promised, and this training would be unnecessary.

Thank you for your consideration of this email. We sincerely hope it is still early enough in this process to make needed adjustments to make this a win-win situation for ALL concerned. As one attendee said at the meeting "that sound is the sound of freedom" but does that mean we must lose our freedoms to such an intimate, long-term intrusion on our lives?

Rich and Leslie Riley

cc: Keith Berger, BLM
Ann Oatman-Gardner (Michael F. Bennet, Senator)
Nancy Keohane, BLM

Mark Dettenrieder, Teller County Commissioner
David Paul, Teller County Commissioner
Norm Steen, Teller County Commissioner
Cory Gardner, Senator
Doug Lamborn, Senator
Ft. Carson



Comments on Fort Carson training on public lands

rmlwp74@aol.com <rmlwp74@aol.com>

Mon, Dec 8, 2014 at 4:55 PM

To: rgfo_comments@blm.gov

Concerning Fort Carson training on public lands:

We live in the forested community of Crystal Park in El Paso County. Our main concern is fire. For Fort Carson to use Public Lands for training, I have two requests.

First, if during training a fire is started on public land, I want a plan already to be in place and on public file as to how the fire will be responded to and how it will be contained.

On days when the winds are high and/or for whatever reason the fire danger is rated by the Forest Service and/ or the BLM to be at high risk, I want all training to cease until the conditions change to more acceptable levels.



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Training area

Paul Roy <paulbriamroy@gmail.com>
To: rgfo_comments@blm.gov

Fri, Oct 31, 2014 at 4:19 AM

Hello my name is Paul Roy I own 104 acres up by skaguay reservoir and I am very opposed to any activity that creates noise and interrupts the balance of my land. And the proposal does just that. It was by chance a friend of mine had seen this. As a landowner it would of been nice to have been notified of this proposal. I am against this proposal



HAMET

Michael Ryder <onedreamlz571@yahoo.com>

Fri, Dec 19, 2014 at 1:51 PM

Reply-To: Michael Ryder <onedreamlz571@yahoo.com>

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Hi,

My wife and I are against the proposal in **HAMET**. **We have lived in areas where similar exercises by the military were performed. There would be significant noise annoyance in a peaceful area and the values of our homes will be greatly reduced. We are trying to sell our home and HAMET would cause a very significant financial loss to us.**

Also is of concern in the event of a helicopter crash resulting in a forest fire there are not sufficient resources to protect our homes. Hunting would also be impacted.

Please do not share our personal information.

Michael and Kimberly Ryder

571 Coyote Dr.

Guffey, CO 80820

719/479-4080



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET on BLM lands

Mark Sacco <markjsacco@hotmail.com>

Tue, Oct 14, 2014 at 8:58 AM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

I live here in Colorado and very near BLM land area you are talking about. I moved here to get away from the noise of the world to retire, to enjoy the wild life and live a quite life. We have already experienced Helo activity and the noise of it in the past and I do not want this noise in my area. As much as I support the work our military I do not want any of this activity around us, because I know it will make it miserable up here with the noise, it will effect the animals around here and I just don't think it is necessary. I strongly do not want this in our area.

Mark Sacco



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Helicopter training

Mark Sacco <markjsacco@hotmail.com>

Fri, Dec 12, 2014 at 10:15 AM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

To Whom it may concern,

I am writing you about the planned Helicopter training on BLM land around me. I am opposed to this for multiple reasons. I moved to this area for the quite and we already have some helicopters that train in this area which is more than I want to hear and I don't want to hear them 24/7. Now increasing this for 10 years is not what I signed up for. This will disrupt us, the animals in the area and the disruption on the soil with foot print left. We have BLM laws that do not allow vehicles on these lands for a reason and now we are going to leave tire prints from helicopters, not right. I see not benefit to this just negatives. I have invested everything I own into my property and can not move from here nor do I want to. Practice on the land you have a Fort Carson. I want to maintain the peaceful and unspoiled BLM areas that I moved here for. You guys will run all the animals out of here.

Please reconsider.

Mark Sacco



HAMET

Janis Schiller <janis16622@hotmail.com>

Fri, Oct 31, 2014 at 9:24 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

October 31, 2014

Dear Sir/Madam,

I am writing in response to the call for public comments on the proposal by Fort Carson to use public lands for military helicopter training. My interest in this matter arises because I spent a significant part of the year in a location that has MTA's to the east, west, and south (Wapiti Drive, Canon City, CO 81212).

To begin, I like to bring up the mission of the BLM:

The BLM's mission is to manage and conserve the public lands for the use and enjoyment of present and future generations under our mandate of multiple-use and sustained yield.

This worthwhile mission should be the context to analyze and make decisions on the Fort Carson Plan of Development. I strongly agree that "multiple-use" also includes providing opportunities for the U.S. Army for high altitude mountain training. Given this, I find that the 2013 Casual Use Letter balances in an exemplary manner the U.S. Army need with the various other uses and needs of the BLM land in Park, Teller and Freemont County. Included in the Casual Use Letter are meaningful restrictions and safeguards with respect to

1. Reporting on use
2. A limited number of LZ's
3. A limited number of landings
4. Limits on dates of use
5. Complaint management
6. Fire concerns
7. Periodic reviews

The Fort Carson Plan of Development for the BLM to issue a Right-Of-Way (ROW) grant will put an end to the balance so clearly present in the Casual Use Letter, at the expense of wildlife, nature, livestock, ranching, and area inhabitants. In fact, issuing the proposed Right-of-Way grant will prevent the BLM from fulfilling its mission by rescinding too much control over the land, and would turn the BLM lands into a de-facto expansion of Fort Carson, and ensure that this public land will gradually become 'less public'.

Clearly, the noise of the low flying helicopters is disturbing and disruptive for both wildlife, livestock, and humans. Permitting a large increase in the number of LZs, the number of landings, and no limits on the dates will greatly increase the amount of low flying helicopter traffic, both in the proposed MTA areas and the private

lands whose air space is used to traverse from one MTA to the other. This summer, I witnessed such activity on several occasions, and while I have no objections to occasional usage, I strongly feel that an escalation to the proposed level would be excessive.

Additionally, I am concerned about the impact that low-level flights will have on local vegetation and the smaller animals that inhabit these environs. While these smaller animals are not as 'flashy' as the elk, bighorn sheep, etc., they nevertheless play a crucial part in the overall ecological balance of the area. This mountain area is a fragile environment, slow to recover from repeated disturbances. The High Altitude Mountain Environment Training proposal involves repeated activities at very low levels – mere feet off the ground in some cases. I am concerned how these activities, multiple times a day, will affect the areas involved, both short term and long term. One concern in particular is the statement in the Fort Carson's Plan of Development: "Landing Zones will not be used when humans, livestock or wildlife (particularly big game, elk, deer, antelope, and bighorn sheep) are present." However, it is not just the small LZ's that matter with low flying helicopters; also the presence of humans, livestock or wildlife in the areas surrounding the LZ's should be taken into consideration.

I would like to see that BLM comes to an agreement with Fort Carson that addresses the seven items of restrictions and safeguards mentioned above. The ultimate control should remain in the hands of the BLM, so as to fulfill the BLM's Mission, to assure a balanced use of the land, and, last but not least, to take corrective measures when needed and when existing agreements are not adhered to.

In closing, I would like to commend the BLM for the work it does and its efforts to ensure "that the nation's public lands are managed and conserved for future generations of Americans to use and enjoy."

Yours truly,

Janis Schiller

210-286-1113, janis16622@hotmail.com

16622 Worthington, San Antonio, TX 78248 and

1017 Wapiti Drive, Canon City, CO 81212



BLM Helicopter Landing/Take off

Lora Gail Schleicher <lgslorie@mesanetworks.net>

Fri, Oct 24, 2014 at 9:25 AM

To: RGFO_comments@blm.gov

Cc: Steve/Sandy Witcher <s.witcher@ccvnet.net>

To Whom it May concern,

We are residents of Lakemoor West Ranch in Florissant. The Courier News has brought to our attention that Fort carson would like to do helicopter training on the BLM land located right next door to our valley, which in our particular case is right above our house!

I know a couple of years ago they were doing this training and it was extremely annoying. We would have these helicopters right, directly above our house at all hours of the day and as late as 11:30 pm at night. They would even be so close that we could tell you what the pilot looked like. We live in this rural area for a reason, to escape from the noise of the city and in this case the military, and we truly enjoy our wildllife in this valley. It completely disrupts our wildlife.

The BLM is so vast why in the world would you choose to train in a neighborhood? I could drive you around and show you very remote areas in our BLM land system that you could accomplish this need for training. Yes, we get it's for the protection of our Country but we also know that our military has access to this terrain of land nationwide, so please be very selective of where you choose to train and not over our heads here in Lakemoor West in Florissant, CO.

Thank you and we appreciate your consideration in this matter.

Bob and Lorie Schleicher



Canyon Springs Ranch MTA

Schultz <schu75@comcast.net>

Wed, Dec 17, 2014 at 5:50 AM

To: rgfo_comments@blm.gov

Don and Leslie Schultz

11222 Delmar

Richland, MI 49083

December 10, 2014

Ms. Nancy Keohane

NEPA Specialist

Royal Gorge Field Office, Bureau of Land Management

3028 East Main Street

Canon City, CO 81212

Transmitted via email to: rgfo_comments@blm.gov

Dear Ms. Nancy Keohane:

My husband and I purchased land In Canyon Spring Ranch (CSR) almost 14 years ago in anticipation of our retirement and subsequent move. We visit our property annually, planning where the house will go, hiking the acreage and sitting on "our" rocks. Imagine our distress when we discovered that there could be helicopters flying 500' over our heads day and night, scaring the wildlife, limiting our hiking grounds and polluting our peace and quiet. A major factor involved in our decision to purchase this particular piece land was the BLM land adjacent to it, lending us an increased bumper from civilization and additional property for exploration.

If we were to decide this is no longer an area we want to inhabit as a result of this military expansion and were to attempt to sell our property, I'm sure there would be few buyers for the land. Not only will our dream be gone but so will all of the money we have invested into our lot at CSR. This money includes the purchase price, annual dues and taxes and the cost of running electricity to our property.

I am writing to encourage you to reconsider the location of the proposed sites for MTA based on the Canyon Springs Ranch development and the surrounding area being a populated area. The installation of a helicopter training site in the near vicinity will put an end to the neighborhood and will render the BLM land inaccessible to hunters, hikers, campers, and other taxpayers. The existence of the helicopter training facility will inhibit the economic growth in the region. The building process would bring a significant amount of revenue to Fremont County. In addition, the increased population would be purchasing groceries, gas, attending school, vacationing, etc. locally.

It seems unlikely to me that vacationers will be interested in visiting the Red River Gorge, camping at the local campsites, biking the wilderness trails, hunting, fishing, and kayaking with helicopters buzzing overhead and with a high DB level frightening wildlife.

Pending the inability to relocate these facilities, I'm sure you are considering the purchase of all properties in the subdivision at a fair price. While this is not our wish, if plans for the helicopter training area go forth, we will not be interested in living in CSR and would welcome the purchase.

Sincerely,

Don and Leslie Schultz



Hamlet comments

Travis Scott <travis.harleyhummernut@gmail.com>

Tue, Dec 16, 2014 at 10:56 AM

To: rgfo_comments@blm.gov

To whom it may concern,

I am a resident of rural Guffey, Co. And I am writing to add my comments to the public comments on this HAMLET issue.

These helicopter training missions being performed in a rural populated area are extremely UNSAFE, UNNECESSARY AND TOTALLY IRRESPONSIBLE ! Especially when Colorado has literally millions of UN-inhabited acres that would be more suitable for any such operations.

In a time when our military is already getting much criticism over many other issues it seems counterproductive and idiotic to preform these maneuvers in a populated area and continue to cause cattle, horses and other livestock as well as wildlife to stampede and become injured. Not to mention the invasion of all the citizens privacy and quite that live here.

Deeply concerned citizen,

Travis Scott
Guffey, co. 80820



Re: proposed landing zones.

N2mules2@aol.com <N2mules2@aol.com>

Thu, Dec 4, 2014 at 10:29 AM

To: blm_co_rg_comments@blm.gov

Hello Nancy

Thank you for your quick response...I respect that this is all in planning stages...
One very important consideration that needs to be addressed is the Water and fire issue...depending on where these areas arewater for fire protection is a limited resource and access to get equipment in is limited. Logging has already destroyed much of the BLM. Also, EMS is a difficult situation in areas...
Please consider these factors as well.

Thank you again.

In a message dated 12/4/2014 9:11:00 A.M. Mountain Standard Time, blm_co_rg_comments@blm.gov writes:

Dear Ms. Sellen,

Thank you for your comments. We welcome your review of our BLM HAMET website that addresses this proposal in more detail at <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>. I wanted to make sure you also know that we are hosting a public meeting tonight in Cripple Creek at the Heritage Center from 4:30 - 7:00. The press release for the public meeting is on the website. At this point in the process what the Army has asked for is a proposal and the BLM is evaluating that proposal through the National Environmental Policy Act as required by law. Your comments are important during this process. Thank you, Nancy

On Thu, Dec 4, 2014 at 7:48 AM, <N2mules2@aol.com> wrote:

BLM

To: whom it may concern

I am concerned about the proposal for landing zones in Fremont county. I believe this would negatively affect property values.

Citizens move to rural areas to escape the noise and congestion of city life.

It is already very disruptive to peoples lives to have helicopters flying over at all hours of the night.

I am also concerned about the secretive nature of this proposal.

These training missions are important but that's why we pay millions of dollars for military facilities. The military also have access to local airports.

This would also affect the wildlife.

Please do not allow this commercial/military activity in a residential area.

Thank you
Martha Sellen



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Hamet

Matt Sharpe CSW <ctsmattsharpe@gmail.com>
To: rgfo_comments@blm.gov

Fri, Dec 19, 2014 at 1:54 PM

I Oppose!

—

Matt Sharpe CSW
Director of Sales
CTS Distributing
(303) 393-7393 office
(303) 882-3723 cell
ctsmattsharpe@gmail.com



HAMET Comments

sandy sickafoose <eagle1623@hotmail.com>

Tue, Dec 9, 2014 at 7:55 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Dec. 9, 2014

Hello Nancy,

Our names are Mike and Sandy Sickafoose and we own two ranches here in Florissant, one is 2100 High Park Rd which we live at, and the other is next door at 2204 High Park which we lease to a Christian Ministry that sponsors missionaries and Pastors as a retreat. We have lived here for 4 years, since 2010. During that time we have had many encounters with helicopters from Fort Carson and other bases in the U.S. such as Kentucky in particular.

One instance we had was when the Kentucky soldiers were training in our area with the helicopters. My husband and I were living at the 2204 address while our home on 2100 was being built. We were asleep when at 11:30 one night there was a bright light shining on our faces thru the skylight over our bed on the second floor. The house shook terribly and there was also a very loud noise above the house. It was a helicopter hovering over our house at no more than 50 feet over the house shining its spotlight thru the skylight. They hovered there for about 15 minutes and was still there when I called the helicopter unit at Fort Carson. My husband could read the numbers under the aircraft and reported what he read to the officer in charge. This incident was being recorded by Fort Carson and can be verified by Public Relations at Fort Carson. When we had our meeting at Victor we relayed this story to the General that was attending the public meeting. We asked him at that time whether or not he knew that 50 feet to the north of the house there was a solar windmill....did the pilot that night know that it was there? No he didn't and had that helicopter veered north of the house rather than going south he would have hit the windmill with disastrous consequences to the surrounding structures and even our house....we could have been killed!

There were numerous times the helicopters have been a mere 20-50 feet off the ground and a few times at eye level from our sofas in our living room....we could see their faces. They have buzzed our homes and our livestock sending them running wildly in different directions just to get away. That was during the day....then they would be buzzing our house at 10 p.m., 11:00 p.m., many times thru 2 a.m. Personally, I felt that the pilots were just being hot shots, especially the Kentucky contingent, and not respecting the altitude they should have been flying at especially around buildings and at night they can't see the livestock they are flying over.

We own cattle, horses, goats, chickens. Last week a Huey was flying at about 2000 feet above our ranch and I watched as my horses panicked from the noise and ran wildly away from their stalls. The Huey was flying to somewhere and that was ok...not flying back and forth over our property as the HAMET helicopters do in training.

I am also aware that a catastrophic incident can happen when a helicopter is between 7000 - 8000 feet....something akin to a wind shear, was what I was told by a helicopter pilot. It's a very dangerous action resulting in the helicopter losing control and crashing.

Cows are easily stressed by low flying aircraft causing lactation problems, calving issues, breeding issues....the same applies to goats.

Then there is the human toll....quality of life for us and our neighbors. Don't get me wrong, I love and support our military. I have a son-in-law in the middle east serving our country. I want our soldiers to be safe and trained well. My question is....there is soooo much BLM around that is away from populace....why here?

I also have a medical condition that cannot handle stress....Multiple Sclerosis. We moved here for the peace we find here in the countryside of the Rockies. We didn't anticipate that our immediate area would be turned into a literal airport of take-offs and landings.....8000 a year! Why are the LZ's so close to peoples homes? and yet there is expected catastrophies with the helicopters and property out here....which brings another point....our grazing land for our animals. Should a helicopter go down that would result in fires , that could be catastrophic to landowners who rely on income from breeding and raising cattle.

Is there not some compromise that can be made here? From what I gathered at the meeting we had in Cripple Creek....it already sounds like a "done deal".

Please consider our comments before making any decisions.

Thank you,
Mrs. Sandy Sickafoose

719 685-6547
2100 High Park Rd. aka County Road 11
Florissant, Co. 80816



Sangre de Cristo Group

P.O. Box 8821 Pueblo, CO 81008-8821

Reply to

Office of the Chair

140 West 29th Street, #348 Pueblo, CO 81008-1034

719-561-3117 253-295-0998 (fax)

ross.vincent@sierraclub.org

December 19, 2014

Nancy Keohane
NEPA Specialist
Bureau of Land Management
3028 East Main St.
Canon City, CO 81212

Submitted via email to rgfo_comments@blm.gov.

Re: Scoping Comments for Bureau of Land Management/Department of Defense HAMET Project

Dear Ms. Keohane,

The Sangre de Cristo Group (SdCG) of the Sierra Club Rocky Mountain Chapter submits the following comments concerning the Bureau of Land Management (BLM) scoping process for the proposed High Altitude Mountain Environment Training (HAMET) program. The SdCG actively represents Sierra Club members and supporters in south-central and south-east Colorado, including people who visit and enjoy the landscapes proposed for the HAMET program. As such, the SdCG has a vested interest in this proposal and its effects upon people, wildlife and wild places.

First, the HAMET project's Plan of Development (POD) encompasses public lands with sensitive resources. Furthermore, significant environmental impacts are likely to occur in connection with the project. As such, the SdCG requests that an Environmental Impact Statement (EIS) be prepared.

Second, HAMET analysis cannot take place in a bubble. The project is intricately connected to several other military projects and proposals affecting southeast Colorado. These include proposed activities at Piñon Canyon, the Programmatic Fort Carson Aviation Brigade Stationing Implementation and PCMS Environmental Assessment, proposed development at Bullseye Auxiliary Airfield, and the development and use of any other training, storage and maintenance sites that may be associated with these training activities. The impacts of HAMET and these other actions must be considered cumulatively. In addition, direct, indirect and cumulative impacts from HAMET and other proposals must be considered in relationship to noise, dust, wildlife, endangered species, water, air quality, vegetation, recreation, land use, cultural resources and biological resources.

Page 2 – HAMET Comments

Third, the BLM and the DOD are required by NEPA to consider alternatives to the project. The SdCG requests a complete range of alternatives, including one that that avoids the appropriation of public lands for military use altogether.

Thank you for the opportunity to comment.

Sincerely,

R

Ross Vincent, Chair
Sangre de Cristo Group
Sierra Club



RE: Fort Carson request(s) for ROW to be used for HAMET

Kenneth L Smith <ken@tellercanyon.com>
To: RGFO_comments@blm.gov
Cc: Ellen Van Landingham <ellen@ekrus.org>

Wed, Oct 29, 2014 at 1:34 PM

TO:

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212

Nancy,

My name is Kenneth L. Smith. My wife Ellen and I are full-time residents in the house we own at 3396 Lakemoor Dr (CR 113, Teller County). The 700-series LZ's are all within a mile or so of our house.

I'm sure that you've received a number of very negative comments from the usual suspects in our neighborhood with regard to Ft Carson's need for LZ's and NOE training space at altitudes above 7000ft. Ellen and I are of the opinion that the Army's request in this regard should be granted.

We really have only one concern based on the period 2012-2013 when on several occasions, all after dark (one of them at approximately 1am), aircrews flew NOE near our house. By near I mean within 150 yards of it. Our house is approximately 80 feet above and approximately 100 yards west of Lakemoor Drive. There is a ridge line approximately 150 yards to the NNW of our house.

On one occasion, at approximately 10pm, a helicopter which based on sound and navigation lights I think was a Huey flew south to north above the road at about the height of our house and continuing along the road to the north past a house on the other side of the road which is only about 75 feet east of the road. On another occasion, a helicopter (at approximately 1-2am) descended NOE to the road between our house and the ridge to the north. Both maneuvers occurred without incident although the one after midnight occurred when both of us were sleeping in our BR at the north end of the house with the window open and were awakened with some concern about the nearness of the aircraft to the house. Our concern is that it seems unwise for aircrew to fly NOE near or in built up areas!

Having said that, it's evident to us that the incidence of what I view as poor judgement on the part of flight crews is relatively minimal. Never-the-less, we are of the opinion that even the two incidents mentioned above should not have occurred and shouldn't occur in the future.

In summary, we recognize the fact that HAMET is essential and, with the exception of the above concerns, are entirely happy to hear what we refer to as "the sound of freedom" while enjoying the airshow.

Hopefully, BLM will be able to approve Ft Carson's request for ROW and the aircrews will use care and common sense during their training flights.

We wish nothing but success and safety to the brave men and women who risk their lives in the defense of our nation!

With Best Regards,
Kenneth L. Smith



HAMET

EDWARD <welcome2thewildlife@centurylink.net>

Mon, Dec 15, 2014 at 11:52 AM

To: rgfo_comments@blm.gov

December 15, 2014

To: Keith Berger/Nancy Keohane

BLM Royal Gorge Field Office

From: Ed and Michelle Speck

54 Carlton Circle

Florissant, CO 80816

As a retired Navy veteran with 27 years of service, I support the military and the need for training, but we have some concerns about the HAMET proposal:

- 1) The effect on wildlife and the environment. Much more research needs to be done before irreparably damaging our delicate ecosystem.
- 2) Pathway of flights -- can it be placed in a less populated area or one that would have less consequences. Our area has been seriously affected by fires in Waldo Canyon, Black Forest, Springer, etc., and consequent flooding.
- 3) The possibility of crashes and forest fires, endangering our forests, homes and lives. We are also concerned about the associated expense for our local fire departments and counties.
- 4) The quality of life will be significantly affected by the noise and activity. The wildlife,

peace and quiet will be gone.

5) The negative effect on tourism for Cripple Creek, and our national and state parks.

We appreciate your attention to these matters and would like to be advised of any further meetings or information.

Sincerely,

Ed and Michelle Speck



Army High Altitude Helicopter Training.

Jon Stenstad <jons@natbrokers.com>

Thu, Dec 11, 2014 at 4:25 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

I live in Teller County.

Absolutely oppose it.

We are tired of the noise and low fly by.

First of all, as US forces withdraw from Afganistan, there should be a dramatic reduction in the need for US Air in the region.

We oppose due the absolute noise, damage to humans and wildlife.

There is no need for this activity here.

The US Army has plenty of terrain of their own to train in without adding landing zones in our National Forest.

The National Forest/BLM lands are for the public to enjoy, not for the military to destroy.

We ask that you oppose any extension of Hamet.

Please cancel their use.

Jon Stenstad

Regional Sales Manager

National Brokerage, LLC

<http://www.natbrokers.com>

6225 N. Meeker Place, Ste. 100

Boise, ID 83713

Phone: (800) 377-6344 x1224

Fax: (208) 472-3438

Direct (Voice): (208) 350-7977

Direct (Fax): 208-319-2043





HAMET

Elizabeth Stephens <97kiowacreek@gmail.com>
To: rgfo_comments@blm.gov

Mon, Dec 15, 2014 at 1:01 PM

I live and work in these areas. We live here for peace and quiet. There are enough outside sources of disturbance to our peace. Please do not invade our area with additional military training exercises.

Elizabeth Stephens



STONE RANCH

Howard and Barb Stone
8292 CR 1
Florissant, CO 80816
(719) 689-2277
hvbarranch1@aol.com

RGFO

Nancy Keohane, BLM
rgfocomments@blm.gov

RE: Fort Carson/BLM Contract
HAMET

We are one of several working ranches in Teller County located along the 4-Mile corridor. We are a cow-calf operation and raise hay on our native grass meadows.

We are very concerned about Fort Carson's proposal to increase their HAMET operations in Teller, Fremont, and Park Counties. The casual use of the BLM for MTAs and LZs has been intrusive and objectionable to the residents of the 4-Mile area, and particularly to Lakemoor West and Guffey residents. The proposal to increase the intensity of the military training is frightening. The sound of helicopters flying low and landing many times during the day and night is disturbing to we who reside here, and the negative impacts to the area would be enormous.

Beginning with the acquisition of ranch land on upper 4-Mile Creek by the Nature Conservancy in the early 1970s that eventually became part of Mueller State Park, the 4-Mile area has been essential to the preservation of land, wildlife, agriculture and the intrinsic values that are inherent with the protection of these resources; scenic vistas, open meadows, grazing animals, wildlife viewing.

In the 1990s a local residents group, the 4-Mile Regional Planning

Committee, further recognized the need to preserve and protect the 4-Mile area's rural lifestyle and developed and submitted a plan to Teller County to stop commercial development, high density mobile home parks, apartments, duplexes, PUD's, etc.

Palmer Land Trust also promoted land preservation in the Pikes Peak and 4-Mile Creek areas designating them as high priority to protect from development. Conservation plans and goals were identified and conservation easements were implemented beginning with our ranch. Many organizations and trusts such as GOCO (Great Colorado Outdoors), The Colorado Conservation Fund, Rocky Mountain Elk Foundation , Colorado Cattlemen's Agricultural Land Trust, Land Trust of the Upper Arkansas donated monies to help fund these easements. There are now approximately twelve conservation easements on ranches and larger pieces of property in the 4-Mile Creek corridor, protected in perpetuity for all to enjoy. Most of the easements are livestock operations.

Many low flying aircraft will move wildlife, unsettle cattle, frighten horses, disrupt flight patterns of eagles, herons, geese and migratory birds that use the wetlands of 4-Mile Creek. The loss of wildness, serenity, solitude, and property values will be real.

The image of busy skies filled with huge military helicopters and planes flying and landing over lands conserved and protected by land owners and over residents' homes is grievous. The Gold Belt Scenic Byway running through much of Teller and Fremont Counties will be negatively impacted as well. An airport is incongruent over land preserved and over an area protected for rural living.

We honor our armed forces. They protect us everyday. We want our soldiers to have the best training in the world. We believe there is a better, more isolated piece of ground on BLM that would serve the purpose they are looking for.

In closing, we respectfully request that you suggest an alternative area for the HAMET and reject the proposal from Fort Carson.

Sincerely,

Howard Stone

Barb Stone



HAMET

Diane Strong <dstrong1now@gmail.com>

Wed, Dec 17, 2014 at 11:44 AM

To: rgfo_comments@blm.gov

Hello,

I know that are military is an important part of the safety and survival of our precious country, I had a son and daughter-in-law serve in Iraq. With all that said, I am against the proposed Military Training area that is in the Fremont, Teller and Park County areas. People from all over come here to buy Mountain property to have a place of peace and serenity, their own little part of the Colorado Mountains. The Training area in their back yards would be such a disgrace and dis-service to all the current land owners and the ones that have been considering the area.

I'm sure that the areas that the Military have already are sufficient or that there are better places to have a training area.

Thanks for your time in the matter.

Thanks,

Have a blessed day

Diane



Re: HAMET

Jim Sturgeon <jim.sturgeon71@gmail.com>

Thu, Jan 22, 2015 at 4:07 PM

To: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

Thanks!

Jim and Irene Sturgeon

On 1/22/15, RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov> wrote:

> I will add you to our HAMET contact list. We will be back in touch as soon
> as we have news or something to review.

>

> On Mon, Jan 19, 2015 at 1:24 PM, Jim Sturgeon <jim.sturgeon71@gmail.com>

> wrote:

>

>> My wife and I have 153 acers with State land to our North, BLM land to
>> our West and South. We not only support the military to use BLM, but
>> want you to know that they are welcome to use our property too!

>>

>> Jim and Irene Sturgeon

>> 3583 Park County Rd #102

>>

>



HAMET in Park County

Scott and Beth <scottandbethsund@yahoo.com>

Thu, Dec 18, 2014 at 1:36 AM

Reply-To: Scott and Beth <scottandbethsund@yahoo.com>

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

To whom it may concern,

I am a landowner in the Four Mile area and am adamantly opposed to military helicopters disturbing the peace and quiet of our property, which is why we bought it. Low flying blackhawks and other military vehicles will invade our privacy, upset wildlife, and upset the tranquility of the land. Fort Carson has 137,000 acres of land to practice on... let them practice there. I only have 20 acres and I'd like it to stay the way it is now, secluded and quiet.

I vote NO to HAMET training in Park county.

Scott Sund

sbsund@msn.com



HAMET

Joe Tanis <jtanis@msn.com>
To: rgfo_comments@blm.gov

Fri, Dec 12, 2014 at 1:12 PM

Dear Nancy,

Thanks for giving us the opportunity to voice our opinion!!! I would like to state that the landing zones near homes, and the low-level flight paths over them, should be modified or not approved at all. The impact to local real estate values would very negative. I have sold several homes in the Lakemoor Valley Subarea and everybody seems to be very upset over this matter.

Thanks for your consideration and Merry Christmas!!!

Joe Tanis

Tanis Team

Re/Max Performance, Inc.

Direct 719-687-4750

1-800-748-3801 ext.150



Helicopter Training on Public Lands

Paul Tanner <tancol@bresnan.net>

Fri, Oct 3, 2014 at 8:53 AM

To: rgfo_comments@blm.gov

Subject: Comments on Fort Carson's proposal to use public lands for military helicopter training.

Date: October 3, 2014

The Department of Defense is the third largest land holding agency in the Federal Government with 30 million acres. With that type of land holding base, there is no reason for them to come to the BLM and ask to utilize their lands for training of any sort. And while I'm sure the BLM wishes to appear patriotic and cooperate with the Department of the Defense in allowing the proposed HAME Training on public lands within the Royal Gorge Field Office boundaries, the Federal Land Policy and Management (FLPMA) act of 1976 [Sec. 302. [43 U.S.C. 1732 (b)] states very specifically that, "...unless otherwise provided for by law, the Secretary may permit Federal departments and agencies to use, occupy, and develop public lands ONLY through rights-of-way under section 507 of this Act, withdrawals under section 204 of this Act, and, where the proposed use and development are similar or closely related to the programs of the Secretary for the public lands involved, cooperative agreements under subsection (b) of section 307 of this Act".

Obviously neither the BLM nor the Department of Defense wishes to go through the withdrawal process for this proposed use of the public lands. The only way a cooperative agreement can be utilized is where the use is similar to or closely related to BLM programs, i.e. search and rescue. Granting of a Right-of-Way has been suggested and under FLPMA section 507. [43 U.S.C. 1767] (a) the BLM can grant any department or agency of the United States a right-of-way over, upon, under or through BLM land, subject to any terms and conditions the BLM chooses to add. However, a right-of-way should not be a proper method of authorizing the proposed HAME use of public lands. FLPMA Sec. 501. [43 U.S.C. 1761] (a) and BLM Manual 2800 states that the BLM will use a ROW grant to authorize the use of public lands for systems or facilities that include:

1. Reservoirs, canals, ditches, flumes, pipelines, tunnels, and other facilities and systems which impound, store, transport, or distribute water;
2. Pipelines and conveyor belts for transporting and distributing solid materials;
3. Systems for generating, transmitting, or distributing electricity;
4. Systems for transmitting or receiving voice or electronic signals used for communication;
5. Transportation systems such as roads, trails, highways, railroads, canals, tunnels, tramways, airways, and livestock driveways, and
6. Any other system or facility for transportation, communication or other similar purpose over, upon, under or through public lands.

So it isn't readily apparent how helicopter landing sites can be viewed as a system or facility that would meet the above descriptions.

The military has been utilizing several landing sites on public lands under the BLM's pretense that it is somehow "Casual Use" even though "Casual Use" is not one of the options specifically laid out in Sec. 302 (43 U.S.C. 1732 (b) of the FLPMA. The military's Plan of Development for future HAME discusses the frequency of sorties it plans under Tenant Unit training and Non-Tenant training. Tenant Unit training is to involve continuous training throughout the year with minimum usage projected to be 700 landings per year which, if each landing zone was used equally, would average out to 16 landings at each LZ each year. Non-tenant Unit training would evidently be more seasonal with maximum usage projected to be 1440 landings per year per landing zone. The two together add up to 1456 landings per year for each LZ or 121 landings per month or 4 each day on each designated LZ. The document goes on to state that there will be a half hour stay at each LZ for each sortie, or two hours each day at each of approximately 40 Landing Zones with a running helicopter on the ground. Under the most liberal interpretation possible of Casual Use, this number of landings, total number of Landing Zones and time on the ground would not qualify. And it is interesting to note that in the BLM's Instruction Memorandum No. 2001-030 – "attachment 1: Military Activities On The Public Lands", it gives several examples of military activities that might be considered of a casual use level. One of which is "f. Practice landing and takeoff of a helicopter or other aircraft at a remote location on public lands....." Note that the guidance doesn't say several

hundred landings each year or one hundred landings per month or even four landings each day at multiple locations during a year's time; it specifically states that the casual use would consist of "...landing and takeoff of a helicopter...at a remote location...", the key words in that being "a", meaning single. It also should be noted that IM No. 2001-030 expired 12 years ago, in 9/30/2002. Apparently it was never viewed as viable enough to renew or place in the BLM Manual.

The BLM, like every other Federal agency, is not legally able to pick and choose which laws or portions thereof they wish to obey or ignore. When the FLPMA was passed in 1976, both Congress and the BLM were adamant about not allowing the military to utilize the public lands for their purposes when the Department of Defense was rapidly gaining acreage and the BLM was losing acreage. The wording in Sec. 302 (43 U.S.C. 1732 (b) of the FLPMA is very specific (see above) and has not been modified even though there has been much discussion of that happening since the early 1990's. Realizing that BLM wishes to help the Department of Defense in its mission of providing the best training for its helicopter pilots and knowing that there will be some adverse publicity should the agency deny their application for landing sites, the fact remains that Congress passed FLPMA with very specific wording relative to the use of public lands by other Federal agencies. It is neither the job nor the mission of the BLM to find a way around that wording. If BLM, the military and the public wishes the military to utilize public lands for their maneuvers in the future, it is the job of Congress to change the law that restricts that use.

Paul W. Tanner
39 Kyndra Ct.
Canon City, CO 81212

 HAMET.docx
18K

Subject: Comments on Fort Carson's proposal to use public lands for military helicopter training.

Date: October 2, 2014

The Department of Defense is the third largest land holding agency in the Federal Government with 30 million acres. With that type of land holding base, there is no reason for them to come to the BLM and ask to utilize their lands for training of any sort. And while I'm sure the BLM wishes to appear patriotic and cooperate with the Department of the Defense in allowing the proposed HAME Training on public lands within the Royal Gorge Field Office boundaries, the Federal Land Policy and Management (FLPMA) act of 1976 [Sec. 302. [43 U.S.C. 1732 (b)] states very specifically that, "...unless otherwise provided for by law, the Secretary may permit Federal departments and agencies to use, occupy, and develop public lands ONLY through rights-of-way under section 507 of this Act, withdrawals under section 204 of this Act, and, where the proposed use and development are similar or closely related to the programs of the Secretary for the public lands involved, cooperative agreements under subsection (b) of section 307 of this Act".

Obviously neither the BLM nor the Department of Defense wishes to go through the withdrawal process for this proposed use of the public lands. The only way a cooperative agreement can be utilized is where the use is similar to or closely related to BLM programs, i.e. search and rescue. Granting of a Right-of-Way has been suggested and under FLPMA section 507. [43 U.S.C. 1767] (a) the BLM can grant any department or agency of the United States a right-of-way over, upon, under or through BLM land, subject to any terms and conditions the BLM chooses to add. However, a right-of-way should not be a proper method of authorizing the proposed HAMET use of public lands. FLPMA Sec. 501. [43 U.S.C. 1761] (a) and BLM Manual 2800 states that the BLM will use a ROW grant to authorize the use of public lands for systems or facilities that include:

1. Reservoirs, canals, ditches, flumes, pipelines, tunnels, and other facilities and systems which impound, store, transport, or distribute water;
2. Pipelines and conveyor belts for transporting and distributing solid materials;
3. Systems for generating, transmitting, or distributing electricity;
4. Systems for transmitting or receiving voice or electronic signals used for communication;
5. Transportation systems such as roads, trails, highways, railroads, canals, tunnels, tramways, airways, and livestock driveways, and
6. Any other system or facility for transportation, communication or other similar purpose over, upon, under or through public lands.

So it isn't readily apparent how helicopter landing sites can be viewed as a system or facility that would meet the above descriptions.

The military has been utilizing several landing sites on public lands under the BLM's pretense that it is somehow "Casual Use" even though "Casual Use" is not one of the options specifically laid out in Sec. 302 (43 U.S.C. 1732 (b) of the FLPMA. The military's Plan of Development for future HAMET discusses the frequency of sorties it plans under Tenant Unit training and Non-Tenant training. Tenant Unit training is to involve continuous training throughout the year with minimum usage projected to be 700 landings per year which, if each landing zone was used equally, would average out to 16 landings at each LZ each year. Non-tenant Unit training would evidently be more seasonal with maximum usage projected to be 1440 landings per year per landing zone. The two together add up to 1456 landings per year for each LZ or 121 landings per month or 4 each day on each designated LZ. The document goes on to state that there will be a half hour stay at each LZ for each sortie, or two hours each day at each of approximately 40 Landing Zones with a running helicopter on the ground. Under the most liberal interpretation possible of Casual Use, this number of landings, total number of Landing Zones and time on the ground would not qualify. And it is interesting to note that in the BLM's Instruction Memorandum No. 2001-030 - "attachment 1: Military Activities On The Public Lands", it gives several examples of military activities that might be considered of a casual use level. One of which is "f. Practice landing and takeoff of a helicopter or other aircraft at a remote location on public lands....." Note that the guidance doesn't say several hundred landings each year or one hundred landings per month or even four landings each day at multiple locations during a year's time; it specifically states that the casual use would consist of "...landing and takeoff of a helicopter...at a remote location...", the key words in that being "a", meaning single. It also should be noted that IM No. 2001-030 expired 12 years ago, in 9/30/2002. Apparently it was never viewed as viable enough to renew or place in the BLM Manual.

The BLM, like every other Federal agency, is not legally able to pick and choose which laws or portions thereof they wish to obey or ignore. When the FLPMA was passed in 1976, both Congress and the BLM were adamant about not allowing the military to utilize the public lands for their purposes when the Department of Defense was rapidly gaining acreage and the BLM was losing acreage. The wording in Sec. 302 (43 U.S.C. 1732 (b) of the FLPMA is very specific (see above) and has not been modified even though there has been much discussion of that happening since the early 1990's. Realizing that BLM wishes to help the Department of Defense in its mission of providing the best training for its helicopter pilots and knowing that there will be some adverse publicity should the agency deny their application for landing sites, the fact remains that Congress passed FLPMA with very specific wording relative to the use of public lands by other Federal agencies. It is neither the job nor the mission of the BLM to find a way around that wording. If BLM, the military and the public wishes the military to utilize public lands for their maneuvers in the future, it is the job of Congress to change the law that restricts that use.

Paul W. Tanner
39 Kyndra Ct.
Canon City, CO 81212



Re: please help stop reckless and disruptive activity help save our homes

Dcw0821@aol.com <Dcw0821@aol.com>

Thu, Jan 22, 2015 at 11:48 AM

To: blm_co_rg_comments@blm.gov

THANK YOU EVER SO MUCH FOR YOUR HELP AND SUPPORT WE NEED MORE LIKE YOU MOST RESPECTFULLY DONALD WILTSE

In a message dated 1/22/2015 11:45:32 A.M. Mountain Standard Time, blm_co_rg_comments@blm.gov writes:

Thank you for your comment. I will add you to our HAMET contact list. We will be back in touch as soon as we have news or something to review.

On Fri, Dec 12, 2014 at 12:33 PM, <Dcw0821@aol.com> wrote:

From: Dcw0821@aol.com
To: rgfo_comments@blm.gov
CC: dcw0821@aol.com
Sent: 12/12/2014 12:15:57 P.M. Mountain Standard Time
Subj: PLEASE HELP STOP RECKLESS AND DISRUPTIVE ACTIVITY HELP SAVE OUR HOMES

GREETINGS ,

It has just come to my attention that you are considering to foster the complete disruption of the HOMES of many hard working and honest American citizens who have struggled all their lives and are still currently struggling to exist in a small pocket of land where it is quiet , calm and tranquil and their family and animals can experience a harmonious and natural environment . I above many , am a STRONG AMERICAN PATROIT and know , realize and respect the fact that our veterans and military forces are in fact the very BACKBONE OF MY COUNTRY and it disturbs me greatly to see how the current political machinery disrespects and condescends these valiant men and women . I truly realize that military training is necessary for the protection on my nation . You as an American should realize that to allow this training to injure and harm those it seeks to protect is JUST PLAIN WRONG AND CONTAINS THE SAME DOUBLE TALK I CURRENTLY SEE ACTING TO WITHER AWAY THE GREAT AMERICAN SPIRIT THAT THE COUNTRY WAS BUILT UPON. America is much greater than a big piece of dirt . it is a STRONG , PROUD and NOBEL CONSCIOUSNESS that AIDS , PROTECTS and FOSTERS the lives of its citizens . When one begins to harm others because it is profitable or an easy solution , then he becomes a TRYANT and acts as a PIOUSIOUS VENOM that dissolves the great substratum on which this country was built i.e. " STAND TALL FOR YOURSELF AND YOUR FELLOW MAN & DO UNTO OTHERS AS YOU WOULD HAVE THEM DO UNTO YOU . My neighbor is a Disabled American Veteran Herself as well as being the Widow of an American Veteran (a veteran that gave over 20 years service) , so ask yourself what do you think this activity would do for her . This activity completely destroys and disrupts everything i have worked and struggled for all my life and as i am in my 60s there is no starting over . I have experienced ABSOLUTELY TERIBLE MOMENTS IN

THE PAST DUE TO THE THOUGHTLESS AND RECKLESS OPERATION OF
THESE HELICOPTERS AT ALL HOURS AND WHICH HAVE
ALSO GENERATED EXTREME TERROR IN MY ANIMALS.

PLEASE DO THE RIGHT THING AND HELP SAVE OUR COMMUNITY

THANK YOU FOR YOUR CONSIDERATION

DEC 12 , 2014

MOST RESPECTFULLY DONALD WILTSE CACTUS MOUNTAIN COMMUNITY



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET - Mailing list

1 message

Josh <bigpoppajnutz@gmail.com>

Tue, Jan 20, 2015 at 1:22 PM

To: RGFO_Comments@blm.gov

To whom it may concern,

I would like to be added to the mailing list.

I'm a part time resident, soon to be full time resident, of Guffey. Specifically the Pike Trails area. In the 20+ years I have been visiting the area I have noticed a change in the wildlife in that area and I am very concerned over the increasing air traffic and the continuing impact of such activities.

Thanks,
Ben "Josh" Tatum



Community of Our Lady and Saint Laurence

Affiliates of the Benedictine Fellowship of Saint Laurence

4076 Cabin Creek Road colsl@saintlaurenceosb.org
Canon City, CO 81212 303-885-1922

December 19, 2014

Ms. Nancy Keohane
NEPA Specialist
Royal Gorge Field Office, Bureau of Land Management
3028 East Main Street
Cañon City, CO 81212

Re: Fort Carson HAMET Proposal on and Around BLM Public Lands

Dear Ms. Keohane:

We are a small, Antiochian Orthodox Christian monastery of contemplative monks and nuns following the ancient *Rule of St. Benedict*, located on Tallahassee Creek, adjacent to BLM Public Lands. Our 600-acre campus is also home to a retreat center that serves not only Orthodox Christians, but also Christians of other denominations. Our buildings are situated on the banks of Tallahassee Creek, in a valley between Crampden Mountain and Table Mountain.

As you might guess, this location was chosen not only for the beauty of the terrain, but for its isolation and quiet. Silence plays a major role in our lives as contemplatives, and is a major "draw" for those who come here to spend time on retreat. Major portions of the day and night are designated for silent prayer and meditation, something for which our location has proven ideal. We also have four religious services a day in the church on the campus, morning, midday, evening, and night. Further, the unpredictable and disruptive level of noise from the planned exercises not only threatens our treasured silence, it literally threatens the very basis on which our retreat ministry – one of our sources of income – is based.

Having learned of the plans for HAMET, our community and its sponsoring Colorado Not-for-Profit Corporation, the Benedictine Fellowship of Saint Laurence, are very concerned by the prospect of this silence being, quite literally, shaken and shattered at any time of night or day. Three helicopter fly-overs on the evening of Dec. 9th, clearly involving craft of a size or type that were military, not only produced tremendous noise, but physically shook the chair in which I was sitting, along with windows, and caused serious distress to our animals. It saddens us to be in the position of protesting against training exercises geared towards the readiness of our military: Two of our monks are veterans and the Executive Director of the Benedictine Fellowship is brother-in-law to General Charles Campbell, former Commanding Officer at Fort Carson.

I apologize that this was sent to you in the evening of the last day for expressing concerns. I have been ill and am just able to write. Please know that this comes with our respect for the dedication and service of the men and women of our military and, also, those who serve the public interest in the Bureau of Land Management. We sincerely hope that, if it is not possible to relocate the training exercises, some way of minimizing the disruption to our valued way of life might be found.

Sincerely yours,

Ven. Monk Theodore (Phillips)
Prior

Activa in Oratio et Orantem in Actionis



HAMET

Ric Turley <ric@ricturley.com>
Reply-To: hamet@ricturley.com
To: rgfo_comments@blm.gov

Thu, Dec 18, 2014 at 8:17 AM

A strong military requires training and our military should train in the safety of American soil before being deployed to war zones. This annoyance is minor when compared to the impact to citizens in our deployment zones. I have no problem with HAMET.

Thanks,
Ric Turley



High Altitude Mountain Environment Training

Mark Volcheff <volcheff@msn.com>

Sun, Dec 21, 2014 at 10:59 PM

To: rgfo_comments@blm.gov

>> BLM Representative:

>>

>> I am a former Air Force officer and pilot and now running a business in the Colorado Springs area. I am a strong advocate of the need for robust high altitude training for the aviation mission at Ft Carson.

>>

>> The environmental conditions in the greater Colorado Springs area cannot be realistically duplicated or simulated at or near most other Army bases in the country. The training this area provides is absolutely essential for the readiness of Army aviators and the missions they fly.

>>

>> While there are certainly the vocal minority that will be against robust or even continued aviation training using BLM lands, you can be assured their only concern is that it not be done "in their backyard" and they too see the absolute necessity to have this kind of training available. I am familiar with the great strides the US Army and BLM have gone through to trying to mitigate noise and other ancillary byproducts of the training and I do urge the Army to continue to take a holistic approach to continue to research environmental impacts. In the end however, it is clear the Army needs lands like they find under the BLM that must be used to keep the Army's skills honed.

>>

>> There will continue to be those who might feel inconvenienced by the occasional intrusion of aircraft flights that cause brief noise issues. I believe they, as well as the vast majority of the citizens of the Front Range area will take great comfort knowing that small inconvenience goes a long way to keep the aviators at the peak of performance.

>> I STRONGLY SUPPORT the continued use of BLM land and the US Army efforts to utilize it for their aviation needs.

>>

Regards,

Mark Volcheff
HomeLand Security Solutions, LLC
719-660-6762



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

MTA proposal

walker moore <walkermooore2@hotmail.com>

Thu, Oct 9, 2014 at 8:27 AM

To: rgfo_comments@blm.gov

I have a mile of shared boundary with BLM land in Fremont County and support the HAMET proposal.

My only objection is that the proposed LZs do not include the Kerr Gulch Allotment.

John Walker

P.O.Box 27

Coaldale, CO 81222

719-942-3687



BLM Use for Helicopter Training

BW <bwaluda@yahoo.com>
To: rgfo_comments@blm.gov

Sun, Dec 7, 2014 at 9:48 PM

Hello,

I am a land owner east of the town of Guffey, Colorado in Park County.

I have reviewed the documents relative to the request to allow helicopter training areas on BLM. I have also reviewed some of the comments by concerned landowners.

I must agree there will be impacts to families, animals, and the environment, unless properly managed.

I served as a UH-1B (Huey) crew chief/door gunner in Vietnam with the US Navy Seawolves (HAL-3), and as a rescue swimmer with Helicopter Combat Support Squadron Two (HC-2), "Fleet Angels" stationed at Lakehurst, New Jersey, but deployed worldwide aboard various US Navy Aircraft Carriers.

<https://www.navysealmuseum.org/home-to-artifacts-from-the-secret-world-of-naval-special-warfare/seawolf-helicopter>

I also maintain a relationship with HSC-84 stationed in Virginia Beach, VA. Their mission is in support of Combined Service Special Warfare units.

As such, I fully respect, and support, the need of our military helicopter units to practice for wartime scenarios. I trust you to consider both sides of the issue and to minimize negative impact to both sides, especially in the more heavily populated areas that are under consideration. Specifically, I think designated landing areas 701 thru 706 are extremely close to highly populated areas, and will be highly stressful to residents of that area.

For the above reasons, I request that you deny the request for areas 701 through 706, or limit their use considerably, as well as the use of any other training areas in the more heavily populated areas, and allow limited use only if those training areas provide a training benefit not found in other training areas being requested.

Respectfully yours,
Barry Waluda
Major, USAR Retired
719-213-3290



Comments to HAMET

Alfred Webster <agw@cre-denver.com>

Fri, Dec 19, 2014 at 11:54 AM

To: rgfo_comments@blm.gov

Cc: nkeohane@blm.gov, Lee.Colburn@mail.house.gov, mbrazell@parkco.us

To Whom It May Concern,

I attended the meeting on 12/4/14 to discuss the HAMET program. I attended because I thought there would be very few people in attendance. I am a relatively new owner 7/15/13 and I did not know about the original HAMET program. I was surprised by the attendance and some of the hostility. However, I have been involved with public meetings for several clients including the Army and I am well aware of public hostility as I build incineration systems. As usual with programs of this nature there is a lot of misinformation and misconception. Additionally, there are bad feelings from the former trial run of the HAMET program. There will always be some misinformation but there are ways to minimize the misinformation such that most people can make informed decisions based on fact not hearsay. It is impossible to make progress with a large group of people most of whom are against the program.

I strongly suggest that the Army and BLM have the residents form a Citizens Action Committee. The committee should have a maximum of 7 people each individual representing the various areas that are affected by the program. The people on the committee would represent their area and speak for the people in that area. With the smaller committee the Army and BLM will be able to get more concise information on the problems and problem areas affected by the program. This will help the Army and BLM make informed decisions on real problems.

I live on Aspen Meadows Ranch in Guffey Colorado and we are surrounded by BLM land. My property includes Baldy Mountain and part of Hammond Mountain. There are 5 landing sites close to the homes in this area (Sites 601 - 605); 4 of which are adjacent to Aspen Meadows. The previous owner of my property did have a helicopter hovering over private land just west of my deck at 2:30 AM. The noise from the helicopter was heard throughout the community and in the town of Guffey. I respectfully request that landing areas 601 through 605 be eliminated from the proposed HAMET program to protect our homes, the wildlife and the fragile ecosystem of Aspen Meadows Ranch and the Guffey area.

Thanks you for your time.

I am more than willing to discuss this topic with the Army and BLM, I have listed my phone numbers below.

Thank You,

Alfred Webster

Aspen Meadows Ranch

2785 Aspen Meadows Lane

Guffey, Colorado

Cell: 303-884-9994

Work: 303-758-7373

agw@cre-denver.com



Fort Carson proposed agreement with BLM

marilynwerner07@comcast.net <marilynwerner07@comcast.net>

Sat, Nov 1, 2014 at 5:22 PM

To: RGFO_comments@blm.gov, "Werner, Marilyn" <marilynwerner07@comcast.net>

Cc: "Witcher, Steve" <s.witcher@ccvnet.net>

To: NancyKeohane,Colorado Renewable Energy Team Bureau Land Management
From: Marilyn Werner, Lakemoor West

Let me say first that I fully support our military. Helicopter training is necessary and valuable and it needs to be conducted somewhere near Fort Carson.

I am concerned about the proposed use of BLM site off High Park Road (LZ 701-706) This would involve helicopter takeoffs and Landings. This noise pollution would be very unpleasant to most of the residents in the area. and it would have a negative impact on ranching operations in the area.

There are other sites that are just as useful for these training purposes, sites that would not affect as many residents of the area. Please consider other BLM land away from residential areas for these purposes.

Sincerely,
Marilyn Werner
3301 Lakemoor Drive
Florissant CO 80816



High Altitude Mountain Environment Training Comments

Patricia Wiseman <patricia.wiseman@yahoo.com>

Thu, Dec 18, 2014 at 4:46 PM

Reply-To: Patricia Wiseman <patricia.wiseman@yahoo.com>

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

As a taxpayer and property owner near the proposed training area I am opposed to this continued training in this area.

1. BLM land is public land that supports the natural habitat of the indigenous & migratory populations of various species of wildlife as well as ancient forests and various plants that support life. Military training in the air with landings, crashes , and recovery operations will disrupt this fragile ecosystem and endanger the local inhabitants' existing environments and birthing habitats.

2. Fort Carson and the military currently have numerous mountain training sites at the Air Force Academy, Rampart Range, Fort Carson, Cheyenne Mountain and extensive sites already in place throughout Colorado, Nevada and other mountain states. There is NO NEED to continue to expand and disrupt life in the proposed rural, peaceful areas. Limit their training areas to the vast lands and cities that they already occupy.

3. These missions are dangerous and often result in crashes that cause pollution and wildfires in rugged terrain .Our area is just now beginning to recover from severe fires and fire danger. This tinderbox of pristine forests and open space will be threatened by potential widespread wildland fire that will likely devastate the natural landscape and life as well as cause widespread property loss to private landowners. Any cost, loss, or damage (including structure damage due to vibration) to private lands and structures by Fort Carson, its guest CAB, or pilots must be the full responsibility of Fort Carson.

Please consider the negative impact on water quality , life, and personal freedom that this will have.

Rejection of this proposal protects property values and preserves natural resources and quality of life of current and future generations.

Summary of Comments Made at the HAMET Public Meeting

Heritage Center, Cripple Creek, CO; 4 Dec 2014

I preface these remarks by stating that I have lived in Florissant for nearly 10 years. My wife and I grew up in Colorado and after 13 Air Force moves in the 26 years mentioned below we spent less than 3 of those years in Colorado. I retired and we moved back in 2005. Even though our house is 13 miles away from any of the landing zones, we do have helicopters (Blackhawks by sound) occasionally fly over our home, dwell in the area, and even hover very close to our home. It is important that the people in the area recognize the need for military aviators to train for combat aggressively and effectively. Some noise will be inevitable, but it shouldn't be something that detracts from a comfortable life. If done right, people will recognize the training being done and be proud that it's happening in their "back yard." Done wrong, there will be an adversarial relationship.

Of my 26 years in the Air Force, I spent more than 20 of them flying the A-10 (about 2,500 hours), a lot of the time at 250 to 500 feet Above Ground Level (AGL) over Europe, Alaska, and the southwest US. People who aren't used to seeing aircraft at that level often think they are lower than they are, especially when the aircraft is moving very fast, or very slow. From the cockpit 500' AGL seems incredibly high to the pilot. From a combat perspective it's high enough, in a threat environment where low altitude is necessary, to feel very exposed. At lower altitudes (250 - 300ft AGL) a pilot is busier, but it still seems relatively high. Most pilots are aware that people on the ground perceive it differently than the pilot and make every effort to avoid people and animals whenever possible.

There are things that can be done to make the HAMET proposal more palatable to local people. First, the maps used to determine where to place Helicopter Landing Zones cannot be accurate enough to show the growth of development in the local area, especially in Teller County, but likely in Park and Fremont as well. There are commercial imagery products that BLM could probably access (maybe not the US Army, posse comitatus?). But the Army owes it to the public to carefully examine the area around each HLZ (road trips/helo visits with locals) to make sure the zones don't have homes or livestock near them. There is enough real estate around to make sure that happens. Finally, the 1000M (about 5/8 mile radius) area in which pilots can go as low as Nap of the Earth (NOE) flight is probably excessive, at least where the HLZ is near (audible from) homes. The Army would do well to make the volume of flight more reasonable (to reflect what Capt Mathews actually projected) than the "high ball" number of 1,440 in the proposal. It might also make the proposal more acceptable if it included a visible and written plan to rotate HLZs.

I believe the Army and Ft Carson (4 ID) can maintain disciplined flight and correct local pilots who make a mistake, or intentionally violate the rules. But, I am concerned about visiting pilots. My experience working with visiting aviators at National Training Center (NTC) and COPE THUNDER exercises in Alaska, as well as Navy and Marine pilots, in particular, is that they will be more difficult to keep in control. When pilots are deployed they tend to be less concerned

about noise complaints because “they don’t have to live with it.” The HAMET environment may be more a “training” than combat oriented exercise environment and so that pilots might be more likely to comply with rules. My experience with Navy and Marine pilots, (Special Ops, too), in general, is that they are less concerned about such things than Air Force and Army pilots. 4th ID should develop and be able to convince everyone of the fact that they have very strong systems in place to ensure compliance and enable discipline.

Finally, I am concerned that HAMET seems to becoming the “training du jour.” There has been a well-established high altitude helicopter training program operated by the CO ANG out of the Eagle County airport for many years. They operate in an environment that is far more similar (elevation-wise) to the environment in Afghanistan than the 8-10,000 foot elevations in Teller and Fremont counties. They fly over the ski area I work at and around the ridge-lines above it routinely. The BLM rep mentioned a similar proposal being reviewed in Lincoln National Forest in New Mexico. It appears that there may be many organizations trying to justify their existence with a training program only one needs to provide. That would be a significant waste of taxpayer money.

Comment Form Submitted:

Board Member of Pikes Peak Historical Society
18033 Teller County Rd 1,
Florissant, CO, 80816,
(719)748-8259

- 1) There are numerous Ute Indian cultural sites scattered around the area. These sites include medicine wheel vision quest locations, Ute defensive fortifications, culturally significant prayer trees. These sights need to be researched and the sights catalogued and avoided in accordance with the Antiquities Laws and Regulations (e.g.: Antiquities Act, 1906, Archaeological Resources Protection Act, National Historic Preservation Act of 1966, Native American Graves Protection).
- 2) The Colorado Air National Guard already does HAMET out of the Eagle County Airport. That training is far more effective. Any training below 10,000ft does not remotely simulate conditions in Afghanistan. Two units doing the same training is a waste of taxpayer money.
- 3) Minimum altitudes over denser population areas (most of Teller County and large sections of Park and Fremont Counties) should be at least 1,000ft AGL. Consider cross-referencing FLIP AP/1 to compare minimum altitudes on the low level training routes that crisscross the area. Those routes were raised in the 80's because of increased population density.
- 4) Careful consideration should be given to population density - do not use older maps (anything older than 2010 is woefully outdated) to select landing zones or ingress and egress routes

I write these comments with the experience of 26 years and nearly 4,000 hours of Air Force tactical aviation jet time, most of it in the A-10. I also led the organization that makes military aviation maps so I know how out-of-date those maps are.



HAMET Comments

Scott Adams <adams.sa@juno.com>

Fri, Dec 5, 2014 at 1:06 PM

To: rgfo_comments@blm.gov

Nancy,

I submitted one of these comments in written form last night (CommentFormSubmitted...). This is essentially the same, but with errors I made while writing fast corrected. The second is the verbal comments I made (Comment_Sum...). Rep Lamborn's office asked for a written summary and it would be appropriate for you to have them, also.

I have sanitized both so please DO NOT release my person information.

I would be happy to help, or answer questions and you may email me back if I can.

Thanks.

Scott Adams

2 attachments



CommentFormSubmitted_san_12-4-14.docx

16K



Comment_sum_12-4-14_san.docx

18K



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET studies in Hawaii

Douglas W. Boucher <dwboucher3@gmail.com>

Wed, Dec 17, 2014 at 1:16 PM

To: share@guffeynews.com, utiart@gmail.com, Lee.Colburn@mail.house.gov, mbrazell@parkco.us,
rgfo_comments@blm.gov

Cc: kthbchr@gmail.com

See the following article from 2011 about an Army unit in Hawaii that did environmental studies concerning HAMET and which appears to have had a much better approach.

<http://www.bigislandvideonews.com/2011/03/20/u-s-army-to-conduct-hamet-impact-tests-on-mauna-kea/>



RE: Information concerning HAMET FW: New threat to Birds and Wildlife in the Colorado Rockies

Mike Brazell <MBrazell@parkco.us>

Tue, Jan 6, 2015 at 6:44 AM

To: Kathie Boucher <kthbchr@gmail.com>, "Lee.Colburn@mail.house.gov" <Lee.Colburn@mail.house.gov>, "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Kathie,

There will be another opportunity in January or February for another period for public comment as I mentioned before. As soon as they announce the dates and locations I will pass it along. This would be the appropriate time to present issues like the ones you mention.

Thanks
Mike

Thanks
Mike

Mike Brazell
Park County Commissioner
303 884-1655

----- Original message -----

From: Kathie Boucher <kthbchr@gmail.com>

Date: 01/05/2015 6:26 PM (GMT-07:00)

To: Lee.Colburn@mail.house.gov, Mike Brazell <MBrazell@parkco.us>, rgfo_comments@blm.gov

Subject: Information concerning HAMET FW: New threat to Birds and Wildlife in the Colorado Rockies

I just received this email today from the Cornell Lab of Ornithology. There is some significant information contained in this email that I feel should be included in the decision about HAMET. I know it is well past the deadline for input but I sincerely hope you will consider the information provided.

Thank You.

Kathie and Doug Boucher

From: Cornell Lab of Ornithology [mailto:cornellbirds@cornell.edu]

Sent: Monday, January 05, 2015 8:59 AM

To: kthbchr@gmail.com

Subject: RE: New threat to Birds and Wildlife in the Colorado Rockies

Hi Kathie and Doug,

Thanks for the email. I can sympathize with the potential disruption this plan would cause to various beings in the immediate area.

Unfortunately, with such a short window of time there is no way we could have pulled anything together to help you by the 19th. In general we can counsel, but can't write letters of support for all issues of this kind.

A good first step is usually to identify any state- or federally-listed animals and plants that might live in the affected areas. Here is a page that will help you find these:

<http://cpw.state.co.us/learn/Pages/SOC-ThreatenedEndangeredList.aspx>

You can then check if any of the birds on this list live or are regularly seen in the area by using the eBird species maps: <http://ebird.org/ebird/map/>

Many high-altitude species are indeed under threat, so you may find that there are some species that would warrant protection—the next trick is convincing the powers-that-be that these flights will negatively impact the populations. There has been considerable work on the effects of road noise on bird populations (https://www.fhwa.dot.gov/environment/noise/noise_effect_on_wildlife/effects/wild04.cfm); and on flying vehicles (www.fai.org/component/phocadownload/category/1107-air-sports-and-wildlife?download=2924:lan-3-1-aircraft-effects-on-birds) (<http://www.fai.org/component/phocadownload/category/1107-air-sports-and-wildlife?download=2924:lan-3-1-aircraft-effects-on-birds>)

I'm happy to discuss this further—and I apologize for the delay in replying.

Good luck,
Marc

Marc Devokaitis
Public Information Specialist
Coordinator, Adelson Library<<http://www.birds.cornell.edu/Adelson>>
Coordinator, Spring Field Ornithology<<http://www.birds.cornell.edu/sfo>>

The Cornell Lab of Ornithology
159 Sapsucker Woods Rd
Ithaca, NY 14850

Have we helped you out today? Become a supporter<<https://secure3.birds.cornell.edu/SSLPage.aspx?pid=1600>> if you are not one already.
Stay in touch: sign up for our eNews<<https://secure3.birds.cornell.edu/SSLPage.aspx?pid=1065>>.

The Cornell Lab<<http://www.birds.cornell.edu/Page.aspx?pid=1478>> is supported by people like you!
Our mission is to interpret and conserve the earth's biological diversity through research, education, and citizen science focused on birds.

[05_cornell_sm]

From: Kathie Boucher [mailto:kthbchr@gmail.com]
Sent: Wednesday, December 17, 2014 2:56 PM
To: Cornell Lab of Ornithology Membership Services
Subject: New threat to Birds and Wildlife in the Colorado Rockies

We live in southeastern Park county in Colorado. We recently have been informed that Ft Carson (Army base located south of Colorado Springs) is requesting from the BLM (Bureau of Land Management) for the use of over 30,000 acres of mountain terrain in southeastern Park, Teller and Fremont counties in Colorado. The army wants to use this land for training helicopter pilots in mountainous high altitude situations. The army tells us that there will be thousands of landings and flight trainings at low levels, 25' above ground in and among the trees, rocks and hills. The possibility of crashes is very real also. We live in a drought prone area and much of the area would be difficult to reach to fight a fire. The army is requesting this use for a period of 10 years.

While we understand the need for such training, there is much concern about the dangers such activity will have on the land, people, wildlife and birds that call this area home. There have already been problems with the current use of other lands that the army was given permission to use. What will this do to our bird populations over that period of time. The birds have a difficult enough time surviving up here(9000') as it is. Do they really need any more stress?

Unfortunately there is a very short period of time to voice our concerns about this problem. December 19,, 2014 is the deadline for input. Attached are three emails that give details about this problem.

Your voice could substantially aid us in stopping the BLM from allowing this request.

Thank You,
Kathie and Doug Boucher
3980 County Rd 71
Guffey, CO 80820
719-689-0987
kthbchr@gmail.com<mailto:kthbchr@gmail.com>

The **Cornell** Lab  image001.jpg
3K

HAMET Impact and my experience with Air Force Site Surveys

The High Altitude Mountain Environment Training (HAMET) brings to mind a series of site surveys I conducted as a Captain/Major in the United States Air Force for the Ground-based Electro-Optical Deep Space Surveillance System (GEODSS) in the 1970s. This system is now operational as the United States primary deep space satellite detection and tracking system worldwide. There are GEODSS sites in New Mexico, Hawaii, Diego Garcia in the Indian Ocean, and a partial site in southern Spain. There had been a GEODSS site in South Korea, but it was closed due to poor weather. I did the GEODSS site surveys for the New Mexico, Korea, and Hawaii sites, and also for a potential site in Morocco that was changed to Spain for political reasons. I was scheduled to do the GEODSS site survey in Iran but it was cancelled at the last minute because of the Iranian revolution, leaving Diego Garcia the only alternative.

One very important aspect of these site surveys was the on-the-spot ground assessment of each potential site and the travel routes to those sites. If you do not go there in person, and actually measure and assess the exact current condition of the property, you can be in for some very unpleasant surprises when you attempt to build on and use the proposed site.

Example 1. The Korean site selected was on the west side of a mountain just west of Taegu. That side of the mountain was protected from adverse lighting and cloud patterns that can seriously impact an optical site. I made several hours of measurements of night-time lighting conditions on the shielded side of the mountain, and another assessment of the Taegu side of the mountain, and determined the shielded side was suitable, but the Taegu side was not. Several years later, when it was time to build the site and install the equipment, the USAF discovered that somebody else had built a dairy farm on the shielded side of the mountain. That site was no longer available so the USAF decided to use the unshielded side of the mountain. Several years and millions of wasted dollars later, the site was closed due to inability to perform its mission efficiently. If we had known about the new dairy farm, we would have changed our plans.

Example 2. When we were evaluating potential GEODSS sites in New Mexico and Arizona, we selected a dozen or so potential sites based on aerial surveys, ground maps, current facilities, and travel brochures. Then we went and visited every one of them with a team of about a dozen experts, and included devices to measure the sky brightness at night, interference from lights, radio or radar, even the quality of well water. Several sites were rejected due to bright lights from nearby cities or bases. One otherwise wonderful site, the abandoned Moriarity Air Field east of Albuquerque was rejected because of interference from bad spark plugs in trucks traveling along the nearby newly built Interstate Highway 40. We had never considered that factor until we visited the exact spot in person. We also rejected several bases in Arizona after having visited the exact spots chosen from the map-based surveys. Instead we picked a secluded spot on White Sands Missile Test Range, near Socorro, New Mexico. The primary GEODSS site is operational there today. It is performing even better than expected.

Example 3: The GEODSS sites needed to be distributed fairly evenly in Longitude for proper coverage of the various orbits of deep space satellites, and should be within about 45 degrees North or South Latitude, and be at a high altitude if possible. One site had to be somewhere in the Pacific Ocean, probably Hawaii. There was a USAF optical observatory on top of Mount Haleakala on Maui, and that site was the automatic choice. Nevertheless we went there in person, and did a complete ground survey even though there were really no other options. We discovered a lot of factors we had not learned from the map and aerial surveys. There were buildings there that nobody talked about. One low building with horizontal slit windows overlooked the airburst nuclear tests that had been conducted from Johnston Atoll some years earlier. It was not documented, photographed or mentioned. We couldn't use that spot, although it looked good on the map survey. We found out that the top of Mount Haleakala is porous lava and we would need four to eight times as much liquid concrete to build our foundations because the lava soaked up concrete like a sponge. We learned that we could not disturb the Silver Sword plants because they are endangered and flower only once in a lifetime. Can't dig there, find another spot. We did. The Air Force has a GEODSS site on Mount Haleakala today, modified to fit the space.

We learned that every time you want to use a piece of land for a military purpose, you don't just get your way because you want to use it, even if it is public land. You have to do an on-the-spot ground survey and verify that your choice breaks no rules and does no damage.

If it is private land, you can't fly over it if you travel below Federal Aviation Administration 500 foot elevation limits. We had to get specific permits to airlift equipment into a site.

Questions:

1. Has the Army visited, in person, each and every exact proposed landing spot, on the ground, to verify that the HAMET operation would not interfere with current legal use of that land? Such documentation, if it exists, must be made public. An aerial survey will never suffice.
2. Has the Army planned, documented, and trained (or plans to train) pilots to ensure that their flights will not drop below 500 feet above ground level when such flights are over private land? Because some public (Bureau of Land Management) lands may be used for multiple purposes, what plans has the Army made to ensure that HAMET does not interfere with legitimate civilian uses such as camping, fishing, and hiking? Do flight plans avoid private homes and property?
3. Will the Army give public notice of any and all HAMET exercises/events so that civilians in the flight path can be prepared to deal with the potential disruption to the native peace and quiet?

Douglas W. Boucher, Major, USAF, Retired
3980 County Road 71, Guffey, CO 80820
Phone (719) 689-0987
Email: dwboucher3@gmail.com



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET

Mike Brandt <brandtmk@gmail.com>

Fri, Dec 19, 2014 at 4:27 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Thank you for allowing me to comment on this proposal. Please see my comments in the attached letter.

Mike Brandt



2014.12.19 HAMET comments.docx

159K



HAMET

Bastian, Eleanor <Eleanor.Bastian@mail.house.gov>

Fri, Dec 19, 2014 at 12:27 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Cc: "kberger@blm.gov" <kberger@blm.gov>, "Clanahan, Jennifer" <Jennifer.Clanahan@mail.house.gov>

Thank you for requesting comment. Please see the correspondence from Rep. DeGette attached, as well as maps and a letter referenced in her correspondence.

Best,

Eleanor

Eleanor E. Bastian
Legislative Director
Congresswoman Diana DeGette (CO-01)
2368 Rayburn House Office Building
Washington, D.C. 20515
(202) 225-4431

6 attachments



HAMET Letter.pdf

52K



Fremont letter.pdf

279K



BadgerCreekPWAOct20.pdf

1197K



BeaverCreekPWAOct20.pdf

1762K



McIntyreHillsPWAOct20.pdf

1087K



Table Mountain.pdf

334K

DIANA DeGETTE
1ST DISTRICT, COLORADO

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WASHINGTON, DC 20515
(202) 225-4431
FAX (202) 225-5657

DISTRICT OFFICE:
600 GRANT STREET, SUITE 202
DENVER, CO 80203
(303) 844-4988
FAX (303)844-4996

<http://degette.house.gov>

Congress of the United States
House of Representatives
Washington, DC 20515-4329

CHIEF DEPUTY WHIP
COMMITTEE ON ENERGY AND
COMMERCE
RANKING MEMBER
SUBCOMMITTEE ON OVERSIGHT AND
INVESTIGATIONS
SUBCOMMITTEE ON
ENVIRONMENT AND THE ECONOMY
SUBCOMMITTEE ON COMMUNICATIONS
AND TECHNOLOGY

Keith Berger, Field Manager
Bureau of Land Management, Royal Gorge District Office
3028 East Main St.
Canon City, Co 81212

December 18, 2014

Dear Mr. Berger,

I write with regard to the application and Plan of Development (POD) from the US Army Fort Carson requesting the use of public lands to conduct High Altitude Mountain Environment Training (HAMET). While I understand and support the desire of the Army to conduct training exercises for critical national security purposes, I am concerned by the specific location of some of these proposed exercises.

Since 1999, I have introduced legislation to protect some of the last, best wild areas in our state, the Colorado Wilderness Act. There are several proposed wilderness areas in my bill that overlap with proposed training and landing zones in the current HAMET proposal. These areas include Badger Creek and Table Mountain and, depending on flight patterns, the Beaver Creek and McIntyre Hills areas.

While the Fort Carson POD suggests that only 235 acres will be used for the helicopter landing zones, the true impact is much greater. The Table Mountain proposed wilderness area is nearly 28,000 acres and the Badger Creek proposed wilderness area is another 22,350 acres that may no longer be eligible for Wilderness designation. These are areas that provide habitat for bighorn sheep, mountain lion and winter range for bald eagles in addition to many other species. They provide other ecological benefits as well as outstanding recreational opportunities.

These areas have received strong local public support for wilderness protection. At the most recent public meeting in Canon City, approximately 100 residents showed up and offered near unanimous support. Attached is a letter expressing the unanimous support from Fremont County Commissioners.

The POD states that the Army seeks to avoid areas of concern including sensitive or protected resources. I believe Table Mountain and Badger Creek proposed wilderness areas fit within that category. In fact the eastern two-thirds of the Table Mountain area is recognized as the Arkansas Canyonlands Area of Critical Concern.

Please consider these comments as you proceed with the Environmental Assessment of the POD.

Sincerely,



Diana DeGette
Member of Congress



Fremont County Board of Commissioners

615 Macon Ave., Room 105 – Cañon City, Colorado 81212

Phone (719) 276-7300 - Fax (719) 276-7304

Michael J. Stiehl
District One

Larry Lasha
District Two

Ed H. Norden
District Three

September 14, 2010

Congresswoman Diana DeGette
2335 Rayburn House Office Building
Washington, DC 20515

Congresswoman DeGette,

We write to offer our support for your wilderness proposal, The Colorado Wilderness Act of 2009. Four areas in Fremont County, Beaver Creek, Grape Creek, McIntyre Hills and Badger Creek, are candidates for Congressional Wilderness designation. All of these areas are stunning areas worthy of this greatest level of protection for federal lands.

The Wilderness Act states that as our population increases and expands, we should protect for ourselves and future generations those lands where "the earth and its community of life are untrammeled by man". We firmly believe these areas display these natural qualities and should enjoy permanent protection of their natural, scenic, recreational and biological attributes.

Wilderness is highly valued by Colorado Residents for activities such as hiking, horseback riding, boating, camping, hunting, fishing, grazing, cross-country skiing, snowshoeing, wildlife viewing and bird watching. It also provides critical large tracts of undisturbed contiguous lands that support wildlife habitat and ecosystems that sustain wildlife migration, health and a diversity of species.

Many of these areas have been Wilderness Study Areas for many years, and as such they have been managed as Wilderness by the Bureau of Land Management. Wilderness designation will give a sense of finality for those that enjoy them.

Fremont County's economy is strongly supported by tourism, and wilderness areas are often a draw to a region. Wilderness also offers protection of watersheds, clean water and clean air.

For all of these reasons, we support designating Beaver Creek, Grape Creek, McIntyre Hills and Badger Creek proposed areas as Wilderness.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed H. Norden", written over a horizontal line.

Ed Norden, Chair

A handwritten signature in blue ink, appearing to read "Mike Stiehl", written over a horizontal line.

Mike Stiehl

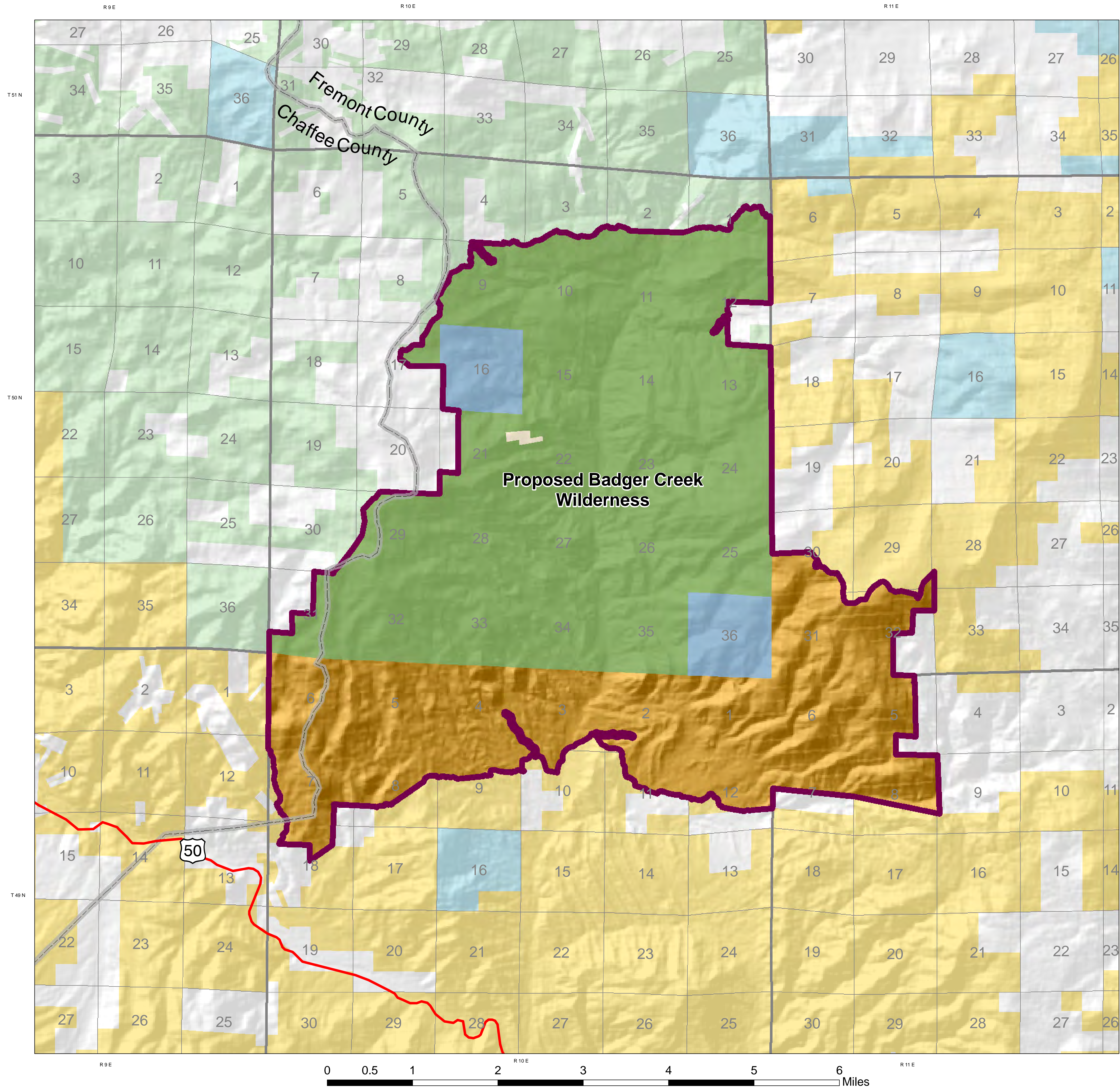
A handwritten signature in blue ink, appearing to read "Larry Lasha", written over a horizontal line.

Larry Lasha

Badger Creek Proposed Wilderness Area

October 20 2010

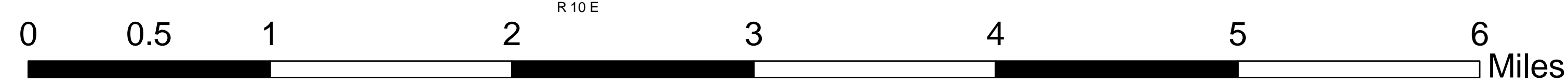
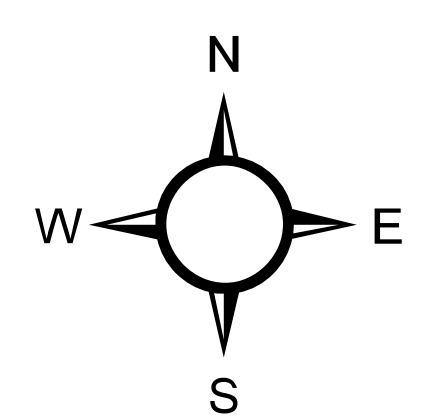
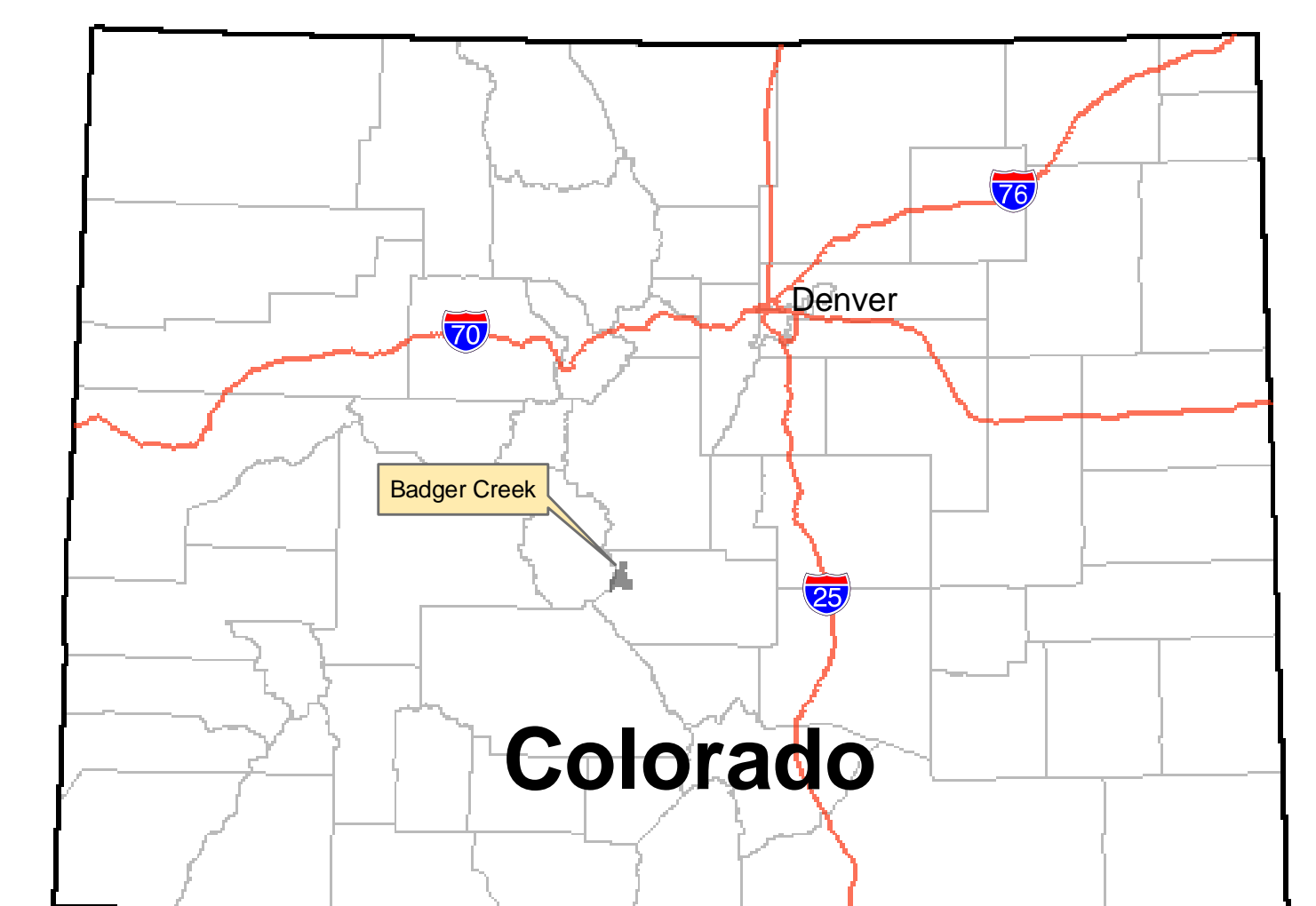
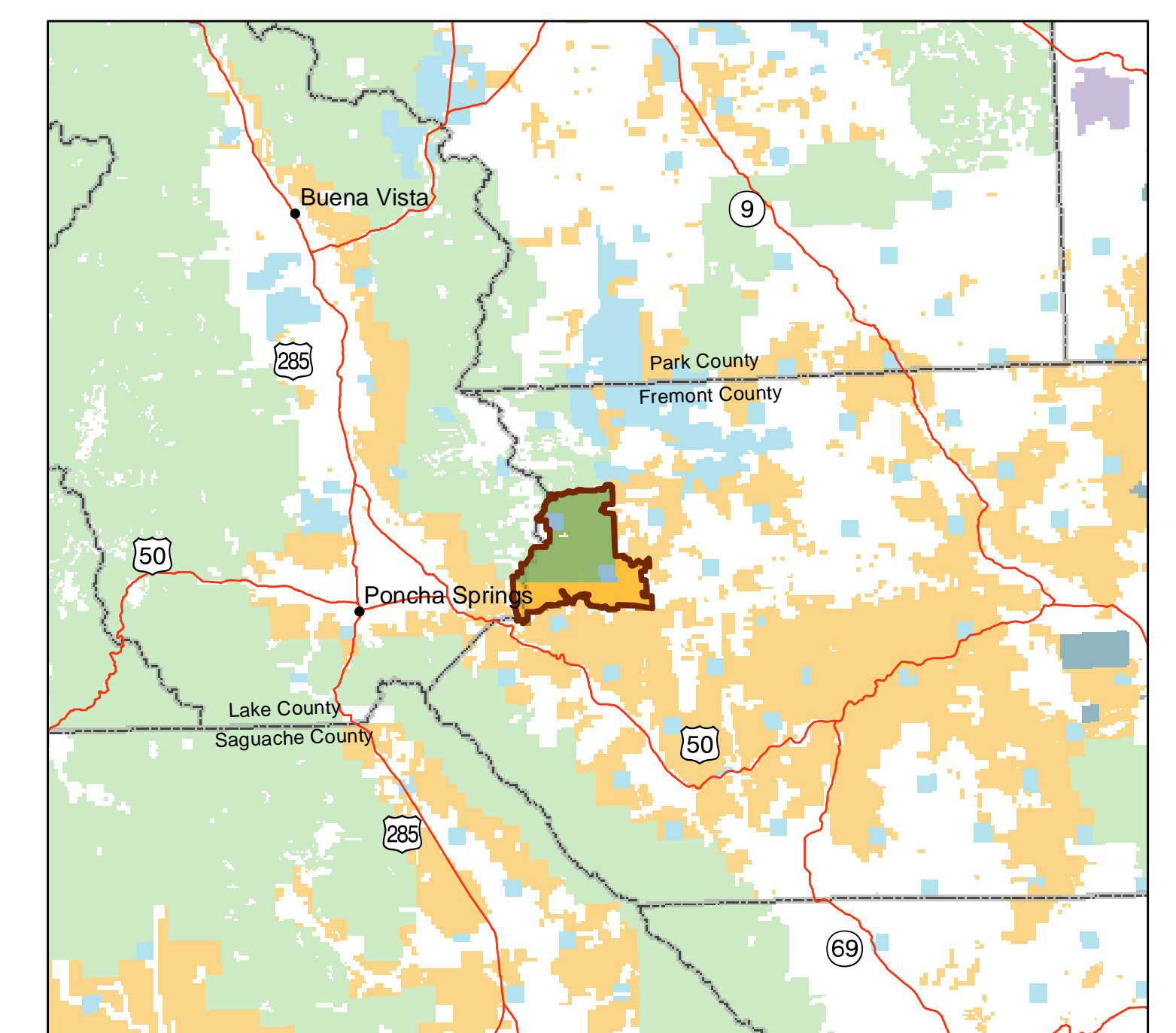
This map was prepared at the request of Representative Diana DeGette



Legend

- State or US Highways
- BLM Proposed Wilderness
- USFS Proposed Wilderness
- Land Ownership**
 - BLM
 - State
 - National Forest
 - Private Land

Regional Map



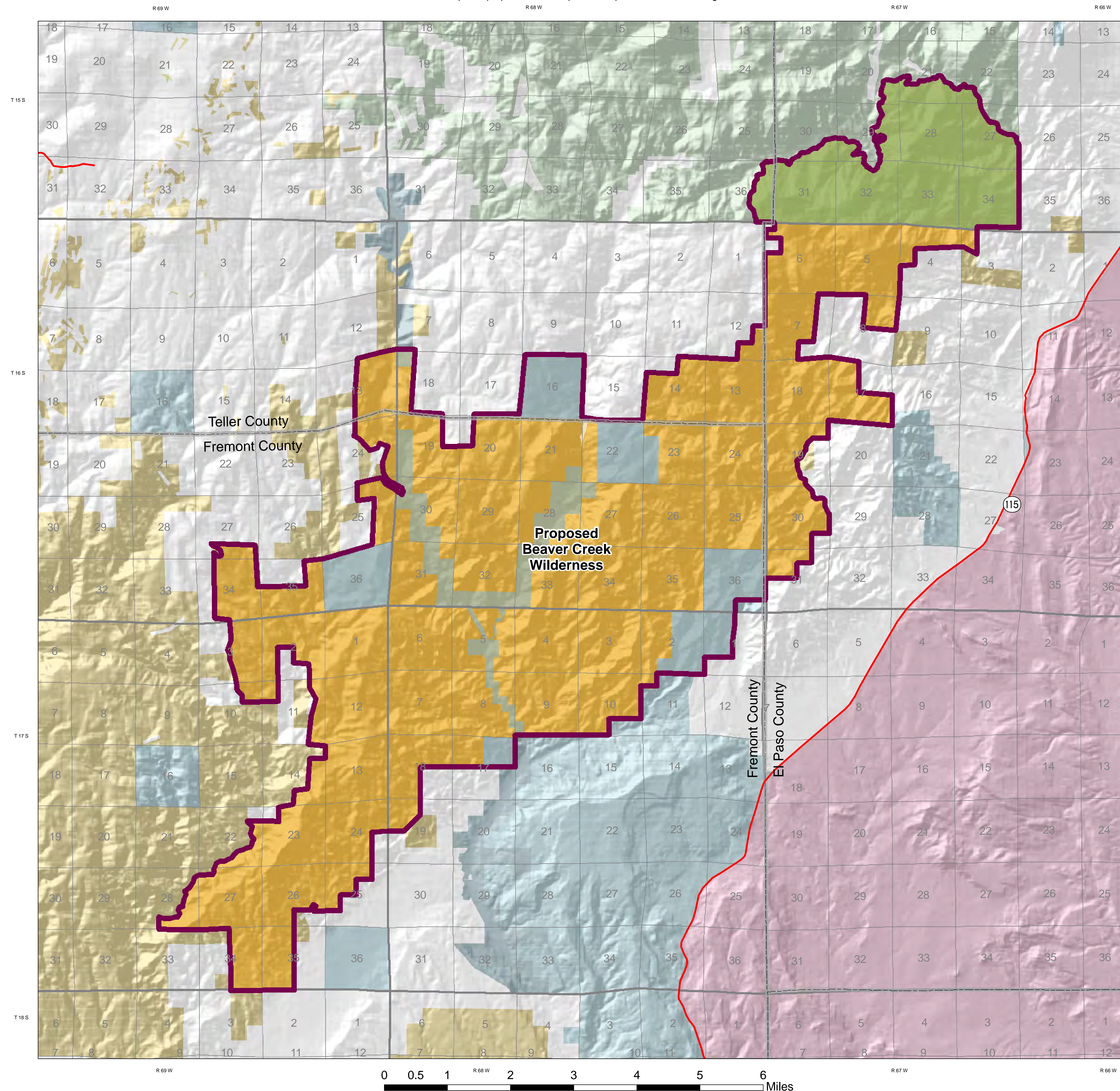
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This map was produced by the BLM Colorado State Office, September 22, 2010 T:\gis\user\coso\kschauer\badger_creek_degette_09_22_2010.mxd

Beaver Creek Proposed Wilderness Area

October 20, 2010

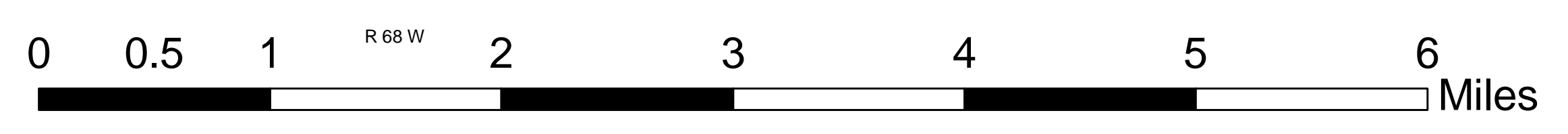
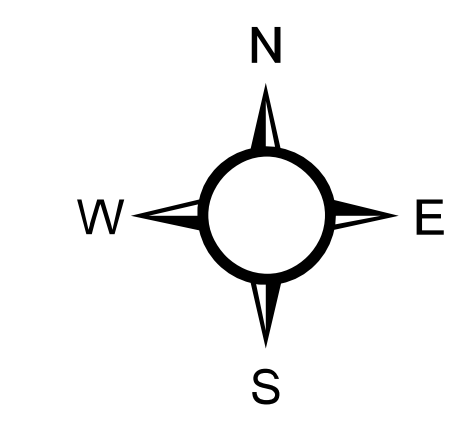
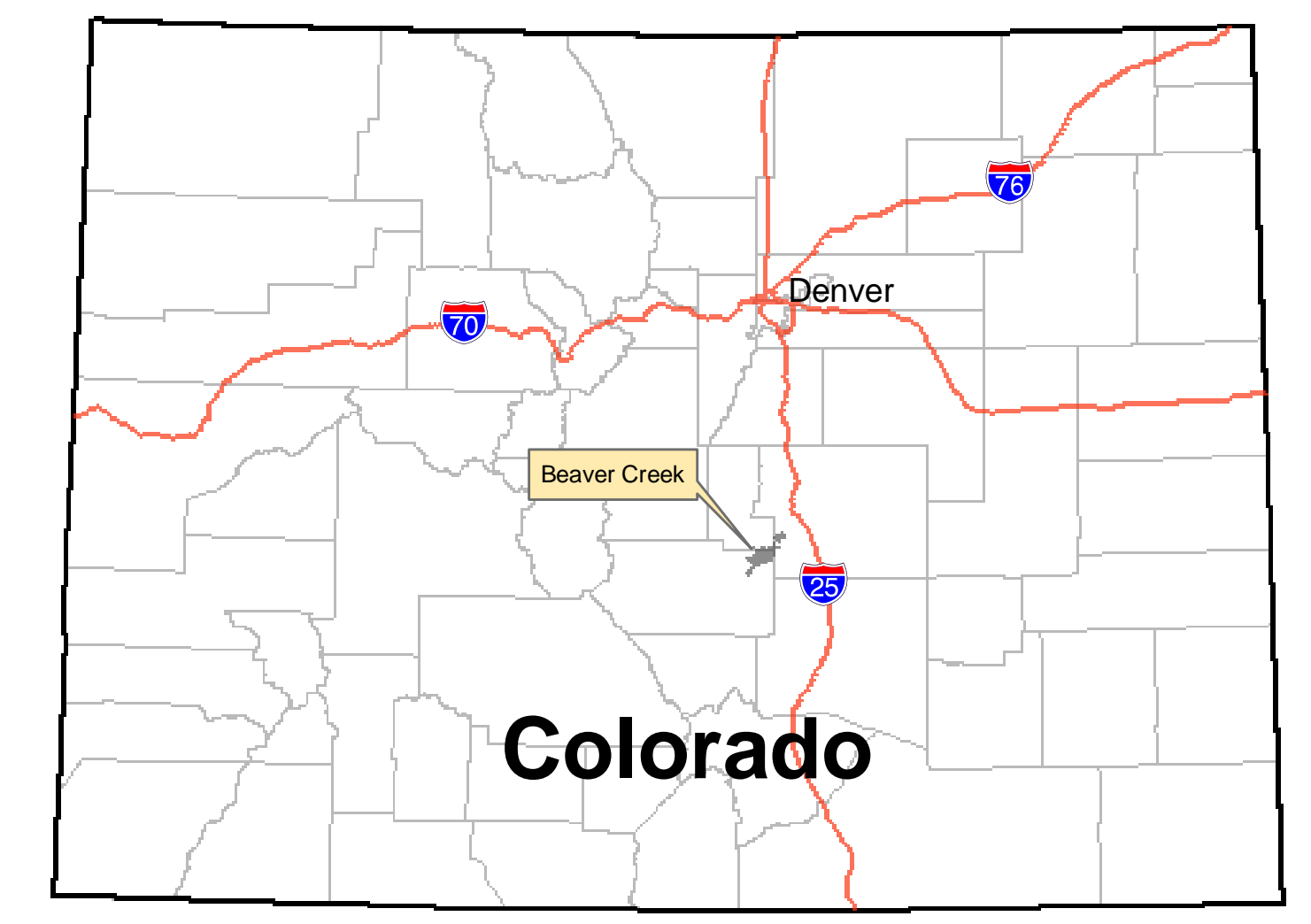
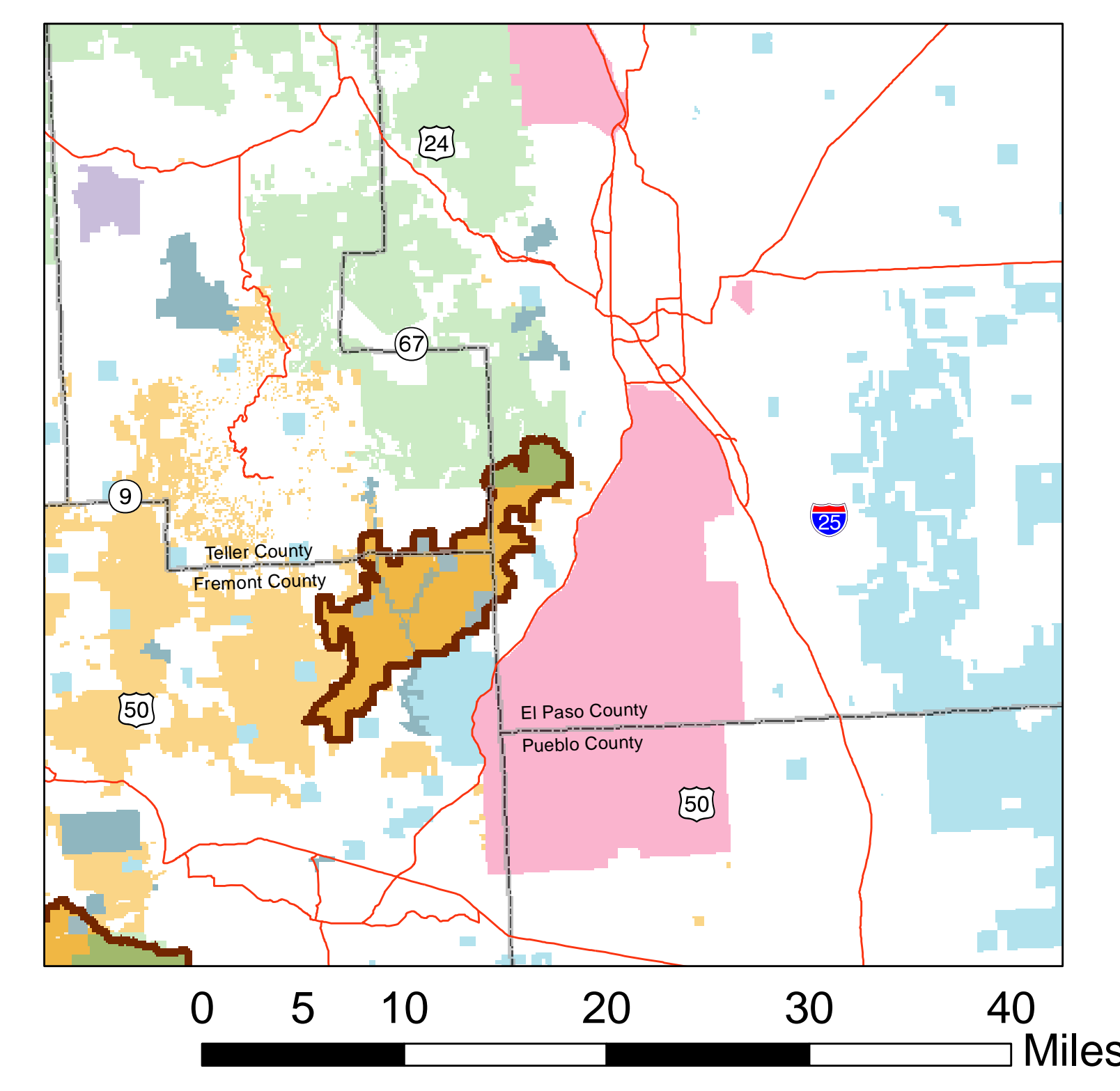
This map was prepared at the request of Representative Diana Degette



Legend

- State or US Highways
 - BLM Proposed Wilderness
 - USFS Proposed Wilderness
- Land Ownership**
- BLM
 - State
 - State Park
 - National Forest
 - Military
 - Private Land

Regional Map



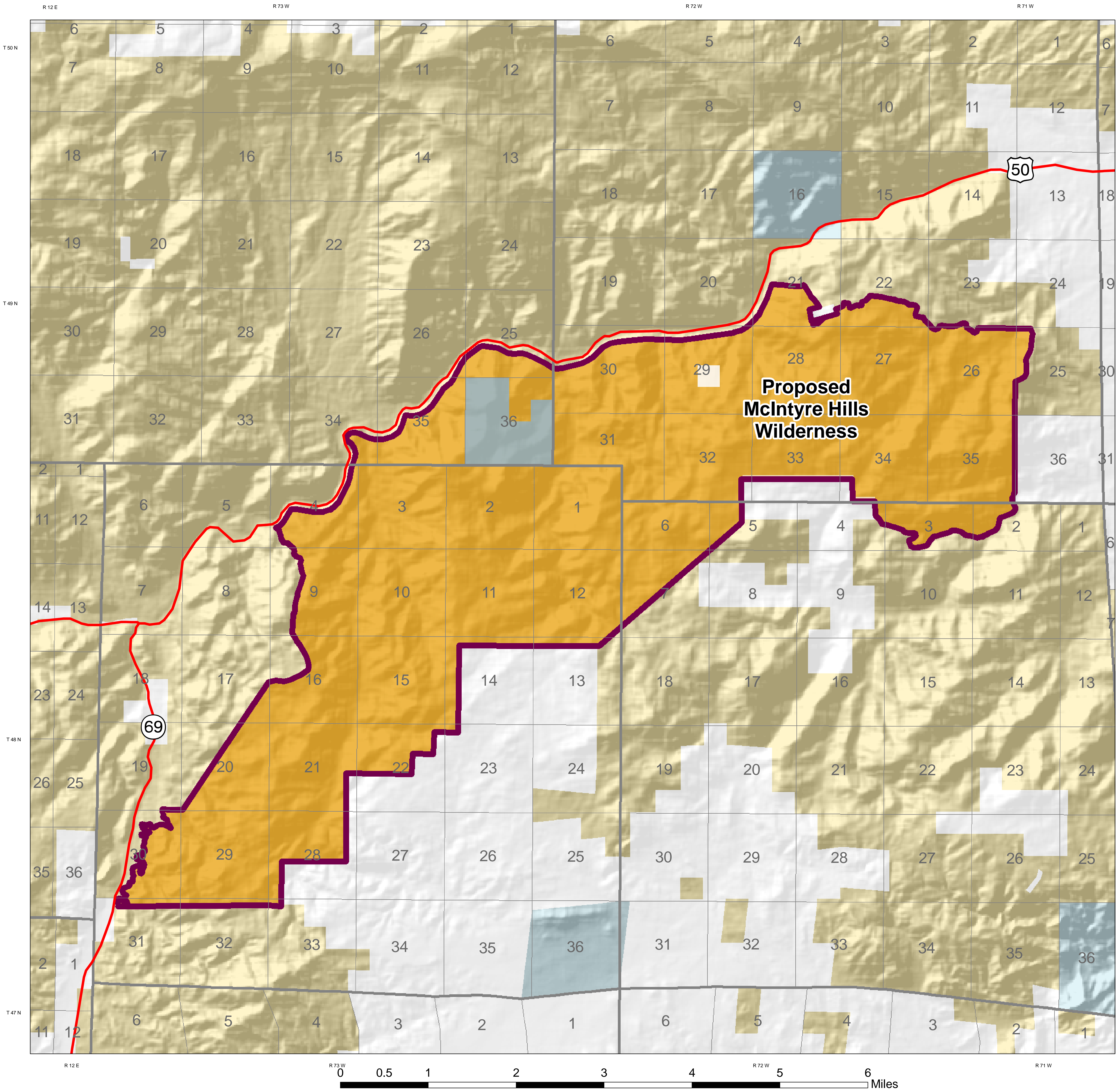
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
McIntyre Hills Proposed Wilderness Area

October 20, 2010

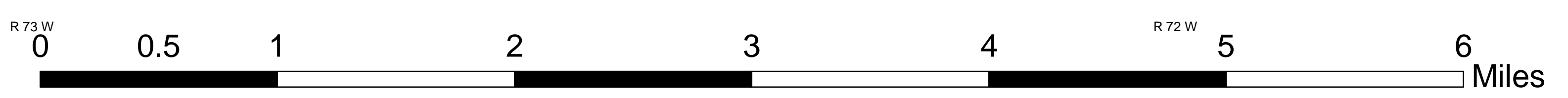
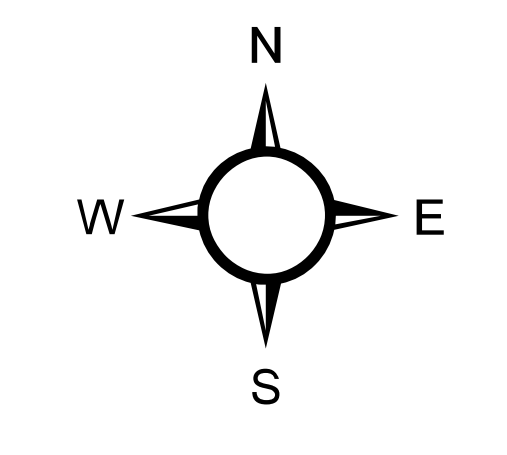
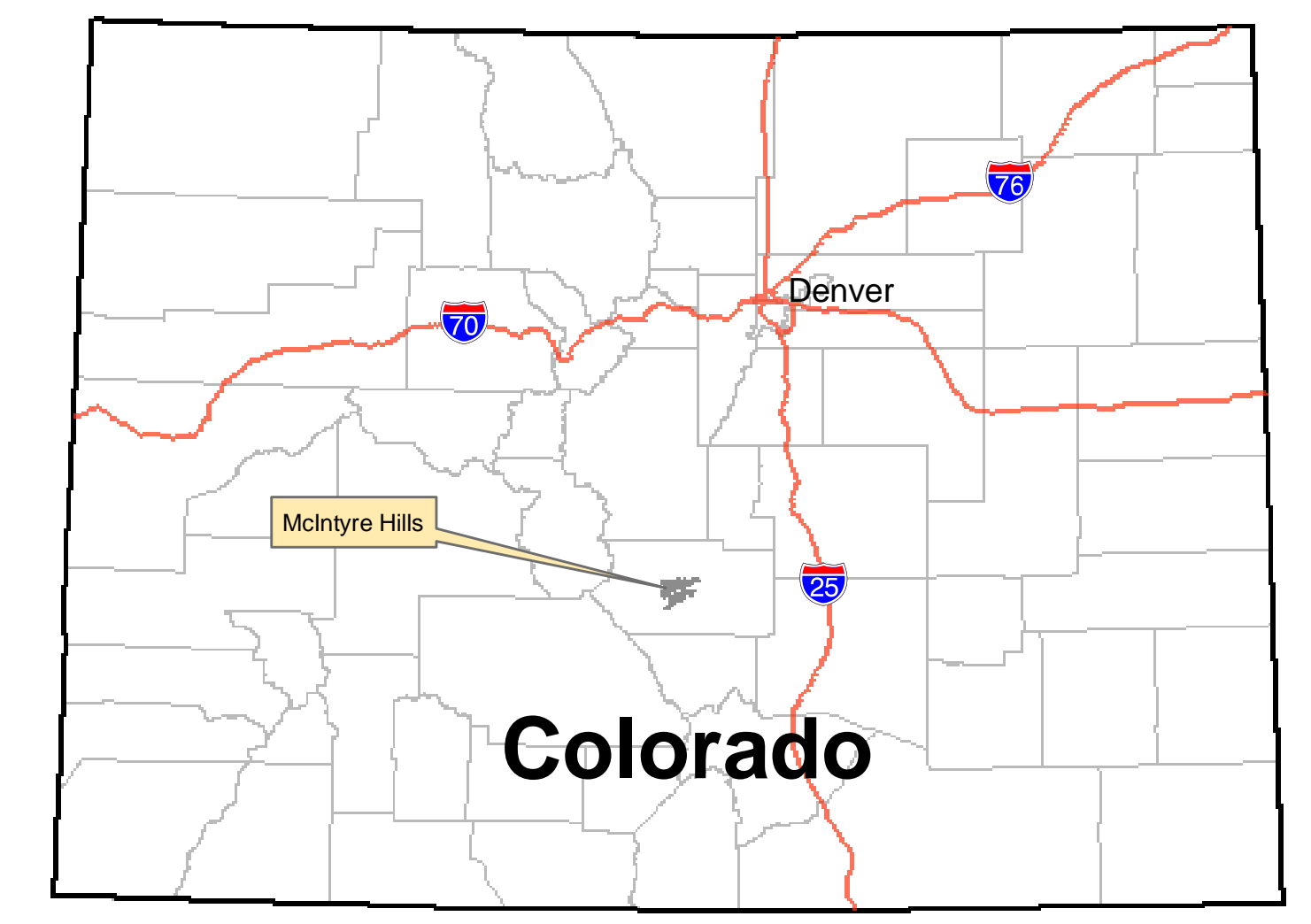
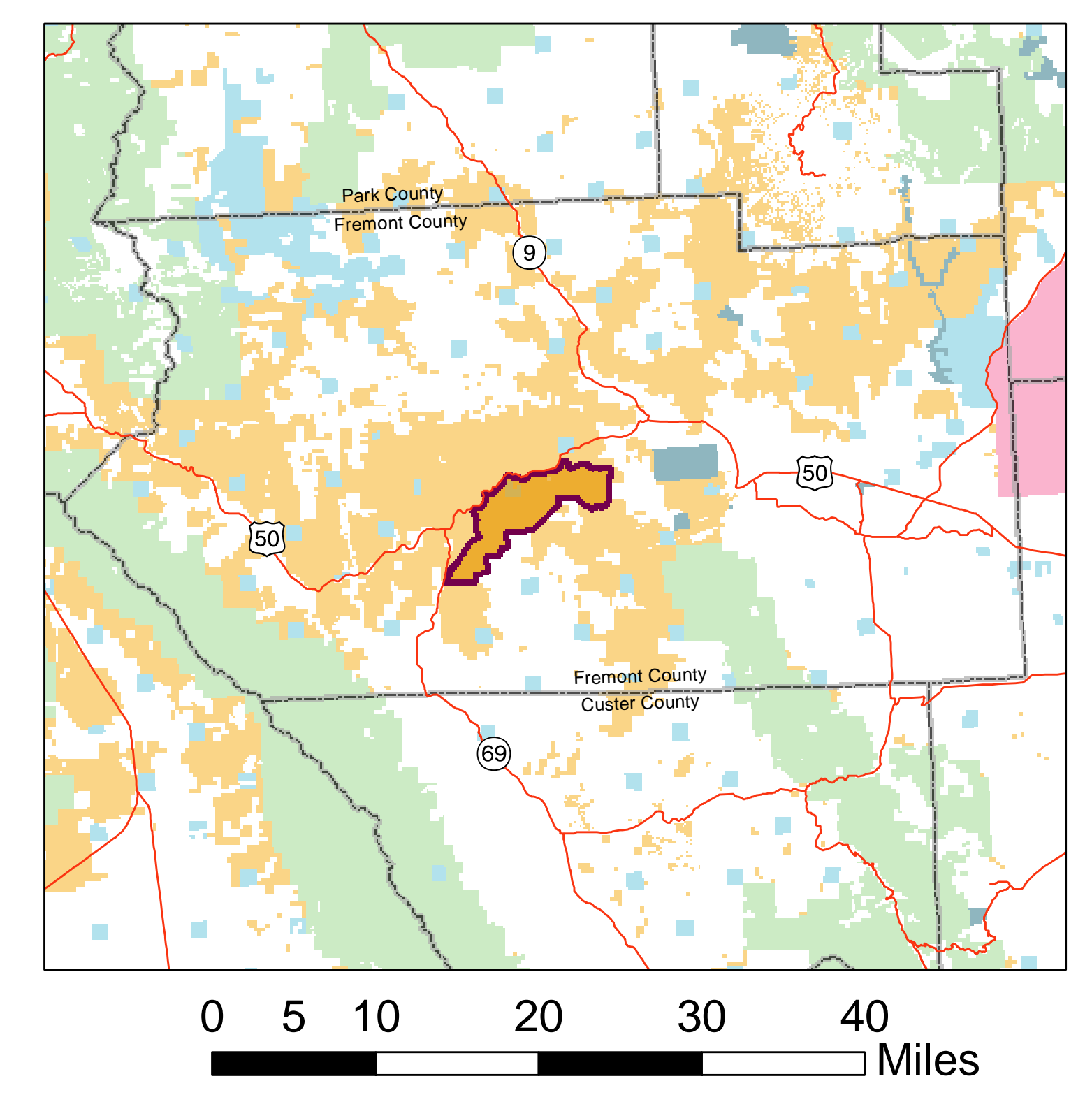
This map was prepared at the request of Representative Diana DeGette



Legend

-  State or US Highways
-  Proposed Wilderness
- Land Ownership**
-  BLM
-  State
-  National Forest
-  Private Land

Regional Map

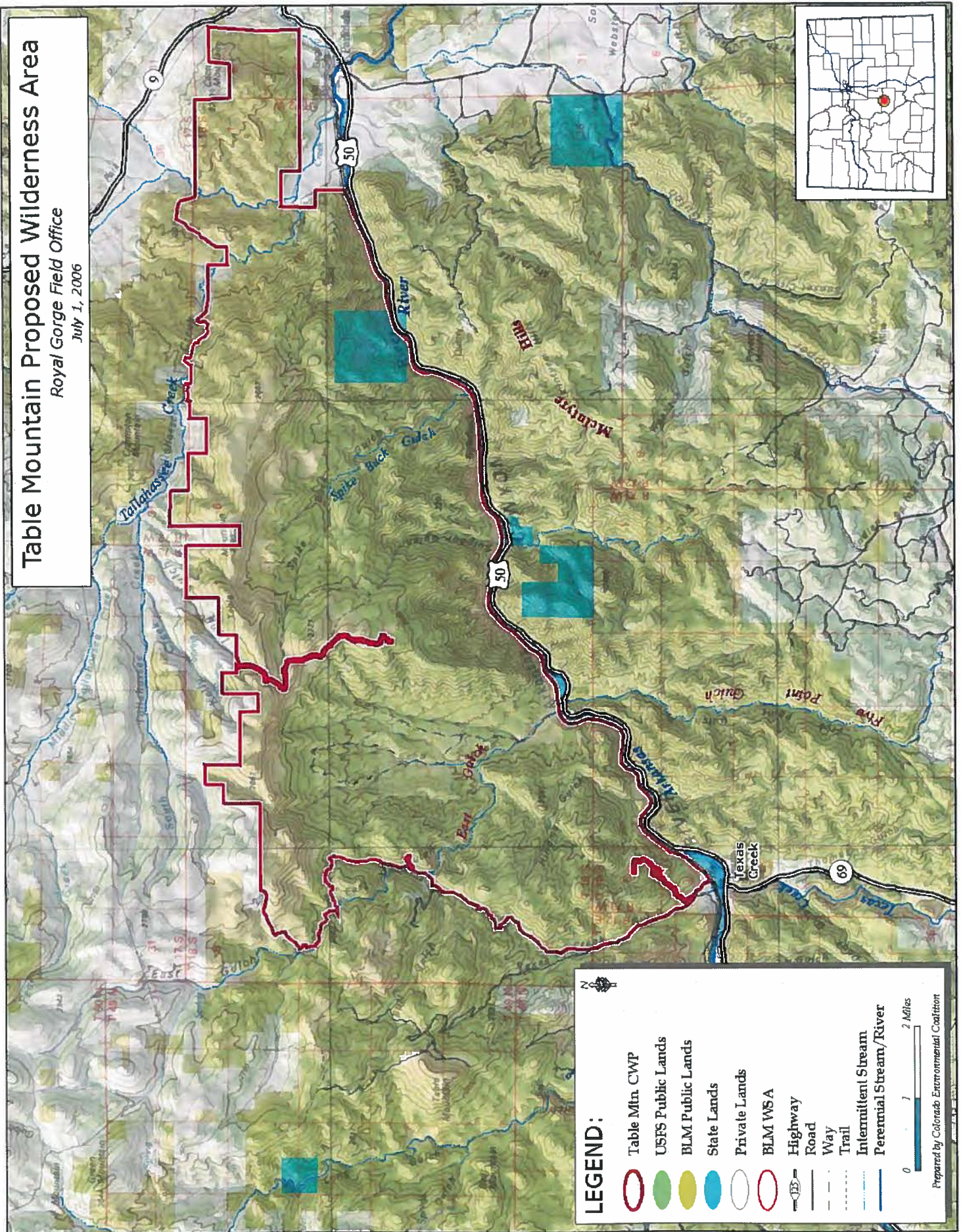


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Table Mountain Proposed Wilderness Area

Royal Gorge Field Office
July 1, 2006





Re: HAMET Comment / Request

Keohane, Nancy <nkeohane@blm.gov>

Tue, Oct 21, 2014 at 5:43 PM

To: daniel currie <dcurrie911@hotmail.com>

Cc: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, Debbie <dcurrie947@msn.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>, "ksullivan@blm.gov" <ksullivan@blm.gov>

The BLM Realty specialist in the State Office and the lead in the BLM Washington office has reviewed the Army Application and has determined a Right of Way is our course of action. I will send what you found to our realty specialist and see if it is new information for him. If you don't hear from us sooner it will be covered in the EA. Thanks for your diligent research on this.

Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Tue, Oct 21, 2014 at 5:07 PM, daniel currie <dcurrie911@hotmail.com> wrote:

Hi Nancy. Yes I was able to see the maps. Thanks.

I am not the sharpest knife in the drawer but I would think that if use of BLM lands for military training outside of Alaska is illegal then any further activity is a waste of taxpayer money. Have BLM lawyers already determined that the military training in HAMET proposal is legal? Is it possible for me to get a copy of their findings?

Dan

Date: Tue, 21 Oct 2014 16:58:03 -0600

Subject: Re: HAMET Comment / Request

From: nkeohane@blm.gov

To: dcurrie911@hotmail.com

CC: rgfo_comments@blm.gov; dcurrie947@msn.com; ja@not1moreacre.net; ksullivan@blm.gov

Thanks Dan for this comment. We have heard a similar comment in house. You will see this addressed in the Environmental Assessment. I will add this comment to our analysis.

Did your wife share that we have added some google map points to our website. I think this will allow people to drill down further for information on landing zones. Hope this helps in your review.

Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number

719-458-1308 telework number

On Tue, Oct 21, 2014 at 4:53 PM, daniel currie <dcurrie911@hotmail.com> wrote:

Hi Nancy.

I have been doing some additional research and came across a federal law entitled "Federal Land Policy and Management Act of 1976" (FLPMA, Public Law 94-579 94th Congress).

While I expect that you have direct access to it I pasted the URL below for your convenience.

<http://www.blm.gov/flpma/FLPMA.pdf>

Please pay special note to Sec. 302 (d) (1) through (d) (6) on pages 21 and 22. Stated therein the Sec. of Interior may, after consulting with the Governor of Alaska, issue to the Sec. of Defense a nonrenewable general authorization to utilize public lands in Alaska for the purposes of military maneuvering or training.

Allowance for military training on BLM lands is not mentioned in any other section of the law. It is my assertion that because the FLPMA law explicitly allows for military training in Alaska (and Alaska only) that it implicitly defines military training in any other BLM lands as unlawful.

My first request is that the BLM investigate and show proof that allowing the Army to conduct military training on BLM lands in Colorado as requested in the HAMET proposal does not violate this Federal Law.

Secondly, if by some chance it is shown to be lawful I would like the BLM to impose the same level of authorization as specifically spelled out in those same sections. Requiring involvement of the Sec. of Interior, Gov. of Colorado, and Sec. of Defense as well as any Public Safety notifications deemed necessary.

Sincerely,
Dan and Debbie Currie



HAMET Written Comments Submission

Doug Harris <dmhconsulting@comcast.net>

Sat, Nov 1, 2014 at 3:39 PM

To: rgfo_comments@blm.gov

Cc: "MG (R) Csrnko" <thomas.csrnko@gmail.com>, "Steve Dant (cell)" <sdant@chestv.com>, "Maj Gen (R) Mark Volcheff" <volcheff@msn.com>, "COL (R) Dennis Cripps" <crippsd@aol.com>, Andy Merritt <AMerritt@springsbusinessalliance.com>, Peggy Littleton <peggylittleton@elpasoco.com>


Bureau of Land Management, Royal Gorge Field Office
ATTN: Melissa Garcia (or designated representative)

The attached public land use scoping period written comments pertain to Fort Carson's High Altitude Mountain Environment Training (HAMET) Plan of Development.

Submitted on behalf of the Regional Business Alliance, Military Affairs Council and the Pikes Peak Chapter of the Association of the United States Army. Submission caveat and POC's are listed in the document. Thank you for the opportunity to comment.

Respectfully,

Doug Harris
Military Affairs Council, Defense Mission Task Force
Vice President, Pikes Peak Chapter, Association of the U.S. Army

 HAMET Comments to BLM.pdf
56K

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office area for High Altitude Mountain Environment Training since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

The scoping period will run from Oct. 1 to Nov. 1, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. To submit a comment, please contact Melissa Garcia at 719-269-8724 or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts at <http://blm.gov/3zid>.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment — including your personal identifying information — may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

JOINTLY SUBMITTED COMMENTS

October 31, 2014

FROM: The Colorado Springs Regional Business Alliance (RBA), Military Affairs Council (MAC) and the Pikes Peak Chapter of the Association of the United States Army (PPC-AUSA), both non-profit community support organizations.

TO: The Bureau of Land Management Royal Gorge Field Office

REFERENCE: Fort Carson's request for longer term use of public lands for High Altitude Mountain Environment Training (HAMET) than from 2010 to present.

The MAC and PPC-AUSA support Fort Carson's request for the following critical reasons:

- The U.S. Army's worldwide deployability combat readiness imperative, which is a national security requirement, includes the need for this vital aviation HAMET training.
- No other location in the country offers the mountainous terrain at high enough altitudes to train helicopter pilots in ***safe and proper*** HAMET flying and landing techniques and procedures, *while also providing the necessary cost effective proximity to a training base (Fort Carson Butts Army Airfield) with appropriate aviation operational and logistic support.*

High Altitude Mountain Environment Training (HAMET)

- Because Fort Carson's Plan of Development (POD) offers a feasible, practical, cost effective solution to our Army's ongoing need for aviation HAMET training, Fort Carson's importance to our national security and presence in our region is strengthened considerably.
- Department of Defense (DOD) and Department of the Army (DA) sequestration and annual budget reduction mandates, as well as the possibility of a Base Realignment and Closure (BRAC) action as early as 2017, threaten Fort Carson (and other military) downsizing in our region, which if ordered could result in a sizably negative economic impact to our state and local communities.
- The more vital Fort Carson's link is to national security requirements, the less likely the post will be significantly downsized; in fact, it could very well become an attractive realignment stationing base for other displaced DOD and DA organizations affected by budget cuts and a BRAC.
- The MAC and AUSA strongly believe that Army and Fort Carson leadership will appropriately and effectively address any and all natural and human environmental concerns submitted to BLM as a result of this process.
- If called upon, we stand ready to participate in future planning, and to offer for consideration, comments and/or potential solutions to concerns and issues that might arise during the continuation of the public process, and BLM's analysis of the Army's POD.

(UNCLASSIFIED, UNOFFICIAL, BUT OK FOR PUBLIC RELEASE WITH THIS CAVEAT)

Points of Contact:

Douglas M. (Doug) Harris, Unpaid Volunteer Military Affairs Council, Defense Mission Task Force Vice President, Pikes Peak Chapter, Association of the U.S. Army (719) 440-1025	Dennis L. (Denny) Cripps, Unpaid Volunteer Military Affairs Council, Defense Mission Task Force Member, Pikes Peak Chapter, Association of the U.S. Army (719) 237-9322
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Fwd: Ft Carson HAMET Follow-up

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Thu, Feb 19, 2015 at 10:51 PM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----
From: Doug Harris <dmhconsulting@comcast.net>
Date: Fri, Dec 19, 2014 at 1:14 PM
Subject: Ft Carson HAMET Follow-up
To: Nancy Keohane <nkeohane@blm.gov>

Seasons greetings Nancy,

Just a quick follow-up here, if I may. Checking to be sure you received the MAC/PPC-AUSA joint written comments for the extended public scoping period which ends today. Sent it on Tuesday to the email address provided on your submission form. Did you receive it? Thank you for checking.

Merry Christmas and Happy New Year to you! Doug

Doug Harris
- Pikes Peak Area Regional Business Alliance; Military Affairs Council Advisory Board Member
- Vice President - Membership, Reserve & Veterans Affairs; Pikes Peak Chapter, Association of the United States Army
- (719) 440-1025
- dmhconsulting@comcast.net

Sent from my iPhone

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office area for High Altitude Mountain Environment Training (HAMET) since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain.

Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document.

For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://blm.gov/23ld>

The scoping period will run from Nov. 19 to Dec. 19, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at 719-269-8531 or email comments to rgfo_comments@blm.gov.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment — including your personal identifying information — may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

JOINTLY SUBMITTED COMMENTS - II

December 15, 2014

FROM: The Colorado Springs Regional Business Alliance (RBA), Military Affairs Council (MAC) and the Pikes Peak Chapter of the Association of the United States Army (PPC-AUSA), both non-profit community support organizations.

TO: The Bureau of Land Management Royal Gorge Field Office

REFERENCE: Public meeting, held at Cripple Creek on Dec. 4 2014, regarding Fort Carson's request for longer term use of public lands for High Altitude Mountain Environment Training (HAMET) than from 2010 to present.

To reiterate and add to our submitted Oct. 31, 2014 written comments following the public meeting held on Oct. 7, 2014 at Canon City for the same purpose, the MAC and PPC-AUSA support Fort Carson's request for the following critical reasons:

- The U.S. Army's worldwide deployability combat readiness imperative, which is a national security requirement, includes the need for this vital aviation HAMET training.
- No other location in the country offers the mountainous terrain at high enough altitudes to train helicopter pilots in ***safe and proper*** HAMET flying and landing techniques and procedures, ***while also providing the necessary cost effective proximity to a training base (Fort Carson Butts Army Airfield) with appropriate aviation operational and logistic support.***
- Recognizing that some Plan of Development (POD) minor modifications may be needed to adequately address public and environmental issues, because Fort Carson's POD offers a feasible, practical, cost effective solution to our Army's ongoing need for rotary-wing aviation HAMET training, Fort Carson's importance to our national security and presence in our region is strengthened considerably.

High Altitude Mountain Environment Training (HAMET)

- Department of Defense (DOD) and Department of the Army (DA) sequestration and annual budget reduction mandates, as well as the possibility of a Base Realignment and Closure (BRAC) action as early as 2017, threaten Fort Carson (and other military entities) with significant downsizing in our region, which if ordered would result in a substantially negative economic impact to our state and local communities.
- The more vital Fort Carson's link is to national security requirements, the less likely the post will be appreciably downsized. In fact, given any unique strategic association with future mission-critical training imperatives — such as the intraservice and joint need for HAMET — Fort Carson could very well become an attractive realignment stationing base for other displaced DOD and DA organizations affected by budget cuts and a BRAC. Hence, as opposed to potentially having to face the insidiously displeasing negative effects of installation downsizing, the prospect of Fort Carson becoming a “BRAC-winner” could actually enhance the post's mission-essential posture well into the future.
- With due respect and appreciation for the range of issues and questions raised at two public meetings since Oct. 2014 by citizens who are, or may become, either directly or indirectly impacted by HAMET, the MAC and PPC-AUSA's viewpoint is that satisfactory explanations, or workable arrangements, alternatives, modifications, and agreements can be achieved related to nearly all of the expressed concerns. That outcome will be facilitated by the BLM's ongoing regulatory land use request process.
- Further, the MAC/PPC-AUSA position highly recommends that there be adequate fora for deliberate work-group-like dialog between the stakeholders so that all issues, concerns, complaints, etc. can be addressed in detail by all affected parties, and expediently resolved inasmuch as practical. Unresolved issues should be clearly stated for later mediation as applicable to the BLM process. This approach could be accomplished on line or in face-to-face meetings, but anyone interested in participating should be given reasonable opportunity to do so.
- Our assessment of the HAMET public comment situation thus far is that there are few, if any, citizens who would become persistent adversaries of the Army's HAMET need and training intent as long as they can be involved in, have empirical input to, and appropriately influence the outcome of the public land use process.
- Concomitantly, the MAC and AUSA strongly believe that Army and Fort Carson leadership will appropriately and effectively address any and all natural and human environmental concerns, as well as other related matters submitted to BLM as a result of this process.
- If called upon, we stand ready to participate in future planning, and to offer for consideration, comments and/or potential solutions to concerns and issues that might arise during the continuation of the public process, and BLM's analysis of the Army's POD.

(UNCLASSIFIED, UNOFFICIAL, BUT OK FOR PUBLIC RELEASE WITH THIS CAVEAT)

Points of Contact:

Douglas M. (Doug) Harris, Unpaid Volunteer Military Affairs Council, Defense Mission Task Force Vice President, Pikes Peak Chapter, Association of the U.S. Army (719) 440-1025	Dennis L. (Denny) Cripps, Unpaid Volunteer Military Affairs Council, Defense Mission Task Force Member, Pikes Peak Chapter, Association of the U.S. Army (719) 237-9322
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RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Hamet Proposal

dahhindman@aol.com <dahhindman@aol.com>

Tue, Dec 16, 2014 at 10:18 PM

To: rgfo_comments@blm.gov

Nancy, please be advised that this email contains an attachment concerning the Hamet proposal. I would appreciate a response so I know that it was received.

Thanks,
Bev Hindman

 **Hamet_proposal.docx**
17K

Don and Bev Hindman
307 Western Hills Dr.
Florissant, CO 80816
dahhindman@aol.com

RESPONSE TO HAMET PROPOSAL

December 16, 2014

We have been residents of the 4-Mile Creek area for over 40 years. We were drawn here by the area's rural lifestyle and everything that it encompasses. While we are supportive of the Armed Forces and the necessity of appropriate training, the scope of the proposed Hamet training has caused us great concern. In truth the program is nearly totally incompatible with the character of the area and would cause it irreparable harm. Some of our concerns are;

1. Wildlife is an important part of this area. As they continually face pressures from growing urban centers, this area remains one of their last refuges. A constant onslaught of extreme noise and activity would greatly interfere with this tremendous natural resource, and tourists as well as local would feel the results.
2. The conservation easements on many of the ranches in the area act to protect the historic and cultural uniqueness of the area. This uniqueness was formalized with the "Scenic By-Way" designation awarded by the State of Colorado. We feel these easements and Scenic designation will be nullified and made worthless should the Hamet program be allowed.
3. On a more practical level, many residents of the area work in mining or in the casino industry in Cripple Creek. Both industries operate 24 hours a day and many employees work late shifts and consequently sleep late in the day. Disruptive noise and activity, even in the middle of the day would prove difficult for many of these workers.

We ask you to please consider carefully these concerns and the concerns of others. Once an area has been transformed into something it was not originally intended to be as this proposal would do if approved, we would lose all that we have strived to protect.

Sincerely,
Bev and Don Hindman



Questions Re:IM 2001-030 Military Use On and Above Public Lands

Jim Smith <jimandrobertasmith@gmail.com>

Mon, Dec 15, 2014 at 4:59 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Cc: Heather Lynn <utiart@gmail.com>, share@guffeynews.com, Brian Dreher <brian.dreher@state.co.us>

Nancy,

I am a citizen of Park County (near Guffey, CO). I am extremely interested in knowing your (BLM's) responses to the military regarding their [IM 2001-030 Military Use On and Above Public Lands](#). Several of the options require congressional action. Some of the options will allow use of the landing zones as possible bomb sites for practice. The link above will take you directly to the guidance that you are supposed to use. Did the Army specify which paragraphs you are to use? Which paragraphs of this document are you going to use to authorize this military activity? Are you going to prepare a report for the citizens of Park County and Fremont County as to exactly what "Use on Public Lands" will be authorized by you? It is critical for me to know exactly how the Military will be able to use the Public Land in order for me to make a sound decision regarding approval/disapproval. If you do approve this plan, what recourse does the Public have when the Military violates the rules of the plan?

Will you provide an Environmental Impact Study on this program and if so when? and if not, why not?

Will you provide a "Private Land Impact Study" on this Military usage and if so, when? and if not, why not?

Will you provide a "Loss of Real Estate Value" report for the Public to review and if so, when? and if not, why not?

Will the Colorado Wildlife Division provide a report on their study of this kind of Military usage and if so, when? and if not, why not?

What is the BLM Plan for studying the Authorization of the Military Usage of the over 35,000 acres of BLM land plus all of the underlying Private Land?

Why are we (USA) doing training for environment "like Afghanistan"? Aren't we supposed to pull out of there by end of 2014?

I have many more questions but precious little time if the deadline for Public Comments is Dec 19, 2014. Please provide a written response at the earliest possible time.

I sincerely appreciate in advance your prompt attention to this matter.

Sincerely,

James E. Smith

Citizen of Park County, Congressional District 5, Colorado, USA

719-689-5643

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Roberta & Jim Smith

Guffey, Colorado

Fax: 1-866-679-5231

In God We Trust

No Longer Silent



HAMET

Jim Smith <jimandrobertasmith@gmail.com>

Wed, Dec 17, 2014 at 4:41 PM

To: share@guffeynews.com, Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>

For all near Guffey residents is the following picture of all the Army's proposed Landing Zones for HAMET Project. The little icon just above Landing Zone 603 is Rita's Place according to Google Earth if you zoom in on it. The pic is an image saved from the Army file using Google Earth.

--

Roberta & Jim Smith
Guffey, Colorado
Fax: 1-866-679-5231
In God We Trust
No Longer Silent



HAMET_All_Proposed_LandingZones.jpg
106K



Fwd: US Army High Altitude Mountain Environment Training (HAMET)

Jim Smith <jimandrobotasmith@gmail.com>

Fri, Dec 19, 2014 at 3:55 PM

To: share@guffeynews.com, Heather Lynn <utiart@gmail.com>, Doug Boucher <dwboucher3@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>

The following is the response I got from Doug Lamborn's office. I think he is saying that we deserve a very detailed environmental impact study from BLM and that he would support our insistence on receiving one before they approve use of BLM land. What do you think?

Jim

----- Forwarded message -----

From: Colburn, Lee <Lee.Colburn@mail.house.gov>

Date: Fri, Dec 19, 2014 at 3:04 PM

Subject: RE: US Army High Altitude Mountain Environment Training (HAMET)

To: Jim Smith <jimandrobotasmith@gmail.com>

Mr. Smith,

As per our telephone conversation I am forwarding to you and I assume to the other participants in your network the Congressman's response to your request. I have consolidated all of the various points of view of those who chose to copy our office. Then I summarized the comments we received from constituents and coordinated his response to your request as to his position. He authorized me to give you back his position below. I do understand that this issue is a very intense one for the citizens in and around the greater Guffey area. You are right to contact all of the applicable elected officials. The important point is to register those same points with the BLM officials who are accepting public input to this impact study.

+++++

"Congressman Lamborn is very aware of the proposed Bureau of Land Management (BLM) High Altitude Mountain Environment Training (HAMET) proposal with the BLM, and his staff has been attending the public interest sessions over the last six months along with the public. He is well aware that this proposal is a formalization of the existing informal temporary agreement which has been in effect to allow critical HAMET Helicopter training to occur in the past on BLM lands. The Environmental Review process has proceeded through its statutory schedule with the BLM receiving public comments in accordance with the BLM guidelines.

Congressman Lamborn believes that defense of our nation is a prime directive and the unique training environment of the Colorado Mountains is a national training asset in this essential mission. The unique training which the Colorado BLM geography provides is responsible for saving Aviators' and their troops' lives in the combat conditions of Afghanistan's mountains. However the Army's critical high altitude training program needs to be a blend of providing select sites for Helicopter Landing zones and balancing the ecological, environmental, and recreational impacts to the local residents and recreational users.

The Army program must also adhere to all Federal Aviation Authority airspace use regulations and to be sensitive to the Colorado residents' rights. This is why the Congressman supports the Environmental Impact Study portion of all federal land and airspace use programs. The current process of gathering public comments has yielded vast amounts of impact data which will allow the BLM to rule on the joint use of their federal properties."

+++++



Senior Military & Defense Advisor

Office of Congressman Doug Lamborn
1125 Kelly Johnson Blvd., Suite 330
Colorado Springs, CO 80920
P: 719-520-0055
Direct: 719-355-7562

From: Jim Smith [mailto:jimandrobotasmith@gmail.com]
Sent: Friday, December 12, 2014 5:27 PM
To: Colburn, Lee
Subject: Fwd: US Army High Altitude Mountain Environment Training (HAMET)

----- Forwarded message -----

From: Jim Smith <jimandrobotasmith@gmail.com>
Date: Fri, Dec 12, 2014 at 5:20 PM
Subject: US Army High Altitude Mountain Environment Training (HAMET)
To: Congressman Doug Lamborn <co05ima@mail.house.gov>
Cc: Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>, Mike Brazell <mbrazell@parkco.us>

Dear Mr. Colburn,

I sent this email but forgot to add your name to the CC: list. I hope to contact you personally on Monday morning around 10:00 AM. I was directed by your office to speak to you as the person in charge of addressing our issue with the US Army.

Sincerely,

Jim Smith

4858 Hwy 9

Guffey, CO

[719-689-5643](tel:719-689-5643)

Dear Congressman Lamborn,

We are very concerned about the HAMET program. The Army has applied to the BLM for a 10 year permit allowing them to use over 35,000 acres of land for Landing Zones that provide them with areas to train in low level flying and landing. The land is in Park and Fremont counties, your Congressional District.

We have just found out within the last few weeks that this was happening giving us precious little time to document our objections. I am very much hoping that you will intervene for us in a way that gives us time to document the many, many objections we have to this program so that we can submit them to the BLM. BLM has given us a deadline of Dec. 19 to provide our comments but we are a very spacious county and it is sometimes difficult to communicate with all of our very interested citizens quickly. **TIME IS OF THE ESSENCE.** Please take time to read and understand the very real objections we all have to this program of invasion.

Following are links to much of the descriptive documentation regarding HAMET and a couple of powerful statements by citizens of your congressional district that plead for your assistance.

About the proposal

The BLM Royal Gorge Field Office received an application and a Plan of Development (POD) from the US Army Fort Carson requesting the use of public lands to conduct High Altitude Mountain Environment Training (HAMET). The BLM is in the planning stages for the preparation of a National Environmental Policy Act (NEPA) document to evaluate the potential environmental effects of HAMET on BLM lands. The purpose of NEPA is to encourage public participation and actively inform the public, organizations, government agencies, Indian tribes and elected officials about the proposed action and to receive public input during the environmental review.

[Casual Use Letter](#) - The casual use letter dated May 1, 2013, represents the most recent coordination with the Army related to HAMET exercises on BLM lands.

[Plan of Development](#) - The POD represents the highest level of use the Army projects could occur on BLM lands. Current use is much less and can be found in the Casual Use Letter.

[Exhibit 1 - Area of Activity](#)

[Exhibit 2 - Helicopter Landing Zones](#)

[Exhibit 3 - Aircraft Type](#)

[Exhibit 4 - Noise Study](#)

[IM 2001-030 Military Use On and Above Public Lands](#) - This IM is a compilation and restatement in a single document of statutory, regulatory and policy guidance that affect the authorization of military activities that may impact public lands managed by BLM.

[Attachment 1 - Military Activities on the Public Lands](#)

[Attachment 2 - Definitions and Acroynms](#)

Public Meeting Documents

- [BLM Presentation](#)
- [Fort Carson Presentation](#)

- [Video \(YouTube\)](#)
- [Map 1](#)
- [Map 2](#)
- [Comment Form](#)

Map Files

[Proposed Landing Zones KMZ File*](#)

[BLM Land Ownership KMZ File*](#)

*Google Earth is the best way to open the KMZ file. Download the KMZ file to your computer, right click on the file, hover over open with, and select Google Earth.

Some Citizen Comments

Heather Lynn

In the southeastern part of Park County, Colorado, (the Guffey area), residents are facing a huge encroachment on their quiet and peaceful lives, safety and the lives of all animals both large and tiny, wild and tame. It has come to my attention that Mr. Mike Brazell has not at all been informed of this situation and so I am writing to both you and him.

The Army has a high altitude-training program called HAMET. This program includes having 47 landing zones surrounding the Guffey area. Each landing zone includes 1000m-diameter circle or over 700 acres each and the total is over 36,000 acres that the Army wants for training. This program REQUIRES pilots to fly 40 feet above the ground from one landing zone to another. So whether you live near a landing zone or not, you will be effected by the heavy aircraft flying low. When answering a question asked by fire chief, Don, of the Four Mile F.D. regarding who is responsible for responding to a crash, the Army stated, Don stated his concern over auto crashes happening when people are trying to see Flight for Life. He also stated that the airspace around Pikes Peak would be compromised if this HAMET is allowed. He was serious when he told the Army that Flight for Life will NOT be able to fly while airspace is compromised and people who are in need of life saving measures will not get them. "We will run the other way and your county or local Fire Dept. will assume responsibility both physically and financially."

The total landings the Army proposed is over 20,000 per year. The "casual use" easement the Army hopes to get, lasts for 10 years. When challenged regarding the legality of acreage allowed for this type of application and whether the Army knew this much acreage must have an Act of Congress to obtain, the Army representative replied, "NO." He said they will not reapply properly. There are many homes whose location has not been taken into account leaving many homes inside landing zones and some homes in numerous landing zones. This is because the Army used maps that they stated at a public meeting on December 4th, were in fact possibly 5 years old. The Army admitted they did not "Look under the trees."

I think it is important to note that NO announcements were shared with the Guffey Community. No one called our fire chief nor our commissioner to get the word out, no one bothered to let us know that a meeting was occurring a month ago on this issue and no one notified us when another meeting was scheduled. Unless we get the Gazette out of Co Spgs, we would not have seen the Army's press release.

...

I think it is imperative to share with you that the entire 4 Mile Creek valley is in line for designation as a Conservation Area. I would also like to inform you that the Army thinks we all live in the middle of nowhere. This is far from the truth since Guffey Gorge saw more than 12,000 visitors last summer!

Please take the time to look over the documents I have included in this email. Look carefully at the letters from the residents.

Andrea Jones

The request for a permanent grant of Right of Way for use of BLM-administered lands in Teller, Fremont, and Park counties for use by the Army's HAMET program would appear to be a de facto expansion of the Fort Carson military base. The scale of the landscape impacted by this proposal far exceeds the 234+ acres involved in the 43 specified landing zones: the boundaries of the Mountain Training Areas (MTAs) outlined in maps provided by the Army encompass thousands of acres (the tally of acreage is, rather conveniently, not provided in the Plan of Development documentation). These MTAs include extensive private property holdings. According to the Plan of Development, "A large portion of the qualification course (HAMET) requires aircrews to conduct Mountain Navigation as a task" (3.f). Mountain Navigation calls for low-level flights, as low as 80 feet, which would be permitted throughout the MTAs, apparently without regard to the individual or agency who owns the underlying property. The ramifications of this plan extend well beyond the land holdings of the BLM, and the grant of Right of Way by the BLM for the Army's plan as it is written is clearly an overreach. A BLM Right of Way agreement does not address the effects of noise and the sudden appearance of fast-moving helicopters that will occur throughout the MTAs, including over private property.

Assuming, however, that the current review process is the appropriate and legal channel for this action, I do not see how the Plan of Development can be reconciled with the BLM's mission to "manage and conserve the public lands for the use and enjoyment of present and future generations under a mandate of multiple-use and sustainable yield."

From a wildlife management standpoint alone, disturbances from an annual minimum of more than 2100 proposed landings, with associated low-level exercises and transit flights, should be grounds for rejecting this Plan of Development. Noise from flights transiting to and from the landing zones at the specified minimum altitude of 500 feet would qualify as a "highly" annoying to a significant proportion of people, based on the Army's noise study—which does not account for potential amplification of noise by the mountainous terrain. Wildlife sensitivity to noise will be even higher. Direct effects, such as panicked flight into fences or ravines, will cause injuries and death not only around the landing zones but also throughout the much larger MTAs as a result of low-level flying. More indirect impacts on migration and feeding patterns will undoubtedly occur throughout the MTAs, violating the ideal of sustainable yield.

Disruptions of game species will, in turn, affect hunting, which is a part of the BLM's multiple-use mandate. Other conflicts with multiple-use include livestock grazing (cattle will be subject to the same disruptions as wildlife) and outdoor recreational activities. Given the potential for "continuous sorties throughout the year" (Section 3.c.1), hiking, camping, biking, and horseback riding will be virtually impossible around the landing areas, where helicopters will be allowed to fly as low as 25 feet in Contour and Nap of Land maneuvers. Noise and fast-moving aircraft will, once again, affect all users (and landowners) throughout the MTAs, which extend from Highway 50 to northwest of Cripple Creek. Helicopter noise will extend to Cripple Creek, Victor, Cañon City, and the Gold Belt Tour Scenic Byway, with potentially significant economic implications for the region's tourist economy. At a time when Cañon City is trying to build a reputation as an outdoor recreation destination, granting permanent military use of vast swatches of the local landscape is counterproductive.

On a more personal note, the MTAs lie to the east, south, and west of our property. Having experienced HAMET operations conducted under the Casual Use agreement between the BLM and Fort Carson in 2012, I am aware of the effects of helicopter flights in this area. The noise and disruptions from low flying aircraft under the proposed plan would mean a wholesale lifestyle change for us and our neighbors. We will be affected by virtually all of the proposed flights, since helicopter landing activity in Training Areas 7 and 4 is audible at our home throughout the landing operations, and use of areas 5, 6E, and 6W typically involves overflight of the area where we live. Noise will affect our local wildlife populations, which include elk, deer, bighorn sheep, bear, mountain lions, and bobcats in addition to smaller mammals and birds. I work from home, and noise and disruptions from helicopter traffic threaten both the natural ecosystems about which I write and the conditions of serenity that enable that work. Having experienced multiple violations of the 500' minimum flying altitude during the 2012 operations, I am concerned that the current Plan of Development offers no provision for landowner recourse when such violations occur. This is of particular concern because we own horses, who are subject to bolting when a helicopter blasts over the ridge. This is not only a risk to the horses' safety but also to that of me and my husband if we are riding at the time.

This area is a patchwork of public lands, ranches, and rural subdivisions. Undeveloped areas provide wildlife habitat as well as scenic beauty, outdoor recreation opportunities, and pasture land. People move to a place like

this in large part because it is quiet. The HAMET program is not only a direct threat to quality of life, but will also impose negative economic pressures on residential landowners. Land values are based largely on intangible aesthetic factors such as scenic vistas, intact natural areas, and serenity. Although helicopter flights don't necessarily ruin the view, their disruptions to local ecosystems and quietude certainly conflict with other perceived values. Residents—particularly those with property inside the boundaries of the MTAs—will likely see property values decrease, and those who might elect to move to escape the noise may find it difficult to sell their property at market values comparable to either historic levels or to areas that are not encumbered by what will be a military exercise zone, in fact if not in name.

If the BLM does decide to grant a Right of Way for this program—and, again, I question whether the agency has the authority to permit a program with such extensive implications for private landowners—restrictions should be put in place that limit flying days, either in the form of specified flying periods or a defined number of days that flying is allowed on an annual basis. The 2012 operations set a precedent for the former model. While the intensity use during those periods was unpleasant and doubtless put enormous stress on the wildlife of the area, I feel that regulating flying days in this way is a lesser evil than granting the Army an unrestricted Right of Way for “continuous sorties throughout the year” over a landscape loved by me and my neighbors.

--

Roberta & Jim Smith
Guffey, Colorado
Fax: [1-866-679-5231](tel:1-866-679-5231)
In God We Trust

No Longer Silent

--

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No Longer Silent

HAMET Impact and my experience with Air Force Site Surveys

The High Altitude Mountain Environment Training (HAMET) brings to mind a series of site surveys I conducted as a Captain/Major in the United States Air Force for the Ground-based Electro-Optical Deep Space Surveillance System (GEODSS) in the 1970s. This system is now operational as the United States primary deep space satellite detection and tracking system worldwide. There are GEODSS sites in New Mexico, Hawaii, Diego Garcia in the Indian Ocean, and a partial site in southern Spain. There had been a GEODSS site in South Korea, but it was closed due to poor weather. I did the GEODSS site surveys for the New Mexico, Korea, and Hawaii sites, and also for a potential site in Morocco that was changed to Spain for political reasons. I was scheduled to do the GEODSS site survey in Iran but it was cancelled at the last minute because of the Iranian revolution, leaving Diego Garcia the only alternative.

One very important aspect of these site surveys was the on-the-spot ground assessment of each potential site and the travel routes to those sites. If you do not go there in person, and actually measure and assess the exact current condition of the property, you can be in for some very unpleasant surprises when you attempt to build on and use the proposed site.

Example 1. The Korean site selected was on the west side of a mountain just west of Taegu. That side of the mountain was protected from adverse lighting and cloud patterns that can seriously impact an optical site. I made several hours of measurements of night-time lighting conditions on the shielded side of the mountain, and another assessment of the Taegu side of the mountain, and determined the shielded side was suitable, but the Taegu side was not. Several years later, when it was time to build the site and install the equipment, the USAF discovered that somebody else had built a dairy farm on the shielded side of the mountain. That site was no longer available so the USAF decided to use the unshielded side of the mountain. Several years and millions of wasted dollars later, the site was closed due to inability to perform its mission efficiently. If we had known about the new dairy farm, we would have changed our plans.

Example 2. When we were evaluating potential GEODSS sites in New Mexico and Arizona, we selected a dozen or so potential sites based on aerial surveys, ground maps, current facilities, and travel brochures. Then we went and visited every one of them with a team of about a dozen experts, and included devices to measure the sky brightness at night, interference from lights, radio or radar, even the quality of well water. Several sites were rejected due to bright lights from nearby cities or bases. One otherwise wonderful site, the abandoned Moriarity Air Field east of Albuquerque was rejected because of interference from bad spark plugs in trucks traveling along the nearby newly built Interstate Highway 40. We had never considered that factor until we visited the exact spot in person. We also rejected several bases in Arizona after having visited the exact spots chosen from the map-based surveys. Instead we picked a secluded spot on White Sands Missile Test Range, near Socorro, New Mexico. The primary GEODSS site is operational there today. It is performing even better than expected.

Example 3: The GEODSS sites needed to be distributed fairly evenly in Longitude for proper coverage of the various orbits of deep space satellites, and should be within about 45 degrees North or South Latitude, and be at a high altitude if possible. One site had to be somewhere in the Pacific Ocean, probably Hawaii. There was a USAF optical observatory on top of Mount Haleakala on Maui, and that site was the automatic choice. Nevertheless we went there in person, and did a complete ground survey even though there were really no other options. We discovered a lot of factors we had not learned from the map and aerial surveys. There were buildings there that nobody talked about. One low building with horizontal slit windows overlooked the airburst nuclear tests that had been conducted from Johnston Atoll some years earlier. It was not documented, photographed or mentioned. We couldn't use that spot, although it looked good on the map survey. We found out that the top of Mount Haleakala is porous lava and we would need four to eight times as much liquid concrete to build our foundations because the lava soaked up concrete like a sponge. We learned that we could not disturb the Silver Sword plants because they are endangered and flower only once in a lifetime. Can't dig there, find another spot. We did. The Air Force has a GEODSS site on Mount Haleakala today, modified to fit the space.

We learned that every time you want to use a piece of land for a military purpose, you don't just get your way because you want to use it, even if it is public land. You have to do an on-the-spot ground survey and verify that your choice breaks no rules and does no damage.

If it is private land, you can't fly over it if you travel below Federal Aviation Administration 500 foot elevation limits. We had to get specific permits to airlift equipment into a site.

Questions:

1. Has the Army visited, in person, each and every exact proposed landing spot, on the ground, to verify that the HAMET operation would not interfere with current legal use of that land? Such documentation, if it exists, must be made public. An aerial survey will never suffice.
2. Has the Army planned, documented, and trained (or plans to train) pilots to ensure that their flights will not drop below 500 feet above ground level when such flights are over private land? Because some public (Bureau of Land Management) lands may be used for multiple purposes, what plans has the Army made to ensure that HAMET does not interfere with legitimate civilian uses such as camping, fishing, and hiking? Do flight plans avoid private homes and property?
3. Will the Army give public notice of any and all HAMET exercises/events so that civilians in the flight path can be prepared to deal with the potential disruption to the native peace and quiet?

Douglas W. Boucher, Major, USAF, Retired
3980 County Road 71, Guffey, CO 80820
Phone (719) 689-0987
Email: dwboucher3@gmail.com



HAMET at Mauna Kea

Jim Smith <jimandrobotasmith@gmail.com>

Thu, Dec 18, 2014 at 4:06 PM

To: Verene Posavad <vposavad@aol.com>, Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>, share@guffeynews.com

Check this link out [HAMETMaunaKea](#) and see it is very revealing in some ways. The citizens of Hawaii were alarmed just like us but the training was already done for a 1-year deployment in Afghanistan in 2012 for only 3 landing zones on an almost barren volcano top. What they want here in Colorado is massive in comparison with over 35,000 acres and for a period of **10 years. And they are trying to shove it through before we find out about it.** Call your Congressman, call your Senators. Who are they training for? Us? We are leaving Afghanistan. Where are these guys going? When? Is there going to be a war we don't know about? Sometime in the next 10 years? Check it out?

Thanks,
Jim

--

Roberta & Jim Smith
Guffey, Colorado
Fax: 1-866-679-5231
In God We Trust
No Longer Silent



HAMET Program Comments (Short Version)

KC Jones <kcj@ccvnet.net>

Tue, Dec 16, 2014 at 7:00 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

1. To minimize noise complaints, the Fort Carson noise study requires its helicopters (1) to fly above 500 feet while off the post or, (2) if in a low altitude training route flying below 500 feet, to stay 0.43 miles away from houses, livestock, and moving vehicle traffic. The HAMET program helicopters should comply with these same rules. Mountain Training Area boundaries and Landing Zone locations should be modified to permit these noise control rules to be satisfied.
2. The BLM should permit the Army to construct a heliport with refueling facilities on BLM land in the vicinity of Hwy 9 halfway between Canon City and Guffey to maximize training efficiency and minimize the need to refuel back at Fort Carson.
3. BLM should ensure the final HAMET agreement with the Army includes the right for the BLM to curtail Army use of BLM lands for helicopter training if military training helicopters fail to comply with HAMET policy agreements. Use of this contingency clause should be imposed for any length of time the BLM considers to be appropriate.

To: Nancy Keohane, NEPA Specialist

From: Kenneth C and Luanne L Jones
420 Elliott Dr
Florissant, CO 80816
Phone: 719-689-6136 Email: kcj@ccvnet.net

Subj: **Comments on Fort Carson HAMET Program**

Dear Ms. Keohane,

My wife and I are residents of Lakemoor West Subdivision which is located inside proposed Mountain Training Area No. 7 of Fort Carson's HAMET program. We have the following comments for your consideration:

POPULATION DENSITY – The proposed Mountain Training Area (MTA) 7 is located in an area of Teller County that has a relatively high civilian population density. The figure below shows proposed landing zones (LZ's) 701 through 706 which are identified with red circles. LZ 410 is also shown and is just 600 yards south of the subdivision. Homes associated with the Lakemoor West Subdivision are shown in green. Homes shown in yellow are in neighboring subdivisions or are not associated with a subdivision. In addition to the homes shown in the figure, many lots are also used for RV camping, and additional homes are being built each year.



As is readily apparent, helicopters flying to and from MTA 7 and between the LZ's within MTA 7 (which is the Army's stated practice) would clearly have a significant adverse impact on large numbers of families living in this area.

Fort Carson's HAMET Plan of Development document states there could be as many as 1440 “non-tenant” landings and 1440 “non-tenant” take offs per year for each of the 6 landing zones in MTA 7 and landing zone 410. In addition, the document says there will be approximately 16.25 “tenant” landings and 16.25 “tenant” take offs per landing zone per year. Their document implies that landings and take offs are typically separated by a 30 minute period on the ground. If their numbers are correct, this implies that there could be as many as 20,000 take off or landing events in the area of the subdivision each year. We believe that any reasonable person would consider even a small fraction of this level of activity to be totally unacceptable in a populated civilian area.

LANDING ZONE ACTIVITIES – The Fort Carson document states that no maintenance, material storage, or refueling activities will be conducted in the BLM landing zones. However, we note that an unusually large number of proposed landing zones scattered throughout each of the Mountain Training Areas have road or jeep trail access. Landing zones near roads seem to be a poor choice because of the increased likelihood of encountering recreational users on that land, especially since the Army is implying that they have no need for road access. A possibility is that the Army prefers to have as much road access as possible in the event of a mishap requiring helicopter recovery or fire fighting actions. The HAMET document also implies that there will be a limit of two helicopters at a time in a landing zone. This raises the question of why landing zone sizes up to 19 acres would be needed.

The follow figures show landing zones in relatively close proximity to roads. These roads are not easily identified on Topo maps but show up on higher resolution Google Earth images.









The coordinates of Landing Zone 508 above appear to be slightly in error.











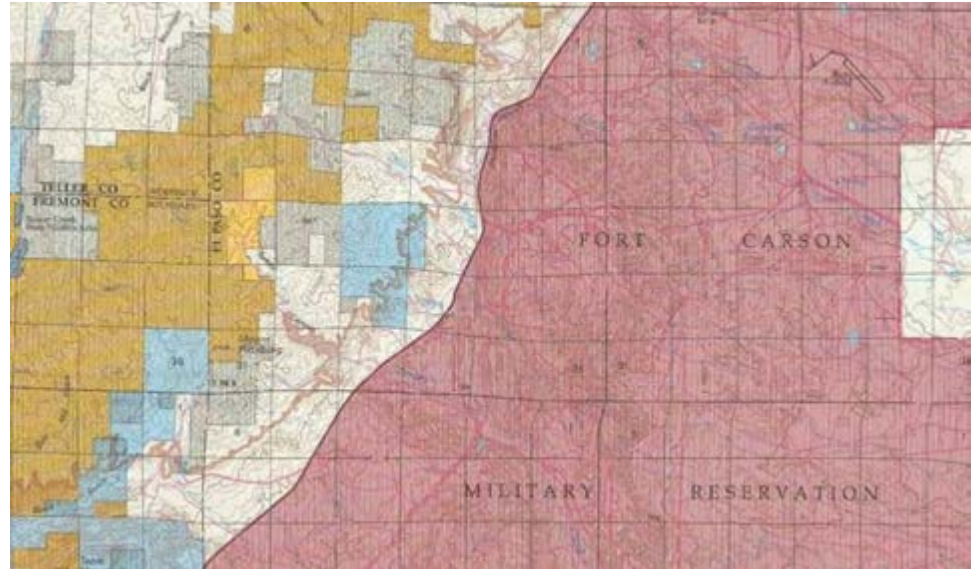


One of the landing zones near a road is 506 which we also note is at an elevation of only 6268 feet. Since there are numerous areas on the Fort Carson base with higher elevations than this, one must conclude that this “high altitude” landing zone was selected for some reason other than “high altitude.” We suspect that it was selected because it has relatively good road access and is only 8 miles north of Canon City. As a result, we are concerned that the long range Fort Carson strategy is to eventually petition you to grant them the right to refuel their aircraft at a few selected landing zones on BLM property, as was their previous practice on Forest Service property. The pressure on them to do this will be great because the flying distance from their base refueling facilities to the proposed HAMET landing zones are up to sixty miles which will have a significant negative impact on available take off and landing training time. The possibility of future refuelings at landing zones is of special concern for us because Landing Zone 703, located on the hill immediately above our house, also has road access and might someday become the refueling site for Mountain Training Area 7.

ALTERNATIVE APPROACH – While the HAMET landing zones proposed by Fort Carson generally tend to be usable without the need to clear obstacles, their distance from the base is a definite negative.

In the case of Mountain Training Area 7, and possibly others, the landing zones are located on small BLM parcels which tend to have fairly good access meaning that they will tend to be more heavily used by the public for recreation and by ranchers for grazing. We note that BLM lands closer to Fort Carson (e.g., 10 to 15 miles from Butts Army Airfield) are available. In the Figure below, Fort Carson is shown in purple. Nearby BLM lands are shown in yellow.

These BLM lands tend to be large parcels with few roads which naturally limits ground access by the public. These lands also tend to be mountainous with elevations in the 8,000 to 10,500 foot range which appear to meet the elevation requirements for HAMET landing zones. An improved HAMET approach might be to grant Fort Carson long term right of ways well inside the BLM parcels closer to the base while also granting them permission to clear small areas (e.g., 400' x 200') at high points suitable to land two helicopters. There would never be a need to refuel on BLM lands and there would also be little or no impact on the public. Training efficiency (take offs and landings per day) would be increased. In addition, impact on the public due to a mishap or fire would be minimized or eliminated.



Sincerely,

Kenneth C. and Luanne L. Jones

P.S. I recommend that you have the Army check the validity of Landing Zones 504 and 506 which appear to not be located on BLM land (yellow). This conclusion is based on the latest BLM.kmz file I could find. Other marginal LZ's include 410 and 606.





Fwd: Re: HAMET

KC Jones <kcj@ccvnet.net>

Sat, Nov 1, 2014 at 9:37 AM

To: Nancy Keohane <rgfo_comments@blm.gov>

Correction: The last LZ mentioned below should have been 705.

--- Begin forwarded message:

From: "KC Jones" <kcj@ccvnet.net>
To: "Keohane, Nancy" <nkeohane@blm.gov>
Subject: Re: HAMET
Date: Fri, 31 Oct 2014 18:18:02 -0700

Nancy,

Thanks for your efforts on your HAMET web site.

Observations:

[EXHIBIT 2](#) (Helicopter Landing Zones)

Landing zone 403 has moved significantly compared to the [PoD](#)

504 has not moved, but it does not appear to be on BLM Land

506 moved a little. It also does not appear to be on BLM Land

508 moved out of the trees and into the field.

509 moved across creek ... closer to the road. They seem to like roads.

510 moved a little.

511 moved a little.

604 They will need to move a little or cut down your trees.

613 Exhibit 2 location does match coordinates but is close.

702 moved a little and coordinates are not quite right.

706 The marked LZ rectangle comes very close or hits private property where a house is being built.

KC Jones
Lakemoor West Subdivision

Mountain Training Area 7



HAMET IMPLEMENTATION SUGGESTIONS

1 message

KC Jones <kcj@ccvnet.net>

Mon, Jan 12, 2015 at 11:51 AM

To: Keith Berger <kberger@blm.gov>, Nancy Keohane <rgfo_comments@blm.gov>

BLM is in a good position to implement HAMET in a way which allows the Army plenty of flexibility to conduct their training while also protecting the Public from excessive helicopter hazards and noise.

Because accomplishing this will require some work, I have done most of it for you ... but more about that later.

Based on the Army's proposed plan of development, the Army would clearly like to be free to fly just about anywhere and at any altitude they want without regard to the Public. This is demonstrated by the fact that their plan would allow them to fly anywhere in the very large proposed Mountain Training Areas at any altitude down to 80 feet. Mountain Training Areas where they would do this are largely composed of private property which includes many residential areas. I had no idea how many houses were located in these areas until I generated the attached HAMET.kmz file. A helicopter flying overhead at 80 feet is very loud and would be considered much worse than "very annoying" by just about everybody.

Based on the Army's proposed Plan of Development, they would also like to be free to fly at ANY altitude down to just above ground level while within 1000 meters (0.62 miles) of a landing zone. These areas near landing zones would be expected to have the highest density of helicopter traffic. In the case of Landing Zones 408, 410, 616, 701, 702, 703, 704, and 705 this would allow them to fly frequently over residential homes as low as they like.

The FAA does not impose Minimum Safe Altitude limits on helicopters and they do not want to get involved with regulating

Military training exercises. Their general requirement on helicopters is that helicopters may fly as low as they like provided they can do so safely. In this case, "safely" means that the helicopter must be able to avoid buildings, people, and property if they experience a "failure" such as a loss of power. In general, a fixed wing aircraft is expected to stay above 2000 feet while over a congested urban area to permit the plane to glide to a safe landing (crash) site without hitting buildings or people. While helicopters can glide to some extent, they are going to come down pretty quickly following a loss of power. The bottom line is that if numerous Military helicopters are going to be routinely training near private homes, BLM should ensure that, while over or near private homes, the helicopters are at sufficient altitude to minimize the likelihood of hitting anything important if a failure occurs. In addition, BLM should also try to ensure that routine and frequent Military training flights over and around BLM lands do not subject the public to excessive noise levels. This can only be accomplished by keeping the helicopters at a sufficient distance away from private homes. Since HAMET is expected to produce many thousands of flights per year, allowing uncontrolled low level flights anywhere within the overall training area, including residential areas, could be very damaging.

The Army points out that flights transiting to, from, and between their proposed landing zones and mountain training areas would occur over various flight paths because the pilots under training would be planning their own flight paths as part of the training exercise. In other words, the paths the helicopters will be flying will be predetermined prior to conducting the flight. Aircraft usually do this by laying out GPS waypoints and flying in straight (or nearly straight) lines between waypoints.

So here is the plan:

1. Establish "large" Low Level Flight Areas (TRAINING AREAS) which are completely contained within BLM property. Allow HAMET helicopters to fly at any desired altitude within these TRAINING AREAS. Ensure that the boundaries of TRAINING AREAS are at least 1000 meters away from all homes. Where there is a livestock

concern on adjacent private property, keep the TRAINING AREA boundary at least 500 meters within BLM boundaries to provide a buffer area. When outside of a TRAINING AREA, the general rule would be that helicopters must stay above 500 feet AGL. Additional flight path and altitude restrictions are discussed below. The TRAINING AREAS would be defined by a BLM maintained HAMET.kmz file posted on the BLM HAMET web site so both the Army and the Public know where low level flights are permitted. While the TRAINING AREAS discussed above are much smaller than the Mountain Training Areas in the Plan of Development, the areas are nonetheless still very large and give Military helicopters plenty of room to train.

2. Ensure all landing zones are more than 1000 meters away from any private residence or occupied building. Note that if a landing zone is close to a BLM boundary, a low level (below 500 feet AGL) approach to that landing zone may be prohibited from the direction of nearby homes. This is because the boundary of the TRAINING AREAS, where low level flight is permitted, may be forced to come close to the landing zone on the side where homes are located. See Landing Zones 407 and 409 and the associated TRAINING AREAS as defined by the HAMET.kmz file.

3. BLM would also establish No Fly Areas. Military helicopters would be expected to not fly over No Fly Areas. BLM could establish other guidelines such as, "Helicopters may fly over No Fly Areas if necessary due to developing circumstances such as an approaching thunderstorm, but should try to do so at an altitude of at least 2000 feet." No Fly Areas could be established around sensitive wildlife areas or known heavily used recreational or camping areas. The no fly areas would be defined by the BLM maintained HAMET.kmz file.

4. Two access corridors (one going and one coming) between Fort Carson and the nearest TRAINING AREAS should be established where HAMET helicopters would be permitted to fly as low as 200 feet while transiting to or from the Post provided they maintained a distance of at least 1000 meters from occupied buildings. The access corridors would be defined by the BLM maintained HAMET.kmz file. Otherwise, transit flight "paths" to and from the Post

would be unrestricted as long as the helicopter flies at or above 1000 feet. Since there could be (and already are) a very large number of transits per day in the vicinity of Canon City, this higher altitude is necessary to minimize complaints.

5. The locations of all houses in the vicinity of the HAMET training areas should be determined and made available in the HAMET.kmz file. When designing a HAMET training flight path, pilots would plot their flight path such that it avoids identified occupied buildings by a distance of at least 1000 meters. The flight path should also include altitude requirements such that any helicopters flying outside of TRAINING AREAS or Access Corridors, and not otherwise transiting to or from the Post, will be at or above 500 feet AGL. Property owners whose homes are not covered by the HAMET.kmz file could request that they be added to the file if BLM agrees they are experiencing frequent HAMET flyovers. The Army's HAMET program would provide to BLM on a daily basis a copy of all HAMET helicopter flight plans as simple KMZ files. BLM should be able to plot the path of all helicopter flights and be able to see where any problems may be developing.

ADDITIONAL DISCUSSION:

I have prepared a sample HAMET.kmz file for your use. This file covers (1) Low Level Flight Areas referred to as TRAINING AREA in green shading, (2) Landing Zones, (3) House locations as small yellow house icons, (4) a sample No Fly Area as red shading, and (5) Access Corridors as purple shading. I have eliminated Landing Zones 408, 410, 616, 701, 702, 703, 704, 705, and 706 and put them in a Rejected Landing Zones folder. Landing zone 706 was included (rejected) because I could not determine an acceptable access path to that landing zone that would not require a very high flight path in order to stay away from houses. I have also included the route of an electrical power distribution line which helicopters should avoid. The proposed TRAINING AREA was designed to keep the low flying helicopters away from this power line for safety reasons. Since 9 landing zones have been eliminated because of close proximity to houses,

I have searched the area for possible replacement landing zones which have been identified with an "H" icon in a KMZ folder labelled Replacement LZs. I would recommend that you allow the Army to check these landing sites and pick 11 (for a total of 45) that they consider acceptable for inclusion in the HAMET program. The replacement landing zones are labelled with their approximate elevation (in feet) with the exception of LZ 409-A which I recommend be used to replace (or move) current proposed LZ 409 to give it better separation from nearby houses. LZs 409 and 409-A are in the same large field.

You will need to generate your own No Fly Areas because I don't know where they should be located. As noted above, I have provided a sample No Fly Area to get you started. If desired, I can generate No Fly Areas for you if you can tell me where they should be. Note that it is fairly easy to adjust AREAS defined by KMZ files. I would assume that BLM may need to adjust the TRAINING AREAS, No Fly Areas, and Access Corridor files periodically based upon changing circumstances. This is a simple process which can be accomplished in a matter of minutes. The attached document named USING THE HAMET KMZ FILE gives instructions covering basic actions needed to maintain the KMZ file.

Included in the HAMET.kmz file is a [HELICOPTER TOUR OF THE TRAINING AREA](#). This tour takes off from the Fort Carson air field, flies across Fort Carson (pink color) until it reaches the northern access corridor (purple), flies along beside the no fly area (red) and finally reaches the nearest low level flight area (green). It then flies over most of the low level flight areas trying to go past all of the (acceptable) original landing zones (green dots) and all of the newly proposed replacement LZs (small red H's). The tour does some "back tracking" to stay in the training areas. Where necessary, the tour flies across private property to reach adjacent training areas. The tour eventually returns to Fort Carson via the southern access corridor. When taking this tour, turn on the Military Reservation shading, the HOUSES, ACCEPTED LZs, REPLACEMENT LZs, TRAINING FLY AREAS, and POWER LINE (blue). To start the tour, double click on HELICOPTER TOUR OF THE TRAINING AREAS. This tour takes 31 minutes but you

can select various levels of fast forward to speed things up. Place the mouse in the lower left of the screen to cause the tour controls to become visible. You can even pause the tour and zoom out to check where you are in the HAMET training area and see what is nearby ... then resume the tour. While taking the tour, note how much land is included in the TRAINING FLY AREAS and how few homes are seen going by. Any house within 1000 meters would be visible. The tour which covers over 300 miles at around 600 mph demonstrates how easy it is to avoid houses if that is your goal.

My overall plan is designed to make things simple for the Army. Once all the training areas, landing zones, and house locations have been determined by BLM, it will be possible to turn off the Government Lands shading to simplify the Google Earth view. The pilot laying out his route will only see (1) areas where he can fly low, (2) areas where he cannot fly, (3) houses he needs to avoid, and (4) the landing zones he is trying to get to.

Note that my proposed plan eliminates the concept of Mountain Training Areas and the concept of low level flight areas (red zones) within 1000 meters of landing zones. In the new plan, the Army has been given the ability to conduct low level flight training over a much larger area at the expense having to expend some effort to stay farther from houses. I'm of the opinion that these additional flight path and flight altitude restrictions will actually improve the training effectiveness and better prepare the pilots for maneuvers in a hostile operating theater. The amount of extra effort required on their part will really be minimal. The pilots would take the information on the KMZ file (using Google Earth or equivalent) and plot their desired waypoint locations and associated flight altitudes. This is pretty much what they were going to do anyway. By following their own flight plan, they will not fly over or even near any houses.

CONCLUSION:

The above plan is a COMPROMISE. The Army will not be happy because they will not be free to ignore all the noise abatement

rules they say they follow everywhere else, and the local residents will not be happy because they will still see and hear a lot of helicopters. On the other hand, public safety will be improved and noise levels experienced by private homeowners will be much lower than would be experienced otherwise.

OTHER RANDOM THOUGHTS:

I note that several local Fire Chiefs have expressed concerns about the possibility of a confusing situation developing should a helicopter mishap occur, possibly resulting in a fire. With up to 170 landings per day in the training areas by "pilots-in-training," the likelihood of an occasional mishap is fairly high. I would recommend that part of the HAMET agreement include the requirement that Fort Carson have two helicopters on standby capable of being equipped for fire fighting and being able to respond to a fire within one hour anywhere in the HAMET training areas. I would also encourage them to practice such operations. Maybe they could water the grass in damaged landing zone areas. Keeping the landing zones damp may provide other benefits.

Another concern is that the medical responses of Flight-for-Life and Memorial Star helicopters may be adversely impacted by unpredictable Military training flights. While the Flight-for-Life and Memorial Star pilots are often ex-military and can take care of themselves, the opportunity exists to provide these two organizations with the approximate flight plans (time and path) of the Military training flights. This could turn out to be important because the Military helicopters may otherwise appear "out of nowhere" when taking off from remote landing zones. Note that in my discussion above, I recommend that BLM be provided on a daily basis with the helicopter flight plans for the day. One would hope that the HAMET Program administrators are asking for and reviewing the flight plans being prepared by their pilots-in-training to avoid unnecessary "interactions" during the flights. After approving those flight plans, they could be sent over to BLM and could also be provided to the Flight-for-Life and Memorial Star organizations each day. No one else would know where the helicopters are going. As far as the HAMET Program is

concerned, the amount of additional effort required would amount to including a few more "copy to" addressees on flight plan emails.

In addition to the HAMET.kmz file discussed above and the Google Earth maintenance instructions, I have also attached a simple draft HAMET approval document for your consideration based on the above discussion.

If you decide to adopt my plan or a variation of it and need help generating or modifying the KMZ files, feel free to ask. As a Retired Federal Government Employee, I work for free.

K. C. Jones

3 attachments



USING THE HAMET KMZ FILE.docx

10K



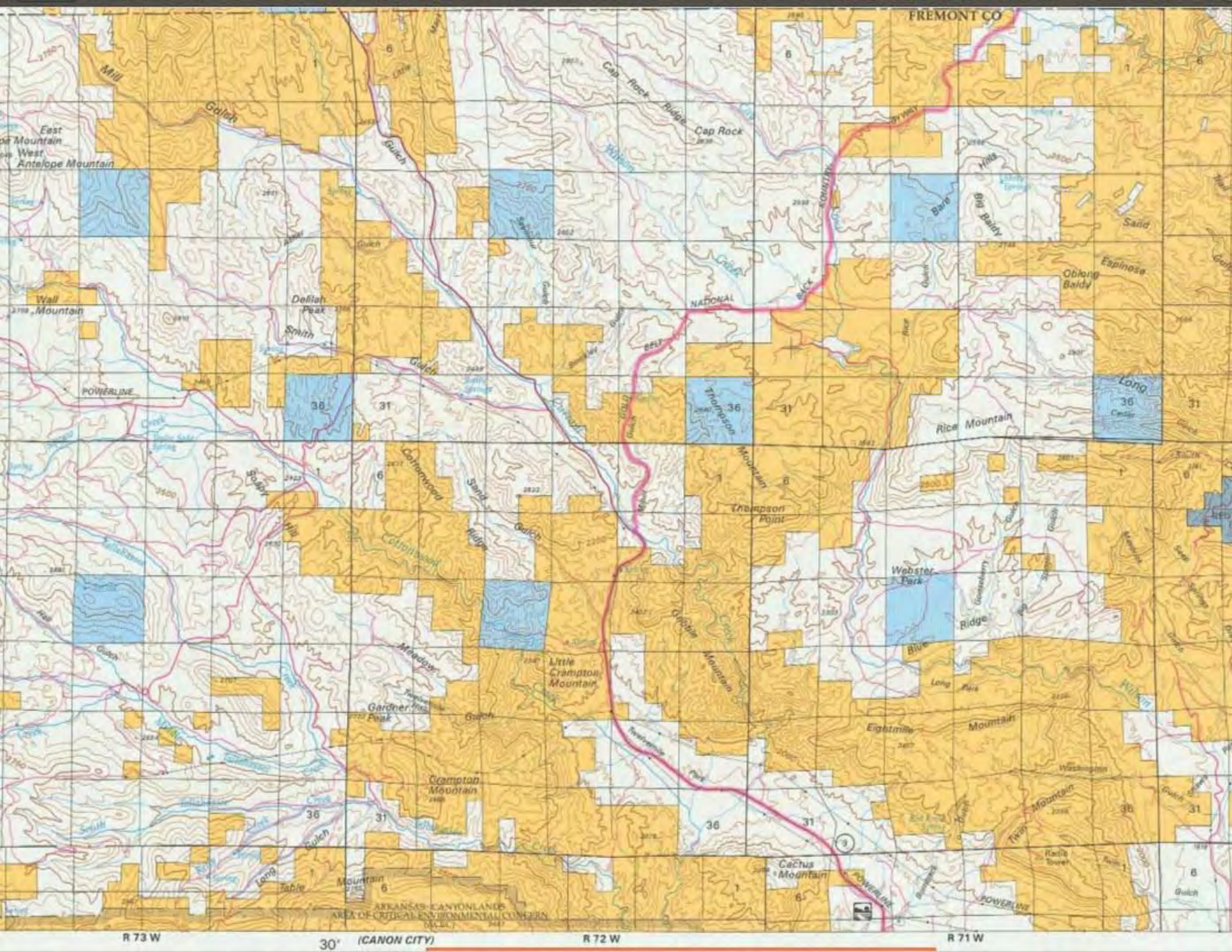
PROPOSED HAMET APPROVAL DOCUMENT.docx

7K



HAMET.kmz

1312K



FREMONT CO

East of Mountain
West of Antelope Mountain

NATIONAL

ARIZONA CANYONLANDS
AREA OF CRITICAL ENVIRONMENTAL CONCERN

R 73 W

30' (CANON CITY)

R 72 W

R 71 W



HAMET - Some Questions

KC Jones <kcj@ccvnet.net>

Fri, Dec 5, 2014 at 8:40 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

1. On the [BLM HAMET Web Site](#) under "Public Meeting Documents" there is the [Fort Carson Presentation](#).

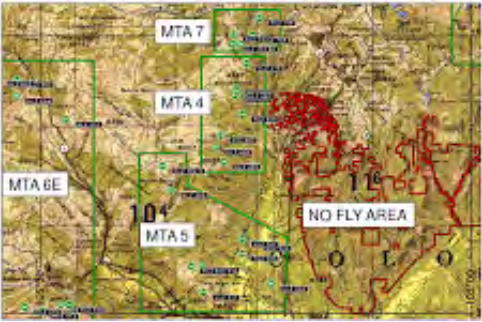
On page 11 of the Presentation is an image showing the eastern group of Mountain Training Areas. That image is the first image attached to this email (which is probably also below).

QUESTIONS: while not shown on this image, Landing Zones 501, 502, 503, and 504 are located in the NO FLY AREA of this image (They would be pretty much under the words "NO FLY AREA.") Was this a mistake by the Army or has the NO FLY AREA been eliminated or modified. If modified, can BLM make available an updated image or KMZ file showing the current NO FLY AREA?

2. The second image attached shows a section of the BLM "Pikes Peak 2010" map. The bottom edge of this map is marked "[ARKANSAS CANYONLANDS - AREA OF CRITICAL ENVIRONMENTAL CONCERN](#)." Is this still an Area of Critical Environmental Concern, and if so, is this area compatible with HAMET Landing Zones? The reason I ask is because Landing Zones 607 through 614 appear to be in this area (see third image attached).

3. Does BLM have maps showing all the BLM restricted areas where HAMET landing zones cannot be located?

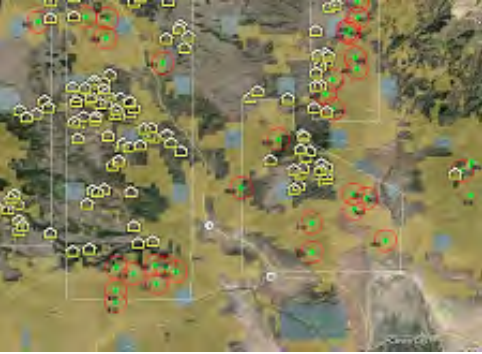
3 attachments



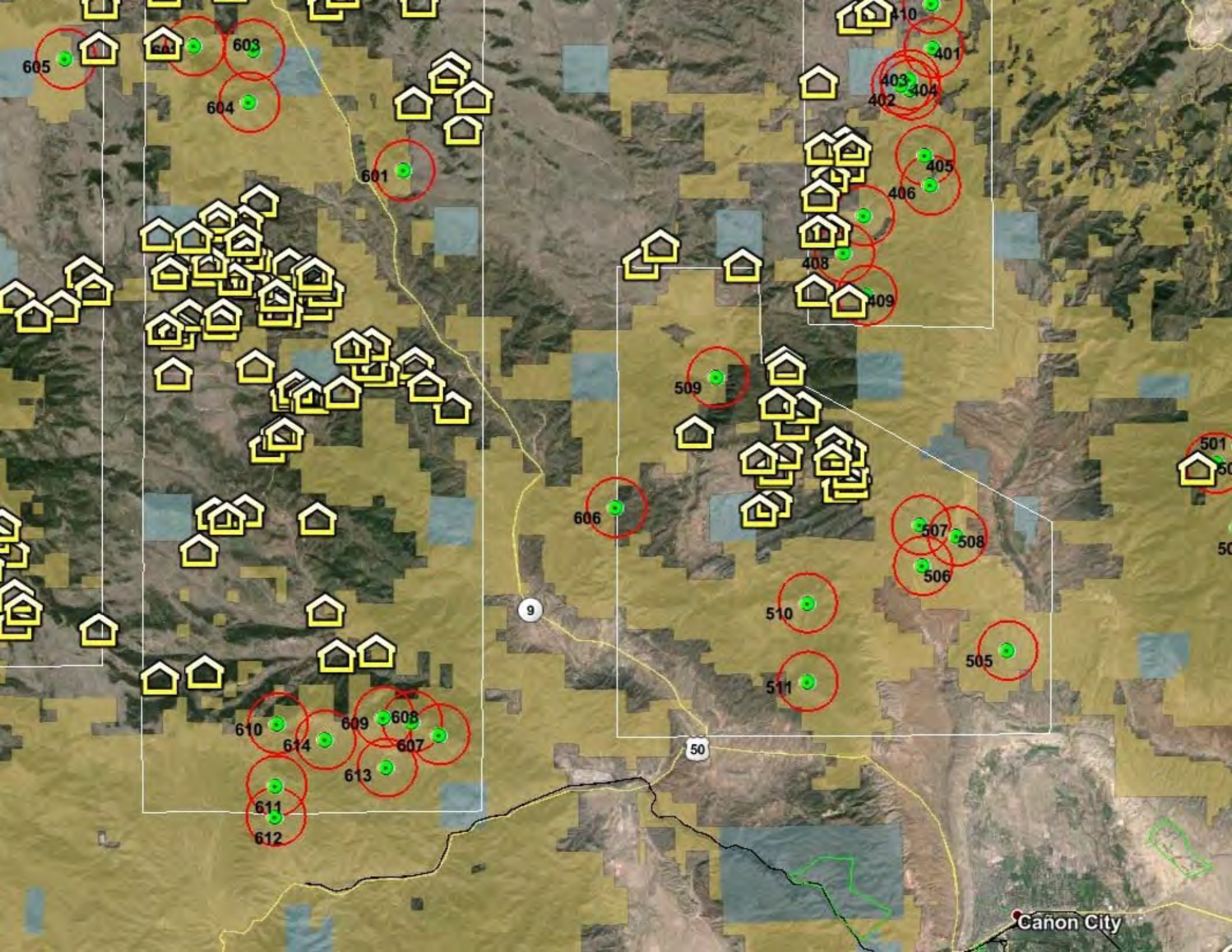
NO FLY ZONE.jpg
416K



PIKES_PEAK_BLM_MAP_2010.jpg
467K



HAMET (South).jpg
316K



605

603

604

601

610

614

609

608

607

613

611

612

410

401

403

404

402

405

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510

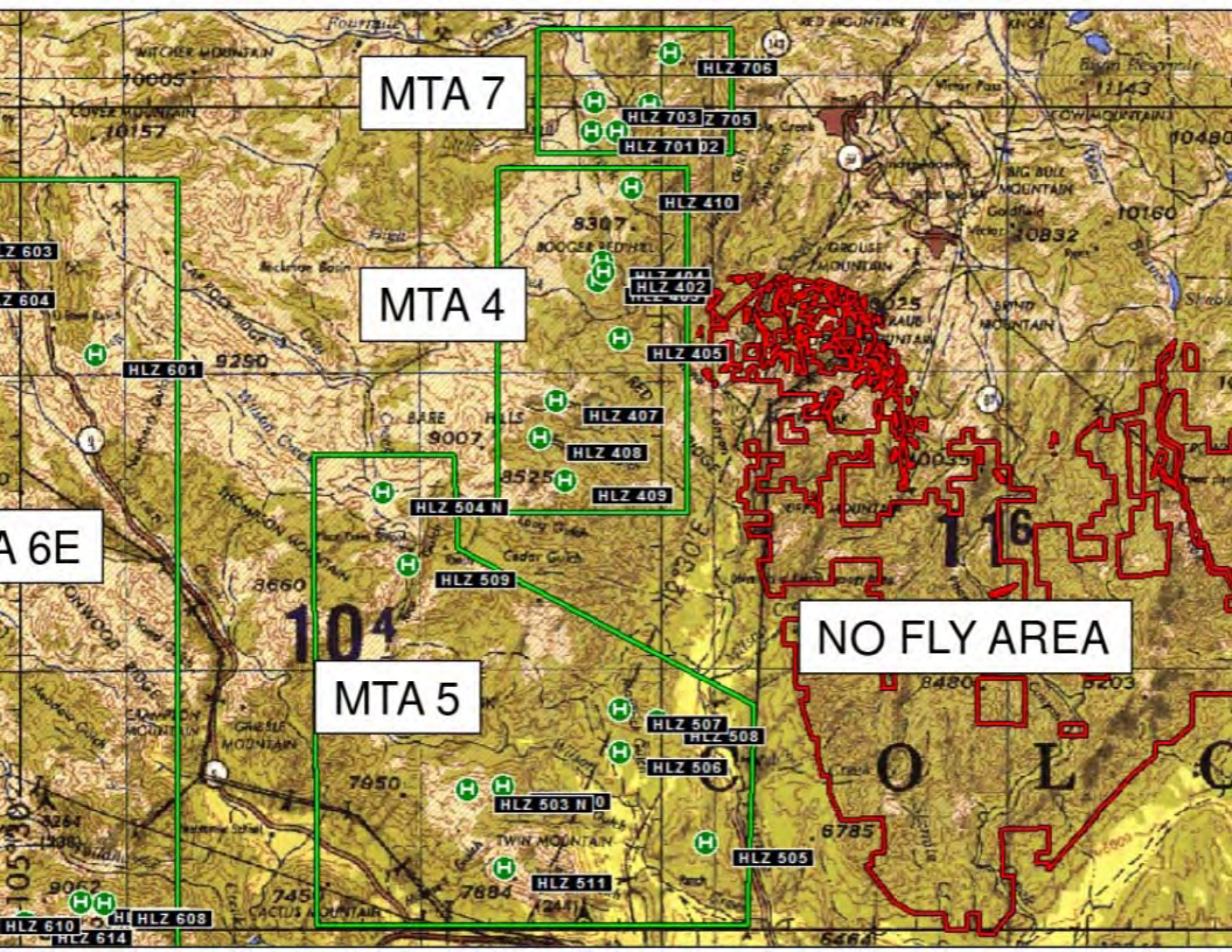
511

505

9

50

Cañon City



MTA 7

MTA 4

MTA 6E

MTA 5

NO FLY AREA



Helpful HAMET Recommendations

KC Jones <kcj@ccvnet.net>

Wed, Dec 17, 2014 at 4:13 PM

To: Keith Berger <kberger@blm.gov>, Nancy Keohane <rgfo_comments@blm.gov>

Keith and Nancy,

For the purposes of this email, define a **Red Zone** as the circle around a Landing Zone with a 1000 meter (0.62 mile) radius in which helicopter training down to zero feet altitude will be permitted.

The following recommendations impact Landing Zones 408, 410, 616, 701 through 705 which have private homes within the proposed Red Zone training areas.

Recommendations:

1. **Redefine the boundaries of Mountain Training Areas (MTA's) such that all MTA's are fully contained on BLM land.** It makes no sense for BLM to reach an agreement with the Army which effectively permits the Army to have an unnecessary direct and significant impact on Private Lands by flying over private property at below 500 feet.
2. **Relocated Landing Zones (LZ's) such that the associated Red Zones do not extend outside BLM land.** It makes no sense for BLM to allow the Army to fly at zero feet altitude over private homes without the permission of the private landowner.
3. **Ask the Army to adopt the same noise control flight rules over the high country training areas that they use elsewhere.** Namely, while not over BLM land, fly above 500 feet. while over BLM land but while also in the vicinity of private homes,

Livestock, and roadways with moving vehicular traffic, maintain a stand-off distance of 0.43 miles. Applying this Fly-Neighborly policy would definitely eliminate Landing zones 410 and 701-705 (see attached picture). Landing zones 408 and 616 have a few houses nearby but the Army may be able to avoid complaints by trying to avoid those houses and livestock. See second and third attached pictures.

4. BLM could solve most HAMET problems by simply allowing the Army to clear several 300' x 200' areas deep in the forest to generate problem free landing zones.

Fort Carson says their noise management practices include (1) participating on planning commission and stakeholder committees, (2) using their Fly-Neighborly procedures, (3) using their Complaint Process Standing Operating Procedure, and (4) the Army Compatible Use Buffer program. If they would do these things with the HAMET program, they would meet much less resistance.

Sincerely,

KC Jones

3 attachments



408.jpg
380K



616.jpg
349K



410 and 701-706.jpg
417K



HAMET Comments following Meeting

KC Jones <kcj@ccvnet.net>

Tue, Dec 9, 2014 at 4:10 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

9 December 2014

Nancy,

Based on the 4 December 2014 meeting, and new information, I have the following comments:

Invasion of a Private Property Owner's Airspace -
(Disclaimer: I'm not a lawyer) It seemed pretty obvious to me that there must be some limit on how often and how low a helicopter could fly over private property, so I did some research. The Courts have ruled that frequent and low "Government" flights are a "taking" of a property owner's "property interest" which requires "compensation." It is also possible that such flights could be an invasion of privacy and/or possibly trespassing. Laws are currently being drafted to criminalize the flying of a UAV Drone over the property of another person. UAV flights are restricted to 400 feet or below. For an aircraft (not a UAV) "Low" is defined as "below the approximate FAA minimum safe altitude for commercial air carrier flights" which is currently 500 feet over "populated" areas. All flights above the Government (FAA) specified minimum safe altitude are currently considered to be acceptable, no matter how annoying or for what purpose, since Congress has placed into the public domain, as a public highway, the navigable airspace above the minimum safe altitude for air carriers. The airspace from the ground to the approximate 500 foot level is considered to be owned by, or at least a "property interest of," the owner of the property below. While helicopters are permitted by the FAA to fly below 500 feet, it appears this exception does not change the above legal argument because they would not be acting as an air carrier using the public highway in the sky. It also appears that even law enforcement can get into difficulties if they fly below 400 to 500 feet and "see something" they could not see otherwise (invasion

of privacy, warrant-less search, etc.).

BLM Legal Involvement - If the BLM takes an action which the Army interprets as justification and permission to make frequent low level flights over private property, is the BLM culpable?

Mountain Training Areas - The currently proposed Mountain Training Areas (MTA's) are 30 to 70 percent non-BLM lands which would appear to be a BLM legal concern if the proposed MTA's are approved by the BLM. The HAMET proposal would allow training helicopters to fly as low as 80 feet anywhere within an MTA, including over private property. Shouldn't BLM approved Mountain Training Areas be confined to BLM property such that any HAMET flights below 500 feet occur only over BLM controlled lands?

Contingency Clause - If the BLM approves some kind of HAMET plan, the BLM should include in that agreement a contingency clause stating that flight intensity (number of flights) will be (temporarily) decreased or terminated, if training helicopters are shown to be repeatedly in non-compliance with the agreed upon flight areas and altitude restrictions? We have already heard during the meeting from the Army and seen during the Casual Use period that helicopter pilots can be hard to control and that they play loose with the rules, landing on private property and landing on BLM land where they were not authorized to land. The BLM needs some kind of enforcement mechanism to ensure that all Military pilots take HAMET commitments seriously. A trainee would not want to be the pilot who caused the cancellation of training for his fellow pilots. The Fort Carson personnel running the HAMET program could also use this disciplinary requirement to their advantage.

Noise Ordinances - Can counties pass noise ordinances which specifically restrict helicopter minimum altitudes to 500 feet or more over private property and residential zoned areas unless conducting medical, fire fighting, or law enforcement tasks? Many cities and local governments have passed noise ordinances. If the BLM were to approve the current HAMET proposal, noise ordinances passed by the impacted counties could send HAMET back to the drawing board. BLM should come up with a HAMET plan that will not adversely impact County administered properties.

Red Zones around LZ's - Shouldn't BLM approved landing

zones, including the 1000 meter radius circle around them, be totally enclosed within BLM property since HAMET Military training flights down to ground level could occur anywhere within the 1000 meter radius? Many of these circular areas around landing zones, where more hazardous low level flight training will be conducted, currently include private property and residential areas including approximately 50 homes. Does anyone think that having private homes within a military high intensity training area is a smart move?

Flight Intensity - The HAMET proposal is cleverly written, and the Army presentations are carefully crafted, to give the impression that the number of flights will be minimal. For example, the Army always tells you FIRST that there will be around 16.25 "Fort Carson" flights per LZ per year. This is an insignificant and irrelevant number designed to give the wrong impression. In the HAMET proposal, the "real" number is buried in a tangle of computations, and the Army doesn't mention the "real" number in Public presentations. If you put all the facts together, you would conclude that the HAMET program will allow as many as 1460 landings and 1460 take-offs on each of the 43 landing zones per year with 30 minutes on the ground between a landing and take-off. If this "expanding" program were running at maximum capacity, this would mean that over 60,000 landings and take-offs per year would occur in the HAMET training areas. BLM should clarify this during any future public meetings if the Army does not.

Ensuring Safety of People and Animals - There are few things more dangerous than spinning helicopter rotor blades, and because of "tilt," the tips of the main rotor blades of a moving, very low flying, helicopter can come very close to the ground. Shouldn't the Army take more positive action to ensure any affected areas are clear of people, livestock and wildlife rather than simply relying on their apparent current plan to just check the area from the air prior to conducting Nap-of-the-Earth low level training?

Landing Zones Not in Correct MTA: Several of the proposed Landing Zones are not properly located within their associated Mountain Training Areas. For example, LZ 606 should be in MTA 6E or 6W but it is in, or almost in, MTA 5. LZ's 501 through 504 should be in MTA 5, but instead they are in the BLM No-Fly-Area (for the Mexican Spotted

Owl?) several miles to the east. The No-Fly-Area is shown in the Army's Power Point presentation document available on the BLM web site. These errant LZ locations do not appear to be the result of "typographical errors" since the errant locations do identify "good" landing zones. I worry that this apparent sloppiness may indicate that the Army views their own HAMET proposal as nothing more than suggested guidelines.

Area of Critical Environmental Concern - Landing Zones 607 through 614 appear to be located in an area marked "Arkansas Canyonlands - Area of Critical Environmental Concern" on the BLM 100K Surface Ownership Maps labelled Pikes Peak (2010) and Canyon City (2009). Is this an acceptable location for HAMET landing zones?

Noise - First, I find it interesting that the Fort Carson noise study indicates that 100% of non-military people will rate a 200-foot overflight by most of the Army's helicopter types to be "Very Annoying" ... the worst rating. Noise studies and restrictions are typically based on civilian annoyance studies.

Excerpts from the noise study which provide Fort Carson's self-imposed flight restrictions are included below at the end of this email and can be summarized as (1) helicopters will maintain a minimum altitude of 500 feet while off base (except while in low level training route), (2) that while flying through mountain passes, helicopters will stay above 1000 feet and maintain a standoff distance of 0.25 miles (from houses, etc.), and (3) while in a low level flight training route will avoid all houses, people, livestock, and moving vehicles by 0.43 miles (692 meters).

If the intent of these existing flight restrictions were applied to HAMET, and I can think of no reason why they shouldn't, we would need to eliminate Landing Zones 408, 410, 701, 702, 703, 704, 705, and 616 since they represent a low level training areas too close to houses regardless of from which direction the helicopters approached. Other LZ's would probably need to be eliminated if we took the 1000 meter red zones into account.

Scoping Prior to Design - It appears that the Army designed the HAMET proposal by first identifying good landing zones (level clearings), and then by drawing large boxes (Mountain Training Areas) around groups of landing

zones while giving little or no thought to who or what was inside those training areas, including who owned the enclosed land. As noted above, Mountain Training Areas are significant because low level flights below 500 feet and as low as 80 feet are permitted anywhere within an MTA. The Army proposal says that they prefer to avoid "National Register of Historic Places, sensitive plant and wildlife habitat, high-use recreation areas, and other sensitive or protected resources ...". However, their proposal says nothing about how or if they did any research to identify areas they should avoid. It took me around two hours to locate 90% of the homes in the proposed Mountain Training Areas and probably 100% of the homes inside the "red zones." Maps showing extreme fire danger and sensitive biodiversity areas are available from the Coalition for the Upper South Platte. I'm sure there will be many other areas of concern identified by comments you receive from the public that should also be (and should have been) factored into the overall HAMET design.

RECOMMENDATION: Many problems have been identified with the current HAMET proposal, most of which can be resolved. Based on my comments alone, it would appear that the Army proposal was not well thought out and is somewhat sloppy. It looks more like a wish list, "If I could have anything I wanted, what would I ask for?" Rather than trying to make the extensive changes required to "fix" the proposal, the best approach would be to (1) have the Army withdraw their proposal, (2) give them more complete design guidelines and restrictions, and (3) have them redesign and resubmit the proposal. I'm getting the impression that the approach used was "Give us your recommendation and then we will tell you what you can't do."

I'm sure this was probably consistent with bureaucratic requirements, but there are better approaches.

Whatever approach you decide on, I would recommend that you give the Army the following design guidelines:

1. Require that MTA's, LZ's, and the "Red Zone" areas around LZ's all be fully contained within BLM land.
2. Require that the Army follow their existing flight level and avoidance requirements when flying to, from, and between MTA's when not over BLM land. (More on this below).

3. Require that Red Zones be located far enough from BLM boundaries to allow aircraft to meet the Fort Carson 500 foot minimum flight level requirement while not over BLM land, as well as their low level standoff requirements while over BLM land. This would also provide a buffer between the Red Zones and adjacent private property.

4. The proposal should explain how the Army will confirm that any BLM "Red Zone" area about to be used for Nap-of-the-Earth low level flight training is clear of people, livestock, and large wildlife ... and stays clear ... before the trainees arrive.

5. Require the Army to provide confirmation that they have considered, studied, and taken steps to avoid impacting, while flying below 500 feet, any residential areas, ranching areas likely to have livestock, sensitive plant and wildlife habitat, high-use recreational areas, moving vehicles, dangerous wildfire areas, conservation easements, and other sensitive or protected resources including areas or artefacts having special meaning to local Native Americans that might be damaged by an accidental fire incident.

6. Establish a committee including several local residents, County administrators, knowledgeable representatives from organizations like the Coalition of the Upper South Platte, the Pikes Peak Historical Society, and the Division of wildlife to assist in the development and review of the HAMET proposal.

Those are my comments for now.

KC

Please confirm receipt of this email ... and don't forget to look at the Fort Carson noise study excerpts below

Quotes from the Army noise study:

"... all rotary-wing aircraft will maintain a minimum of 1,000 feet (304.8 m) Above Ground Level (AGL), and 0.25 mile (0.4 km) standoff outside Fort Carson while flying through the mountain passes until clear of inhabited areas (weather permitting), unless they are operating in a designated low-level or Nap-of-the-Earth (NOE) training route."

"Aircraft must maintain a minimum altitude of 500 feet AGL off-post unless they are flying per an exception listed in Fort Carson Regulation 95-1"

"The flights between Fort Carson and Piñon Canyon Maneuver Site (PCMS) were addressed in a 2008 Noise Consultation (U.S. Army 2008). The key points are summarized below:

"There is one low-level flight training route, Route Hawk, between Fort Carson and PCMS. While utilizing Route Hawk, aircraft avoid all houses, buildings, people, livestock, and moving vehicles by a minimum slant range of 1/2 nautical miles (0.43 statute miles). While in Route Hawk, maintaining a 1/2 nautical mile slant distance from buildings, people, livestock, and moving vehicles, the annoyance risk should remain low.

"Helicopters flying from Fort Carson to PCMS, outside of Route Hawk, should maintain a slant distance 1,760 feet (0.29 nautical miles / 0.3 statute miles) from buildings, people, livestock, and moving vehicles to reduce the potential for annoyance."

(I assume that the "reduced" slant distance (0.3 miles) outside of Route Hawk is permissible because the helicopter paths will be random and not concentrated along one frequently used route)



Re: HAMET Program - Comments On

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 4:40 PM

To: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

Thanks ... trust me ... I'm not upset about anything.

KC

--- blm_co_rg_comments@blm.gov wrote:

From: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

To: KC Jones <kcj@ccvnet.net>

Subject: Re: HAMET Program - Comments On

Date: Tue, 25 Nov 2014 16:38:39 -0700

Dear Mr. Jones,

Thanks again, sorry if I came off wrong its has been a long day at the office. I am very interested in what you sent and do appreciate all the work you have put into it. I'm pretty sure I sent this announcement to you already but to be on the safe side... here it is again. I hope we will be able to meet on Dec 4 at the Cripple Creek meeting.

PUBLIC MEETING YOU ARE INVITED

What: Fort Carson has submitted an application to use BLM-managed public lands in your area for helicopter training.

The BLM is analyzing this application through an open public process, and would like your help to identify what issues and concerns should be addressed in the Environmental Assessment before the BLM begins drafting the document.

When: December 4, 2014, 4:30 pm – 7:00 pm

Where: Cripple Creek Heritage and Information Center

9283 State Highway 67

Cripple Creek, CO 80813

On Tue, Nov 25, 2014 at 4:32 PM, KC Jones <kcj@ccvnet.net> wrote:
Nancy,

I'm not trying to overload you. The first email without the attachment was resent as "I'll Try Again." It is my primary comment letter ... very long but contains a lot of good information.

Please take a serious look at "HAMET - Simplified." It is very short and may be an answer to a lot of your problems.

KC

--- blm_co_rg_comments@blm.gov wrote:

From: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>
To: KC Jones <kcj@ccvnet.net>
CC: Nancy Keohane <rgfo_comments@blm.gov>
Subject: Re: HAMET Program - Comments On
Date: Tue, 25 Nov 2014 16:24:08 -0700

Dear Mr. Jones,

Thank you for the email. I see I have a few more to read. I wanted to make sure that you knew I didn't receive an attachment on this one.

Thanks, Nancy

On Tue, Nov 25, 2014 at 12:53 PM, KC Jones <kcj@ccvnet.net> wrote:

Nancy,

Please find attached my comment letter on the HAMET Program.

I will be sending some additional supporting emails shortly.

Kenneth C Jones

Please acknowledge receipt of this email.



Fwd: HAMET and Housing Density

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 12:58 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

I have tried to find all the houses in each of the proposed Mountain Training Areas. I have also added the 1000 meter circles around each Landing Zone. These are the areas that will be impacted the most by the helicopters. Look for houses that are in one or more red circles as you look at these pictures.

Counting all of these houses in all the large Mountain Training Areas was not easy and I'm sure I missed a few, or maybe I counted a barn as a house. However, concerning the red circles, I searched the circles several times trying to be sure I had not missed any houses. Also, in Mountain Training Area 4, there are many, many small white objects which may be small trailers. I didn't count all of them because I could not confirm that they were a likely home for somebody (e.g., no driveway, no cars, no propane tank, etc.) A few of them may be some kind of residence.

If you try to count houses yourself using these images, you may think you have found a small discrepancy. What happens is that if you go to Google Earth and zoom in really close, some of the house icons (the yellow house shapes) move a little bit and the actual house may be inside the circle while the icon appears to be just outside the circle. I counted by zooming in on each house and determining on which side of the red circle it was located.

The first 5 pictures are Google Earth views from an altitude of 30 miles. All the pictures are made the same way in this set so that the apparent housing densities are comparable. The order of the pictures is MTA 6W, MTA 6E, MTA 5, MTA 4, and finally MTA 7.

MTA 7 is so congested that it is hard to see how bad things are, so the last picture is MTA 7 again but zoomed in to 10 miles. This spreads things out so you can see better. In this picture it is important to realize that half of the houses in and around Lakemoor west subdivision are inside a red circle, in some cases some houses are inside 2 or 3 red circles.

Now go back and look at all the other MTA's and note how many houses are inside a red circle.

KC Jones

6 attachments



30 MILE VIEW OF 6W .jpg
183K



30 MILE VIEW OF 6E .jpg
174K



30 MILE VIEW OF 5 .jpg
122K



30 MILE VIEW OF 4 .jpg
53K



30 MILE VIEW OF 7 .jpg
44K



10 MILE VIEW OF 7 .jpg
200K



HAMET - Mountain Training Areas

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 12:55 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

The Army is proposing the concept of Mountain Training Areas.

In their planning document, they have a fuzzy topographical map in which they indicate where they want those areas to be.

while they have told us in great detail exactly where the individual landing zones are located, we only have this fuzzy

map for the locations of MTA's. MTA's are important because

the Army implies that they will be flying lower than the usual 500 foot level while they are inside an MTA.

To better understand where the MTA's really are, I took the

fuzzy topo map and studied it in detail trying to determine

the exact corners of each area. I then put the MTA's on the Google Earth map.

When you step back and think about it, the BLM really cannot

say yes or no to the concept of a Mountain Training Area and what the Army can do inside one unless the BLM owns all

the land inside the MTA. I think the Army knows this.

They

are simply trying to make us think that there is something special about these areas and that the BLM has agreed with them. They will then use this "tacit approval" as justification

for flying at lower levels over private property, State property,

and Forest Service property. They really don't need BLM approval

because the FAA lets helicopters fly anywhere they want as long

as they don't hurt anybody. However, the Army gets lots of complaints all around the country about the helicopter noise they make. These Mountain Training Areas will give them a little more of an excuse for flying low. On the other hand, the BLM could say, "If you are going to use our property for landing zones, we demand that you fly at 500 feet or higher until you get to BLM property. Only on our BLM property are HAMET helicopters allowed to fly below 500 feet if you want to use BLM land." This is how the BLM could support the Army while also helping to protect the public from abuse by the helicopters.

When I prepared this figure is when I noticed that many if not most of the LZs on the topo map are wrong or have moved. LZ's 501, 502, 503, 504 and 606 are not where they should be unless something happened to my landing zone KML file. LZ 606 is not in MTA 6E or 6W. It is in, or almost in, MTA 5. LZ's 501, 502, 503, and 504 are not in MTA 5, but instead they appear to be in the No Fly Area established for the Mexican Spotted Owl.

See the red area in the second figure. This figure is in the Army presentation document on the BLM web site.

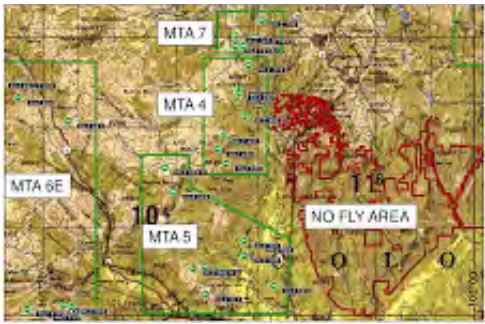
Like I have said before, the Army should really start over. Their story is getting jumbled because of all the "adjustment" they have been making.

KC Jones

2 attachments



Mountain Training Areas.jpg
353K



No Fly Area .jpg
569K



HAMET - Counting of Houses

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 12:59 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Here is my raw tally of houses inside the circles around each landing zone. Note that the four houses near landing zone 4 in MTA 4 are all houses in Lakemoor West Subdivision. The important point about the circles is that the Army plan would allow their helicopters to fly as low as they want inside these circles.

KC Jones

=====

MTA 4	LZ	Number of Houses
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	2
	9	0

LAKEMOOR

10 4 HOUSES

		Number of Houses
MTA 5	LZ	
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	0
	9	0
	10	0
11	0	

		Number of Houses
MTA 6E	LZ	
	1	0
	2	0
	3	0
	4	0
	6	0
	7	0
	8	0
	9	0

10	0
11	0
12	0
13	0
14	0

		Number of Houses
MTA 6W	LZ	
	605	0
	615	0
	616	1

		Number of Houses
MTA 7	LZ	
	1	3
	2	13
	3	9
	4	15
	5	14
	6	0



Pleased Confirm

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 3:22 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Please confirm that you received my emails sent today titled:

HAMET - I'll try again
HAMET - Simplified
HAMET - Counting of Houses
HAMET and Housing Density
HAMET - Mountain Training Areas

If necessary, I can easily retransmit.

Thanks,

KC Jones



HAMET KMZ Files for Your Use

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 3:42 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

I don't promise I found every house, especially in areas outside the 1000 meter rings.

MTA boundaries and corners were determined using the Army Planning Document low resolution Topo map figure.


If these files don't work, let me know and I will try again.

KC Jones

3 attachments

 LZ RINGS.kmz
36K

 HAMET MTA.kmz
3K

 HAMET HOUSES.kmz
17K



Fwd: HAMET and Housing Density

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 12:58 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

I have tried to find all the houses in each of the proposed Mountain Training Areas. I have also added the 1000 meter circles around each Landing Zone. These are the areas that will be impacted the most by the helicopters. Look for houses that are in one or more red circles as you look at these pictures.

Counting all of these houses in all the large Mountain Training Areas was not easy and I'm sure I missed a few, or maybe I counted a barn as a house. However, concerning the red circles, I searched the circles several times trying to be sure I had not missed any houses. Also, in Mountain Training Area 4, there are many, many small white objects which may be small trailers. I didn't count all of them because I could not confirm that they were a likely home for somebody (e.g., no driveway, no cars, no propane tank, etc.) A few of them may be some kind of residence.

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KC Jones

6 attachments



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183K



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174K



30 MILE VIEW OF 5 .jpg
122K



30 MILE VIEW OF 4 .jpg
53K



30 MILE VIEW OF 7 .jpg
44K



10 MILE VIEW OF 7 .jpg
200K

November 25, 2014

Nancy Keohane, NEPA Specialist, BLM

SUBJ: BLM Evaluation of Fort Carson HAMET Program; Comments on

Dear Nancy,

1. INTRODUCTION: I served 32 years either in the Navy or working for the Navy. While serving and tagging along behind various 4-star Admirals, I have flown on and off ships, both large and small, by helicopter while bobbing at sea. I have landed by helicopter at the Pentagon. I fully understand the critical need for the HAMET helicopter training program. However, I strongly believe that HAMET Mountain Training Area (MTA) 7 and probably Landing Zone 410 of MTA 4 are a serious mistake and should be eliminated from the program for the following reasons:

2. HAMET AND THE SUBDIVISION: The Lakemoor West Subdivision includes more than 70 properties and over 40 homes. This subdivision, which is zoned as residential by Teller County, is contained within and surrounded by proposed Mountain Training Area 7 and Landing Zone 410 immediately to the south. All but a handful of properties in the subdivision are within 1000 meters of one or more of landing zones 701, 702, 703, 704, 705, and 410. This is important because low altitude "contour" and "Nap-of-the-Earth" helicopter training will be conducted within a 1000 meter radius around the landing zones per the proposed plan. This means that we can expect helicopters to be operating at very low altitudes and in very close proximity to the multitude of homes throughout the subdivision.

If we take the 1000 meter circles around every HAMET landing zone and determine the number of houses inside each circle, we get the following results:

For the 37 landing zones not impacting Lakemoor West and neighboring subdivisions, we find only **3 houses** within all of the 1000 meter circles for this large collection of landing zones contained in MTA 4, MTA 5, MTA 6E, MTA 6W, and MTA 7.

For the remaining **6 landing zones** (listed below) which are adjacent to Lakemoor West Subdivision, we get the following results for the number of houses inside the 1000 meter circles for landing zones 701-705 and 410 when considered individually:

701	3 houses
702	13 houses
703	9 houses
704	15 houses
705	14 houses
410	4 houses

A few houses are double or triple counted because they are inside 2 or 3 of the 1000 meter circles ... an especially bad situation for those houses. One of our fears is that home owners in close proximity to landing zones may lose their home insurance and possibly their

mortgage and then their homes. While the above analysis says that landing zones 701-705 and 410 are very objectionable, it also points out that the other 37 landing zones are reasonable from a "distance from public" standpoint.

3. **HAMET AND THE FAA:** Aircraft are required to maintain a "minimum safe altitude" of 500 feet while flying over "populated" areas. The FAA allows helicopters to go below 500 feet if they can do so safely. However, logic would dictate that pilots **in training** flying under **unfamiliar high altitude conditions** and at **more dangerous low altitudes** may not be able to do so with an acceptable level of safety when operating for **extended periods over residential subdivisions**. HAMET is being implemented because of the large number of high altitude "mishaps" that have occurred while crews were deployed. If their pilots are going to have high altitude mishaps, the Army clearly wants those mishaps to occur here rather than in Afghanistan. As a result, if mishaps or mechanical problems occur within Mountain Training Area 7, there is a good chance that some of the helicopters will end up in the Lakemoor West Subdivision.

4. **NUMBER OF FLIGHTS:** The HAMET Program Document anticipates "up to" around 1460 combined "tenant" and "non-tenant" flights per landing zone per year. The document also notes that a typical flight includes a landing, 30 minutes on the ground, and a take off. As a result, the neighbors near a landing zone will experience two separate "noise events" per flight. Therefore, the Lakemoor West Subdivision, in very close proximity to six landing zones, can expect up to 17,000 take-off or landing events per year, or around 50 each day or night. Each such event will often be accompanied by an additional low level transit of the subdivision.

5. **NOISE LEVELS AND REQUIREMENTS:** The HAMET Program Document states that an AH-64 helicopter at a distance of 200 feet produces a noise level of 92 dB. Noise levels increase 6 dB each time the distance is cut in half. Therefore, at 100 feet the level would be 98 dB, at 50 feet the level would be 104 dB, and at 25 feet the level would be 110 dB. A noise level of 105 dB can cause some hearing loss after less than one minute of accumulated exposure. Also, the daily "average" noise limit for residential areas is 65 dB when stated in terms of A-weighted day-night average sound level (ADNL). The Fort Carson Noise Study for the Base points out that a single flyover by an AH-64 helicopter at 100 feet produces an ADNL of only 51 dB for the day. However, 8 flights at 100 feet during a day produces an ADNL of 60 dB. Because noise levels at night are more objectionable, the ADNL calculation adds an additional 10 dB penalty. Flights below 100 feet would further increase the ADNL level. It is fairly clear that the 65 dB residential limit could easily be exceeded in the Lakemoor West Subdivision.

6. **FIRE, BIODIVERSITY, RECREATION:** According to studies by The Coalition of the Upper South Platte (CUSP), Lakemoor West is in a wildfire "priority fuel mitigation area." This means that any fires that occur within or adjacent to the subdivision are likely to be hard to control. As a recent volunteer fire fighter with the local 4-Mile Fire Department, I can confirm that fighting fires in this area is not fun. CUSP has also determined that Lakemoor West is in or near priority biodiversity areas as identified by the Colorado Natural Heritage Program. In addition, being in a populated area of the County, the BLM parcels containing Landing Zones 701, 702, and 703 are often used for hiking, horseback riding, camping, partying, target shooting, and hunting. This area is essentially our neighborhood park. The

HAMET Program document states that Fort Carson prefers to avoid “sensitive plant and wildlife habitat, high-use recreational areas, and other sensitive or protected resources.” If this is true, how did they pick Mountain Training Area 7?

7. LEGAL AND OTHER ISSUES: The BLM has the legal authority and the responsibility to manage the lands under its control for the good of the public and the Country in general. With respect to the HAMET helicopter training program, the Army has requested several things from the BLM:

a. The Army has requested the BLM to allow them establish 43 helicopter landing zones on BLM lands to be used by the Army for high altitude training of military helicopter pilots.

b. The Army has requested the BLM to allow military helicopters to fly between groups of landing zones at altitudes as low as 200 feet, often over non-BLM land. The Army really does not need BLM approval to do this. On the other hand, the BLM has the right to tell the Army they cannot establish landing zones on BLM property, so the BLM has the power to influence Army behavior in matters such as flight altitudes in, around, to, and from these BLM lands.

c. The Army has requested the BLM to allow military helicopters, piloted by trainees, to fly at very low altitudes when within 1000 meters of any of the landing zones. While I understand that these flights are necessary, such helicopter maneuvers, even by experienced and fully qualified pilots, are widely recognized as presenting increased risk to the crew as well as any people or property on the ground.

Mountain Training Areas: The BLM has the authority to grant permission for the Army to use “BLM lands” in the manner outlined above. However, the Army has also proposed the establishment of Mountain Training Areas which would enclose very large areas and contain groups of landing zones. The currently proposed Mountain Training Areas include and impact not only BLM lands, but also private lands and lands owned and administered by the State of Colorado and the Forest Service. The “share” of BLM administered lands within the various proposed Mountain Training Areas ranges from around 30% up to around 70%. The remainder belongs to somebody else. The BLM is limited in what it can “authorize” with respect to Mountain Training Areas outside of BLM boundaries unless the BLM is imposing “limits” on Army activities on those non-BLM lands in exchange for giving the Army the right to use BLM property for landing zones.

The BLM will need to take steps to protect the public in and around landing zones from multiple daily helicopter landings and unpredictable low altitude helicopter approaches and departures in all directions from each landing zone. Per the current Army proposal, helicopters may approach and depart landing zones while flying very near ground level, day or night, within 1000 meters (0.62 miles) of a landing zone. It would appear that, for liability reasons, the BLM will have no choice but to make these large areas (1.24 mile circles around the each landing zone) off limits to the public most or all of the time if there is even a small likelihood the public or grazing animals may be present. I personally believe the only way to safely do this would be to enclose the area within a security fence unless the landing zones are in very remote locations. Otherwise, BLM will effectively be allowing

the public to “go out and play on the runway.”

A large number of currently proposed landing zones are at or near the perimeter of a BLM parcel. As such, BLM approval of any landing zone within 1000 meters of a parcel boundary would in effect have a direct and significant impact on the safety, hearing, and health of adjacent property owners within the 1000 meter radius but on non-BLM land, unless the Army is required to keep all extremely low elevation training flights entirely over BLM lands where the BLM can take steps to ensure the health (hearing) and safety of the public.

If the BLM desires to be a good neighbor with the property owners living or working on lands adjacent to BLM properties that are impacted by HAMET, the BLM should use its approval authority to require the HAMET helicopters to stay above 500 feet unless they are over BLM property. FAA rules would allow helicopter flights at lower altitudes, but BLM has the necessary influence to provide some relief to the surrounding public in exchange for granting the Army permission to use BLM property for landing zones. There is plenty of BLM property to give the Army room to practice low level flying below 500 feet. The BLM should retain the right to withdraw approval of BLM landing zones if the Army should ignore agreed upon flight altitude limits.

Based on the above, it would make a lot more sense to establish Mountain Training Areas that are confined to BLM property. The Army would be required to approach and depart MTA's at 500 feet or above. Flights down to 200 feet would be allowed within the MTA over BLM property, and flights down to zero feet would be allowed within 1000 meters of landing zones which would be located at least 1000 meters from all BLM property lines. If necessary, the BLM should allow the Army, at their own expense, to clear small areas large enough for additional landing zones if not enough “natural” landing zones can be found in acceptable areas.

BLM should also consider authorizing the Army to build a minimal “restricted” road system, at Army expense, to reach remote landing zones deep in BLM property and well away from most recreational users and grazing cattle.

BLM should permit the Army to establish a small heliport and refueling facility at a single safe location in the center of the overall training area near a major road such as Highway 9 from Canon City. This will minimize the need for flights between Fort Carson and the training areas while also increasing the amount of flight time for training. This will allow a corresponding reduction in the number of landing zones needed.

Kenneth C. Jones



HAMET - Simplified

KC Jones <kcj@ccvnet.net>

Tue, Nov 25, 2014 at 1:07 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Nancy,

Attached please find my simplified HAMET Plan.

As I read the Army planning document, I get the feeling I am being overwhelmed with irrelevant details ... probably to make it hard to figure out what is really going on.

After a lot of studying, I think HAMET should be revamped using the attached very short document as a starting point. I think it would solve most of your problems while supporting the Army and hurting your neighbors as little as possible.

KC Jones



SIMPLIFIED HAMET PLAN.pdf

20K

A NEW SIMPLE AND LOGICAL HAMET PLAN (THE BASICS)

1. Ask the Army to define new smaller Mountain Training Areas (MTA's) that are contained entirely within BLM lands.
2. Ask the Army to define Landing Zones that are at least 1000 meters inside the MTA's.
3. Try to pick MTA's and LZ locations that are in remote areas of BLM land not frequently used by the public and for the grazing of cattle.
4. Require the Army to fly at 500 feet and above while conducting HAMET operations while not over BLM lands. (Tell the Army this: "Army, if you want to land on BLM property, then you need to do this to avoid having the public mad at us for letting you do it.")
5. Authorize the Army to fly at 200 feet or above when over BLM MTA's.
6. Authorize the Army to fly as low as desired within 1000 meters of a BLM LZ.



HAMET and the FAA

KC Jones <kcj@ccvnet.net>
To: KC Jones <kcj@ccvnet.net>

Fri, Jan 2, 2015 at 2:59 PM

Back on November 22, I sent an email to the FAA concerning the issue of Military helicopters training in residential neighborhoods. The email probably was sent via this [FAA Email Form](#). I sent several via different routes because I didn't know who I should be contacting.

I have received a written reply from David Menzimer (Manager, Technical Standards Branch, General Aviation, Flight Standards Northwest Regional Office), dated December 12th in which he says the FAA does not regulate military training operations. However, the FAA says they did contact Fort Carson and also reviewed the training proposal on the BLM web site. They then go on to say that all LZ's with the exception of 704 appear to be in remote areas and well clear of occupied buildings. Here is a quote from their letter: "[According to the published plan](#), LZ HLZ704, which is near your residence, has been omitted from the plan, and should no longer be a concern."

They say helicopters can fly below the usual minimum safe altitude provided they can do so safely. Another quote from their letter: "This usually means that during any phase of operation the helicopter should be at an altitude that would not create an actual hazard and that would allow the pilot to maneuver away from persons or property should a failure occur."

My comments: I would have to assume that "failure" in the above paragraph must mean "loss of power" because there are obviously some failures that would prevent the pilot from maneuvering at all. We also have the high altitude concern here where a pilot can simply "lose control" of his aircraft. I have been trying to learn to fly a quadra-copter drone. Believe me, it is really tricky. As I recall, fixed wing aircraft are required to fly at a minimum safe altitude of 2000 feet when over a congested city area. The assumption must be that the plane would be able to glide to a safe landing/crash site (i.e., an open field). A disabled helicopter 50 feet over your house is

not going to be able to do much to avoid landing on you.

Note that the letter implies that the Army has already eliminated LZ 704 based on something the FAA found in the plan they say they looked at. Or maybe the Army told them 704 had be eliminated in a phone call. I don't think the published plan on the BLM web site has been revised and the [Proposed Landing Zones KMZ File](#) on the web site showing the locations of LZ's also appears to be unchanged. Maybe there is an updated plan we have not been shown yet.

I would also note that while LZ 704 is near my residence, LZ 703 is much closer and LZ's 702 and 705 are just as close as LZ 704. I didn't tell the FAA exactly where my residence is so I'm not sure what information they are basing their statement on concerning my residence being close to LZ 704 other than my street address.

KCJ



Fwd: FW: HAMET - Possible Obstruction (UNCLASSIFIED)

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Wed, Dec 31, 2014 at 10:26 AM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: Garner, Billie J CIV (US) <billie.j.garner.civ@mail.mil>
Date: Thu, Dec 11, 2014 at 3:39 PM
Subject: FW: HAMET - Possible Obstruction (UNCLASSIFIED)
To: "Keohane, Nancy" <nkeohane@blm.gov>, "Kimber, Kenneth W CW4 USARMY (US)" <kenneth.w.kimber.mil@mail.mil>, "Taijeron, Fredrick S CIV (US)" <fredrick.s.taijeron.civ@mail.mil>, "Sartori, Timothy E MAJ USARMY 4 ID (US)" <timothy.e.sartori.mil@mail.mil>

Classification: UNCLASSIFIED
Caveats: NONE

Good afternoon! You may have already received this information so my apologies if this is a duplicate. See e-mail below.

VR,
- Ms. Billie Garner
Fort Carson Garrison Public Affairs
Chief, Community Relations
ATTN: IMCR-PA
1625 Ellis St., Bldg. 1218, Rm. 323
Fort Carson, CO 80913-5119
(719) 526-1246 - DSN 691
(719) 526-1021 - FAX
billie.j.garner.civ@mail.mil or billie.garner@us.army.mil

Official Mailing Address:
Department of the Army, Garrison Public Affairs Office IMCR-PA, 1626 Ellis Street, Bldg. 1118, Ste. 200 Fort Carson, CO 80913

Your opinion is important - Please tell us how we are doing:
https://ice.disa.mil/index.cfm?fa=card&service_provider_id=95425&site_id=437&service_category_id=2

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

From: KC Jones [mailto:kcj@ccvnet.net]
Sent: Friday, December 05, 2014 1:44 PM
To: USARMY Ft Carson HQDA OCPA List PAO MEDIA RELATIONS; USARMY Ft Carson HQDA OCPA List

PAO COMREL
Subject: HAMET - Possible Obstruction

I attended the HAMET meeting last night at the Cripple Creek Heritage and Information Center.

If you were there, I'm the person who made the comment about 46 houses in the 1000 meter circles around Landing Zones 410 and 701 thru 705. You probably gave me a copy of the "Fort Carson Training Noise Management Guide."

I don't know how to get information to the Aviation Brigade but I thought I should let somebody know the following:

I am an amateur radio operator and have a "portable" mast used to support a wire antenna system. The mast "telescopes" to a height of approximately 50 feet. It consists of seven 8-foot sections of low visibility gray fiberglass tubing with the bottom section being 2-1/2 inches in diameter and the top section being 1 inch in diameter. I will be painting the fitting at the very top of the mast International Orange but for the most part the antenna is designed to be hard to see to keep my Property Owners Association happy. The mast, when extended, is guyed at three levels (not counting the antenna wire at the top) with very thin but very strong black antenna rope (think something like Kevlar). The mast supports an "inverted vee" (black) wire antenna that extends outward 100 feet in opposite directions hitting the ground at 100 feet from the base of the mast. The wire antenna is designed to be rotatable into three different orientations (so ... 50 feet high in the middle slopping to the ground 100 feet in opposite directions).

This antenna, when in use, will be located within 100 feet of the following location:

N 38.75303
W 105.26717

This is on the valley floor along Four Mile Creek 2.672 miles (2.322 nautical miles) almost due west (266 degrees) of the peak of Mount Pisgah.

A couple of weeks ago, two military helicopters came by during the day at an altitude that may have been low enough to "clip" this antenna system ... which was not extended at the time. However, the antenna may be extended at any time of day or night, but 95% of the time it will be retracted and about 10 feet tall.

Please pass this along to the right people, and let me know if I need to do more.

K.C. Jones
Florissant, CO

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE



Fwd: Comments on HAMET site surveys and proposal

Jim Smith <jimandrobertasmith@gmail.com>
To: Nancy Keohane <rgfo_comments@blm.gov>
Cc: Doug Boucher <dwboucher3@gmail.com>

Wed, Dec 17, 2014 at 7:19 PM

Nancy,
I am forwarding Doug's comment to you regarding HAMET for your review. Please let me know if you need anything else.

Thanks,
Jim

----- Forwarded message -----

From: **Guffey Shares** <share@guffeynews.com>
Date: Wed, Dec 17, 2014 at 7:29 AM
Subject: Comments on HAMET site surveys and proposal
To: Doug Boucher <dwboucher3@gmail.com>

Please see my two pages of comments on the HAMET proposal. My experiences with conducting site surveys for the USAF are pertinent. Douglas W. Boucher, Major, USAF, Retired

--
Roberta & Jim Smith
Guffey, Colorado
Fax: 1-866-679-5231
In God We Trust
No Longer Silent



HAMET Impact and my experience with Air Force Site Surveys.docx

17K



Fwd: Fwd: US Army High Altitude Mountain Environment Training (HAMET)

Jim Smith <jimandrobotasmith@gmail.com>

Mon, Dec 15, 2014 at 3:47 PM

To: Lee Colburn <lee.colburn@mail.house.gov>

Cc: Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>, share@guffeynews.com

Of course. Thank you so much for your effort Mr. Colburn, it is much appreciated. We will be looking forward to your response. Will you send it by email to conserve our time, please.

Thank you again,

Jim Smith

District 5 Constituent

Guffey, CO 80820

[719-689-5643](tel:719-689-5643)

On Mon, Dec 15, 2014 at 3:31 PM, Colburn, Lee <Lee.Colburn@mail.house.gov> wrote:

Jim,

Thanks for the email. I am working with the District Director and the Congressman on getting you a written response. I think that it will be a day or two before I can get you something since it needs to be coordinated with the Congressman.

Thanks,

Lee Colburn

From: Jim Smith [mailto:jimandrobotasmith@gmail.com]

Sent: Monday, December 15, 2014 2:43 PM

To: Colburn, Lee

Cc: Heather Lynn; Nancy Keohane

Subject: Re: Fwd: US Army High Altitude Mountain Environment Training (HAMET)

Mr. Colburn,

I would like Congressman Lamborn to state his position in writing to me regarding his approval or disapproval of the HAMET (High Altitude Mountain Environment Training) Program as soon as possible. The person who took my call at your office in Colorado Springs told me that you are the one that would handle my request. Our deadline is December 19 for comments from the public to the BLM. I really would like to know if Congressman Lamborn will be for us (the citizens of District 5 in Park and Fremont Counties) or against us regarding this much opposed program. I have to presume that his answer is "against" if we don't hear back from him before the 19th. I need to notify all of his constituents in District 5 as to whether he will be helping us combat this program so I can further notify the BLM. Please coordinate this request for information with Congressman Lamborn quickly. You can see we don't have much time left.

Thank you so much in advance,

Sincerely,

Jim Smith

District 5 Constituent

Guffey, CO 80820

[719-689-5643](tel:719-689-5643)

On Mon, Dec 15, 2014 at 6:15 AM, Colburn, Lee <Lee.Colburn@mail.house.gov> wrote:

Sir,

I was off Friday on Vacation and the office did not have access to my personal schedule. I have a downtown Regional Business Alliance meeting at 8:00 and do not know when it will conclude. I will attempt to be back in the office by 10:00 but I cannot guarantee that. Please plan accordingly. I will be there shortly thereafter. Please also understand that I do not make the Congressman's policy or positions on military matters, but will be glad to listen and relay.

Lee Colburn

From: Jim Smith [mailto:jimandrobotasmith@gmail.com]
Sent: Friday, December 12, 2014 07:27 PM Eastern Standard Time
To: Colburn, Lee
Subject: Fwd: US Army High Altitude Mountain Environment Training (HAMET)

----- Forwarded message -----

From: **Jim Smith** <jimandrobotasmith@gmail.com>
Date: Fri, Dec 12, 2014 at 5:20 PM
Subject: US Army High Altitude Mountain Environment Training (HAMET)
To: Congressman Doug Lamborn <co05ima@mail.house.gov>
Cc: Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>, Mike Brazell <mbrazell@parkco.us>

Dear Mr. Colburn,

I sent this email but forgot to add your name to the CC: list. I hope to contact you personally on Monday morning around 10:00 AM. I was directed by your office to speak to you as the person in charge of addressing our issue with the US Army.

Sincerely,

Jim Smith

4858 Hwy 9

Guffey, CO

[719-689-5643](tel:719-689-5643)

Dear Congressman Lamborn,

We are very concerned about the HAMET program. The Army has applied to the BLM for a 10 year permit allowing them to use over 35,000 acres of land for Landing Zones that provide them with areas to train in low level flying and landing. The land is in Park and Fremont counties, your Congressional District.

We have just found out within the last few weeks that this was happening giving us precious little time to document our objections. I am very much hoping that you will intervene for us in a way that gives us time to document the many, many objections we have to this program so that we can submit them to the BLM. BLM has given us a deadline of Dec. 19 to provide our comments but we are a very spacious county and it is sometimes difficult to communicate with all of our very interested citizens quickly. TIME IS OF THE ESSENCE. Please take time to read and understand the very real objections we all have to this program of invasion.

Following are links to much of the descriptive documentation regarding HAMET and a couple of powerful statements by citizens of your congressional district that plead for your assistance.

About the proposal

The BLM Royal Gorge Field Office received an application and a Plan of Development (POD) from the US Army Fort Carson requesting the use of public lands to conduct High Altitude Mountain Environment Training (HAMET). The BLM is in the planning stages for the preparation of a National Environmental Policy Act (NEPA) document to evaluate the potential environmental effects of HAMET on BLM lands. The purpose of NEPA is to encourage public participation and actively inform the public, organizations, government agencies, Indian tribes and elected officials about the proposed action and to receive public input during the environmental review.

[Casual Use Letter](#) - The casual use letter dated May 1, 2013, represents the most recent coordination with the Army related to HAMET exercises on BLM lands.

[Plan of Development](#) - The POD represents the highest level of use the Army projects could occur on BLM lands. Current use is much less and can be found in the Casual Use Letter.

[Exhibit 1 - Area of Activity](#)

[Exhibit 2 - Helicopter Landing Zones](#)

[Exhibit 3 - Aircraft Type](#)

[Exhibit 4 - Noise Study](#)

[IM 2001-030 Military Use On and Above Public Lands](#) - This IM is a compilation and restatement in a single document of statutory, regulatory and policy guidance that affect the authorization of military activities that may impact public lands managed by BLM.

[Attachment 1 - Military Activities on the Public Lands](#)

[Attachment 2 - Definitions and Acronyms](#)

Public Meeting Documents

- [BLM Presentation](#)
- [Fort Carson Presentation](#)
- [Video \(YouTube\)](#)
- [Map 1](#)
- [Map 2](#)
- [Comment Form](#)

Map Files

[Proposed Landing Zones KMZ File*](#)

[BLM Land Ownership KMZ File*](#)

*Google Earth is the best way to open the KMZ file. Download the KMZ file to your computer, right click on the file, hover over open with, and select Google Earth.

Some Citizen Comments

Heather Lynn

In the southeastern part of Park County, Colorado, (the Guffey area), residents are facing a huge encroachment on their quiet and peaceful lives, safety and the lives of all animals both large and tiny, wild and tame. It has come to my attention that Mr. Mike Brazell has not at all been informed of this situation and so I am writing to both you and him.

The Army has a high altitude-training program called HAMET. This program includes having 47 landing zones surrounding the Guffey area. Each landing zone includes 1000m-diameter circle or over 700 acres each and the total is over 36,000 acres that the Army wants for training. This program REQUIRES pilots to fly 40 feet above the ground from one landing zone to another. So whether you live near a landing zone or not, you will be effected by the heavy aircraft flying low. When answering a question asked by fire chief, Don, of the Four Mile F.D. regarding who is responsible for responding to a crash, the Army stated, Don stated his concern over auto crashes happening when people are trying to see Flight for Life. He also stated that the airspace around Pikes Peak would be compromised if this HAMET is allowed. He was serious when he told the Army that Flight for Life will NOT be able to fly while airspace is compromised and people who are in need of life saving measures will not get them. "We will run the other way and your county or local Fire Dept. will assume responsibility both physically and financially."

The total landings the Army proposed is over 20,000 per year. The "casual use" easement the Army hopes to get, lasts for 10 years. When challenged regarding the legality of acreage allowed for this type of application and whether the Army knew this much acreage must have an Act of Congress to obtain, the Army representative replied, "NO." He said they will not reapply properly. There are many homes whose location has not been taken into account leaving many homes inside landing zones and some homes in numerous landing zones. This is because the Army used maps that they stated at a public meeting on December 4th, were in fact possibly 5 years old. The Army admitted they did not "Look under the trees."

I think it is important to note that NO announcements were shared with the Guffey Community. No one called our fire chief nor our commissioner to get the word out, no one bothered to let us know that a meeting was occurring a month ago on this issue and no one notified us when another meeting was scheduled. Unless we get the Gazette out of Co Spgs, we would not have seen the Army's press release.

...

I think it is imperative to share with you that the entire 4 Mile Creek valley is in line for designation as a Conservation Area. I would also like to inform you that the Army thinks we all live in the middle of nowhere. This is far from the truth since Guffey Gorge saw more than 12,000 visitors last summer!

Please take the time to look over the documents I have included in this email. Look carefully at the letters from the residents.

Andrea Jones

The request for a permanent grant of Right of Way for use of BLM-administered lands in Teller, Fremont, and Park counties for use by the Army's HAMEY program would appear to be a de facto expansion of the Fort Carson military base. The scale of the landscape impacted by this proposal far exceeds the 234+ acres involved in the 43 specified landing zones: the boundaries of the Mountain Training Areas (MTAs) outlined in maps provided by the Army encompass thousands of acres (the tally of acreage is, rather conveniently, not provided in the Plan of Development documentation). These MTAs include extensive private property holdings. According to the Plan of Development, "A large portion of the qualification course (HAMEY) requires aircrews to conduct Mountain Navigation as a task" (3.f). Mountain Navigation calls for low-level flights, as low as 80 feet, which would be permitted throughout the MTAs, apparently without regard to the individual or agency who owns the underlying property. The ramifications of this plan extend well beyond the land holdings of the BLM, and the grant of Right of Way by the BLM for the Army's plan as it is written is clearly an overreach. A BLM Right of Way agreement does not address the effects of noise and the sudden appearance of fast-moving helicopters that will occur throughout the MTAs, including over private property.

Assuming, however, that the current review process is the appropriate and legal channel for this action, I do not see how the Plan of Development can be reconciled with the **BLM's mission to "manage and conserve the public lands for the use and enjoyment of present and future generations under a mandate of multiple-use and sustainable yield."**

From a wildlife management standpoint alone, disturbances from an annual minimum of more than 2100 proposed landings, with associated low-level exercises and transit flights, should be grounds for rejecting this Plan of Development. Noise from flights transiting to and from the landing zones at the specified minimum altitude of 500 feet would qualify as a "highly" annoying to a significant proportion of people, based on the Army's noise study—which does not account for potential amplification of noise by the mountainous terrain. Wildlife sensitivity to noise will be even higher. Direct effects, such as panicked flight into fences or ravines, will cause injuries and death not only around the landing zones but also throughout the much larger MTAs as a result of low-level flying. More indirect impacts on migration and feeding patterns will undoubtedly occur throughout the MTAs, violating the ideal of sustainable yield.

Disruptions of game species will, in turn, affect hunting, which is a part of the BLM's multiple-use mandate. Other conflicts with multiple-use include livestock grazing (cattle will be subject to the same disruptions as wildlife) and outdoor recreational activities. Given the potential for "continuous sorties throughout the year" (Section 3.c.1), hiking, camping, biking, and horseback riding will be virtually impossible around the landing areas, where helicopters will be allowed to fly as low as 25 feet in Contour and Nap of Land maneuvers. Noise and fast-moving aircraft will, once again, affect all users (and landowners) throughout the MTAs, which extend from Highway 50 to northwest of Cripple Creek. Helicopter noise will extend to Cripple Creek, Victor, Cañon City, and the Gold Belt Tour Scenic Byway, with potentially significant economic implications for the region's tourist economy. At a time when Cañon City is trying to build a reputation as an outdoor recreation destination, granting permanent military use of vast swatches of the local landscape is counterproductive.

On a more personal note, the MTAs lie to the east, south, and west of our property. Having experienced HAMEY operations conducted under the Casual Use agreement between the BLM and Fort Carson in 2012, I am aware of the effects of helicopter flights in this area. The noise and disruptions from low flying aircraft under the proposed plan would mean a wholesale lifestyle change for us and our neighbors. We will be affected by virtually all of the proposed flights, since helicopter landing activity in Training Areas 7 and 4 is audible at our home throughout the landing operations, and use of areas 5, 6E, and 6W typically involves overflight of the area where we live. Noise will affect our local wildlife populations, which include elk, deer, bighorn sheep, bear, mountain lions, and bobcats in addition to smaller mammals and birds. I work from home, and noise and disruptions from helicopter traffic threaten both the natural ecosystems about which I write and the conditions of serenity that enable that work. Having experienced multiple violations of the 500' minimum flying altitude during the 2012 operations, I am concerned that the current Plan of Development

offers no provision for landowner recourse when such violations occur. This is of particular concern because we own horses, who are subject to bolting when a helicopter blasts over the ridge. This is not only a risk to the horses' safety but also to that of me and my husband if we are riding at the time.

This area is a patchwork of public lands, ranches, and rural subdivisions. Undeveloped areas provide wildlife habitat as well as scenic beauty, outdoor recreation opportunities, and pasture land. People move to a place like this in large part because it is quiet. The HAMET program is not only a direct threat to quality of life, but will also impose negative economic pressures on residential landowners. Land values are based largely on intangible aesthetic factors such as scenic vistas, intact natural areas, and serenity. Although helicopter flights don't necessarily ruin the view, their disruptions to local ecosystems and quietude certainly conflict with other perceived values. Residents—particularly those with property inside the boundaries of the MTAs—will likely see property values decrease, and those who might elect to move to escape the noise may find it difficult to sell their property at market values comparable to either historic levels or to areas that are not encumbered by what will be a military exercise zone, in fact if not in name.

If the BLM does decide to grant a Right of Way for this program—and, again, I question whether the agency has the authority to permit a program with such extensive implications for private landowners—restrictions should be put in place that limit flying days, either in the form of specified flying periods or a defined number of days that flying is allowed on an annual basis. The 2012 operations set a precedent for the former model. While the intensity use during those periods was unpleasant and doubtless put enormous stress on the wildlife of the area, I feel that regulating flying days in this way is a lesser evil than granting the Army an unrestricted Right of Way for “continuous sorties throughout the year” over a landscape loved by me and my neighbors.

—

Roberta & Jim Smith
Guffey, Colorado
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In God We Trust

No Longer Silent

—

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HAMET Comment Form

Jim Smith <jimandrobertasmith@gmail.com>

Wed, Dec 17, 2014 at 12:51 PM

To: share@guffeynews.com

Cc: Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>

Hi All,

The attached file is the BLM Comment form supplied on [HAMET.BLM](#). Please provide your comments to Nancy on this form ASAP.

If this is the first time you have heard of HAMET, please go to [HAMET.BLM](#) and read up on what this US Army Project is all about. I am personally very much opposed to this High Altitude Mountain Environment Training Project because 5 Landing Zones are just over the hill from my property and the US Army will probably by "low flying" right over my house for the next 10 years practicing landings and takeoffs.


Public Comments are due by December 19, 2014. That's this Friday. If you can, please take a careful look at the [Proposed Landing Zones KMZ File](#)* using Google Earth to get a good picture of the massive scope of this Project. Let me know by reply email if you have any questions. I really need help researching [Attachment 1 - Military Activities on the Public Lands](#)
[Attachment 2 - Definitions and Acroynms](#).

I think we need all of the residents of Park and Fremont Counties to be aware of what the Military is trying to do right here in our home country. I have a hunch most of us will be opposed to them using over 35,000 acres of Public land not even mentioning all of the Private Land that will be flown over.

Thanks to all for any help you can provide in getting Public Comments to the BLM.

Jim

--
Roberta & Jim Smith
Guffey, Colorado
Fax: [1-866-679-5231](tel:1-866-679-5231)
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 **HAMET_Comment.pdf**
62K



Re: HAMET

Jim Smith <jimandrobotasmith@gmail.com>

Wed, Dec 17, 2014 at 11:45 AM

To: "Dreher - DNR, Brian" <brian.dreher@state.co.us>

Cc: Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>, Mike Brazell <mbrazell@parkco.us>, share@guffeynews.com, Lee Colburn <lee.colburn@mail.house.gov>

Brian,

Thanks for the quick reply Brian. It looks like you guys will have quite a chore covering the 43 Landing Zones proposed by the HAMET Project if you are going to assess the impact on each Landing Zone individually. Could we be placed on your distribution list so we know what your finding is on each individual Landing Zone. I will be extremely interested in the impacts on the elk and deer and eagle populations. I am also very interested in any data you currently have on the barn owl population in southern Park County. The eagle and barn owl raptors are key elements in controlling the "picket pen" population on my grass pastures.

Thanks again Brian,

Jim

On Wed, Dec 17, 2014 at 8:58 AM, Dreher - DNR, Brian <brian.dreher@state.co.us> wrote:

Jim,

CPW staff met me with the BLM yesterday to review the project. We are in the process of reviewing this project as it relates to wildlife.

Brian

On Mon, Dec 15, 2014 at 5:53 PM, Jim Smith <jimandrobotasmith@gmail.com> wrote:

Brian,

If you go to [HAMET.BLM](#) you will see the BLM description of this Military Plan. We are concerned about the possible impacts of this program on our land, Public and Private. We think you, as a representative of the Colorado Division of Wildlife have a large interest in this program and we are extremely interested in finding out exactly where you folks stand. I know I have a large Elk herd (around 300 to 500) that visits my property every winter and I am in the Landowner Preference Program and would not like to see the elk herds driven off by extremely low flying helicopters. Nor would I want to listen to these flights. We have experience hearing them from their previous program.

There are many, many questions regarding the exact application that the Military is asking for in their permit application but we have just learned of the program and have a deadline of Dec 19, 2014 to provide Public comments.

Can you provide any help to us in halting or delaying the BLM approval? It feels like they are shoving this down our throat and we are vehemently opposed to approving what we don't know the content of.

Do you folks at the Division of Wildlife have any existing studies regarding impact of low flying helicopters in mountain environments? I looked carefully at the map of the proposed landing zones and found at least 4 that are only about 3 miles south of my property on Hwy 9 but many more are right in the middle of elk and deer home country. Plus we have golden eagles here that help control the rodent populations which is imperative in keeping my pasture grasses healthy.

Please take a careful look at this project and let us know by reply email what your stance is at DOW on this. I need everything I can get to help with our conversation with BLM on this HAMET program.

Thank you sincerely in advance for your prompt attention to this matter.

Sincerely,

James E. Smith
Citizen Guffey, Park County, Colorado, USA
[719-689-5643](tel:719-689-5643)

—
Brian Dreher
Senior Wildlife Biologist
Southeast Region



COLORADO

Parks and Wildlife

Department of Natural Resources

P [719-227-5220](tel:719-227-5220) | F [719-227-5297](tel:719-227-5297) |
4255 Sinton Rd., Colorado Springs, CO 80907
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—
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Fwd: HAMET

Jim Smith <jimandrobertasmith@gmail.com>

Mon, Dec 15, 2014 at 6:15 PM

To: kevin@kevingrantham.com

Cc: Heather Lynn <utiart@gmail.com>, share@guffeynews.com, Nancy Keohane <rgfo_comments@blm.gov>, Lee Colburn <lee.colburn@mail.house.gov>, Mike Brazell <mbrazell@parkco.us>

Senator Grantham,

If you go to [HAMET.BLM](#) you will see the BLM description of this Military Plan. We are concerned about the possible impacts of this program on our land, Public and Private. We think you, as a representative of our District have a large interest in this program and we are extremely interested in finding out exactly where you stand.

There are many, many questions regarding the exact application that the Military is asking for in their permit application but we have just learned of the program and have a deadline of Dec 19, 2014 to provide Public comments.

Can you provide any help to us in halting or delaying the BLM approval? It feels like they are shoving this down our throat and we are vehemently opposed to approving what we don't know the content of.

Do you have any existing studies regarding impact of low flying helicopters in mountain environments? I looked carefully at the map of the proposed landing zones and found at least 4 that are only about 3 miles south of my property on Hwy 9 but many more are right in the middle of elk and deer home country.

Please take a careful look at this project and let us know by reply email what your stance is at DOW on this. I need everything I can get to help with our conversation with BLM on this HAMET program.

Thank you sincerely in advance for your prompt attention to this matter.

Sincerely,
James E. Smith
Citizen Guffey, Park County, Colorado, USA
[719-689-5643](tel:719-689-5643)



HAMET

Jim Smith <jimandrobertasmith@gmail.com>

Wed, Dec 17, 2014 at 4:41 PM

To: share@guffeynews.com, Heather Lynn <utiart@gmail.com>, Nancy Keohane <rgfo_comments@blm.gov>

For all near Guffey residents is the following picture of all the Army's proposed Landing Zones for HAMET Project. The little icon just above Landing Zone 603 is Rita's Place according to Google Earth if you zoom in on it. The pic is an image saved from the Army file using Google Earth.

--

Roberta & Jim Smith
Guffey, Colorado
Fax: 1-866-679-5231
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HAMET_All_Proposed_LandingZones.jpg
106K



Fwd: Please read letter in PDF

Jim Smith <jimandrobertasmith@gmail.com>

Thu, Dec 18, 2014 at 3:02 PM

To: Nancy Keohane <rgfo_comments@blm.gov>

Cc: share@guffeynews.com, Heather Lynn <utiart@gmail.com>

Verene,

I read the pdf letter and I am forwarding it to Nancy Keohane at BLM if that's ok with you. She is the one receiving comments from the Public and she definitely needs to see this one. All of the residents of the 3 Counties mentioned in the letter should be informed of the proposal so that they all can comment on the proposed invasion. Since we are pulling out of Afghanistan, I wonder why they are proposing high altitude training for the next 10 years in the first place. Seems to me like they should be training for desert operations.

Thanks for your participation Verene,

Jim

--

Roberta & Jim Smith

Guffey, Colorado

Fax: 1-866-679-5231

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HAMET_ROW_Response_Letter.docx

17K



PIKES PEAK HISTORICAL SOCIETY
P.O. Box 823
Florissant, CO 80816

719-748-8259

OFFICERS:

Celinda R. Kaelin
President

December 19, 2014

John Rakowski
V. President

Nancy Keohane
BLM

Pam Adams
Secretary (Pro
Tem)

RE: HAMET Training in Teller County

Terry Rank
Treasurer

Dear Ms. Keohane;

BOARD:

The Board of Directors of the Pikes Peak Historical Society has authorized me to send a letter of concern over the proposed HAMET training site in the 4 Mile region of Teller and Park County.

Scott Adams

Tom Healy

This proposed training site is of great interest to the Pikes Peak Historical Society, as it contains numerous Ute culturally scarred trees, Ute forts and vision quest sites, and other archaeological sites. These culturally scarred trees have been documented, and are considered Living Artifacts. There are many other viable training sites available, and we respectfully request that an alternate site be used to minimize impact on these archaeological treasures.

Wayne Johnston

Harold Kaelin

Kathy Perry

Rudy Perry

Brian Stewart

The Pikes Peak Historical Society maintains an endowment fund to return the Tabeguache Utes to their culture area each year for their sacred ceremonies. We have done this for the past fifteen years. I have attached a map of the Ute culture areas for your information. If you have any questions, you may call me at 719-748-3562 or email me at Celinda@att.net.

ADVISORY
BOARD:

Lenore Hotchkiss

Thank you for helping us to preserve the history and the culture of the First Nations of the Pikes Peak region.

AJ Hotchkiss

Sally Maertens

Sincerely,

Andy Weinzapfel

Susan Weinzapfel

Celinda Kaelin, President and Historian

Cc: PPHS Board, Congressman Lamborn, Park County, Teller County, Northern Ute Nation, Senator Bennett, area residents

Auditory and non-auditory effects of noise on health

Mathias Basner, Wolfgang Babisch, Adrian Davis, Mark Brink, Charlotte Clark, Sabine Janssen, Stephen Stansfeld



Noise is pervasive in everyday life and can cause both auditory and non-auditory health effects. Noise-induced hearing loss remains highly prevalent in occupational settings, and is increasingly caused by social noise exposure (eg, through personal music players). Our understanding of molecular mechanisms involved in noise-induced hair-cell and nerve damage has substantially increased, and preventive and therapeutic drugs will probably become available within 10 years. Evidence of the non-auditory effects of environmental noise exposure on public health is growing. Observational and experimental studies have shown that noise exposure leads to annoyance, disturbs sleep and causes daytime sleepiness, affects patient outcomes and staff performance in hospitals, increases the occurrence of hypertension and cardiovascular disease, and impairs cognitive performance in schoolchildren. In this Review, we stress the importance of adequate noise prevention and mitigation strategies for public health.

Introduction

Evolution has programmed human beings to be aware of sounds as possible sources of danger.¹ Noise, defined as unwanted sound, is a pollutant whose effects on health have been neglected, despite the ability to precisely measure or calculate exposure from peak levels or energy averaged over time (panel 1, figure 1). Although people tend to habituate to noise exposure, degree of habituation differs for individuals and is rarely complete.² If exposure to noise is chronic and exceeds certain levels, then negative health outcomes can be seen. Health effects were first recognised in occupational settings, such as weaving mills, where high levels of noise were associated with noise-induced hearing loss.³ Occupational noise is the most frequently studied type of noise exposure. Research focus has broadened to social noise (eg, heard in bars or through personal music players) and environmental noise (eg, noise from road, rail, and air traffic, and industrial construction). These noise exposures have been linked to a range of non-auditory health effects including annoyance,⁴ sleep disturbance,⁵ cardiovascular disease,^{6,7} and impairment of cognitive performance in children.⁸ The health effects of noise from entertainment venues and from neighbours are elusive, but nevertheless, cause many complaints to local authorities. The meaning attributed to sounds might affect our response to them—eg, the response to aircraft noise might differ between an airport employee and a resident who fears long-term health consequences due to the noise exposure. Noise is pervasive in urban environments and the availability of quiet places is decreasing. In the European Union, about 56 million people (54%) living in areas with more than 250 000 inhabitants are exposed to road traffic noise of more than average L_{DEN} 55 dB per year, which is thought to be risky to health.⁹ Thus, understanding of occupational and environmental noise is important for public health. In this Review, we summarise knowledge and research related to noise exposure and both auditory and non-auditory health effects.

Auditory health effects

Noise-induced hearing loss

Noise is the major preventable cause of hearing loss. Noise-induced hearing loss can be caused by a one-time

exposure to an intense impulse sound (such as gunfire), or by steady state long-term exposure with sound pressure levels higher than L_A 75–85 dB—eg, in industrial settings. The characteristic pathological feature of noise-induced hearing loss is the loss of auditory sensory cells in the cochlea. Because these hair cells cannot regenerate in mammals, no remission can occur; prevention of noise-induced hearing loss is the only option to preserve hearing. Hearing loss leading to the inability to understand speech in everyday situations can have a severe social effect. It can also affect cognitive performance and decrease attention to tasks. Accidents and falls are also associated with undiagnosed hearing loss, with excess mortality of 10–20% in 20 years.¹⁰

Noise-induced hearing loss is a public health problem. Global Burden of Disease 2010¹¹ estimated that 1·3 billion people are affected by hearing loss and investigators rated hearing loss as the 13th most important contributor (19·9 million years, 2·6% of total number) to the global years lived with disability (YLD). Adult-onset hearing loss unrelated to a specific disease process accounted for 79% of YLD from hearing loss. In the USA and Europe, 26% of adults have a bilateral hearing disorder that impairs their ability to hear in noisy environments, and a further 2% have substantial unilateral hearing issues. Age-adjusted prevalence is similar in Asia.¹² WHO estimates that 10% of the world population is exposed to sound pressure levels that could potentially cause noise-induced hearing loss. In about half of these people, auditory damage can be attributed to exposure to intense noise.¹³

Search strategy and selection criteria

We searched PubMed, Science Citation Index Expanded, and Social Sciences Citation Index, and references from relevant articles for English language articles from Jan 1, 1980, to Feb 1, 2013, using the search terms: “hearing loss”, “tinnitus”, “annoyance”, “cardiovascular disease”, “hypertension”, “high blood pressure”, “myocardial infarction”, “stroke”, “sleep”, “cognitive performance”, “reading ability”, and “hospital”, in combination with “noise”. Each author did their own search, and is also a subject matter expert in their field. We focused on articles published in the past 5 years; however, used older articles if they represent seminal research or are necessary to understand more recent findings. We included reports from recent meetings if we regarded them to be relevant.

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Unit for Experimental Psychiatry, Division of Sleep and Chronobiology, Department of Psychiatry, University of Pennsylvania Perelman School of Medicine, Philadelphia, PA, USA (M Basner MD); Department of Environmental Hygiene, Federal Environment Agency, Berlin, Germany (W Babisch PhD); Public Health England, Wellington House, Waterloo Road, London, UK (Prof A Davis PhD); Ear Institute, University College, London, UK (Prof A Davis); D-MTEC Public and Organizational Health, ETH Zurich, Zurich, Switzerland (M Brink PhD); Centre for Psychiatry, Wolfson Institute of Preventive Medicine, Barts and London School of Medicine and Dentistry, Queen Mary University of London, UK (C Clark PhD, Prof S Stansfeld PhD); and Department of Urban Environment and Safety, TNO (Netherlands Organization for Applied Scientific Research), Delft, Netherlands (S Janssen PhD)

Correspondence to: Dr Mathias Basner, Unit for Experimental Psychiatry, Division of Sleep and Chronobiology, Department of Psychiatry, University of Pennsylvania Perelman School of Medicine, Philadelphia, PA 19104-6021, USA
basner@upenn.edu

Panel 1: Glossary of terms used to describe sound**Sound pressure level**

Sound pressure level is a logarithmic measure of the effective pressure of a sound relative to a reference value. It is measured in decibels (dB, see below) higher than a reference level. The reference sound pressure in air is 20 μPa (2×10^{-5} Pa), which is thought to be the human hearing threshold at a sound frequency of 1000 Hz.

dB scale

A logarithmic scale to measure sound pressure level. A two-fold increase in sound energy (eg, two identical jackhammers instead of one) will cause the sound pressure level to increase by 3 dB. A ten-fold increase in sound energy (10 jackhammers) will cause the sound pressure level to increase by 10 dB, which is perceived as about twice as loud.

 L_{max}

The highest sound pressure level in a given time period.

 L_{eq}

Average level of sound pressure within a certain time period. If the A-filter is used for frequency-weighting (figure 1), the average level is referred to as L_{Aeq} . The filter and time period used for averaging are often indicated in subscript—eg, L_{Aeq8h} , $L_{\text{Aeq23-7hr}}$, or L_{night} .

 L_{DEN}

L_{DEN} (Day-Evening-Night-Level), also referred to as DENL, is the A-filtered average sound pressure level, measured over a 24 h period, with a 10 dB penalty added to the night (2300–0700 h or 2200–0600 h, respectively), and a 5 dB penalty added to the evening period (1900–2300 h or 1800–2200 h, respectively), and no penalty added to the average level in the daytime (0700–1900 h or 0600–1800 h, respectively). The L_{DN} measure is similar to the L_{DEN} but omits the 5 dB penalty during the evening period. The penalties are introduced to indicate people's extra sensitivity to noise during the night and evening. Both L_{DEN} and L_{DN} are based on A-weighted sound pressure levels, although this factor is not usually indicated in subscript.

Tinnitus—ie, change in sound perception, such as ringing, that cannot be attributed to an external source—often follows acute and chronic noise exposure, and persists in a high proportion of affected individuals for extended periods.¹⁴ Tinnitus can affect quality of life in several ways, including through sleep disturbance, depression, or the inability to sustain attention.¹⁵ The fact that hearing loss and tinnitus are reported in combination suggests that both symptoms share common pathophysiological pathways.

Occupational noise-induced hearing loss

Despite the introduction of standards for hearing protection, reduction in occupational noise exposure in developed countries, and extensive public health efforts, hearing loss induced by exposure to occupational noise remains a dilemma and is the focus of extensive research. Noise-induced hearing is the most common occupational disease in the USA: about 22 million US workers are exposed to hazardous noise levels at work, and, annually, an estimated US\$242 million is spent on compensation for hearing loss disability.¹⁶

Many countries enforce general health and safety legislation that specifies maximum exposure levels and requirements for action, including noise assessments, regular

audiometric testing, protective equipment, and monitoring, which are intended to protect both workers and the public from excessive noise exposure. However, the available evidence for associations between occupational noise exposure and hearing loss is complex and its quality varies. Many studies have a lack of appropriate non-exposed controls, and longitudinal studies are scarce. Contributors to a Cochrane collaboration review¹⁷ concluded that “higher quality prevention programs, better quality of studies especially in the field of engineering controls and better implementation of legislation are needed to better prevent noise-induced hearing loss”. This Review also indicated that current efforts for hearing loss prevention focus on hearing protection rather than on noise control.

The exact level of noise exposure in industrial settings that carries risk of hearing damage is debated internationally. For example, in the UK, the Control of Noise at Work Regulations (2005)¹⁸ set levels for action at L_{Aeq8h} 80 dB (protection made available) and 85 dB (protection mandatory). A 3 year follow-up investigation of 19 UK companies that had varying degrees of compliance reported that these values were safe.¹⁹ However, studies with a longer follow-up are needed to lend support to these findings. The US Occupational Safety and Health Administration (OSHA) promotes less strict standards than do others and sets the permissible exposure limit at L_{Aeq8h} 90 dB. However, according to OSHA regulations, employers have to implement a hearing conservation programme if workers are exposed to levels higher than L_{Aeq8h} 85 dB. Although noise-induced hearing loss is well recognised in industrial settings, individuals with other occupations such as musicians^{20,21} or those working for the military,^{22,23} also contribute substantially to the overall burden of noise-induced hearing loss.

Social noise exposure

Excessive noise is often accepted as part of the recreational environment. Although occupational noise has decreased since the early 1980s, the number of young people with relevant degrees of social noise exposure has tripled in the same period.²⁴ A growing body of work is assessing the risk of hearing loss in adolescents due to personal music player use.²⁵ In one study, 66% of young adults attending nightclubs or rock concerts in the Nottingham area of England reported temporary auditory effects or tinnitus.²⁴ Prospective cohort studies like OHRKAN²⁶ are needed to conclude whether widespread exposure to loud music in adolescence increases the prevalence of hearing loss and tinnitus in older ages. Both safer products and public health campaigns are needed to reduce the risk of hearing loss from personal music player use. Noise-cancelling headphones are effective preventive measures for reducing hazards for users of personal music players.²⁷

Noise-induced hearing loss and age

Noise-induced hearing loss is determined by noise exposure and life-course events, all age groups can be

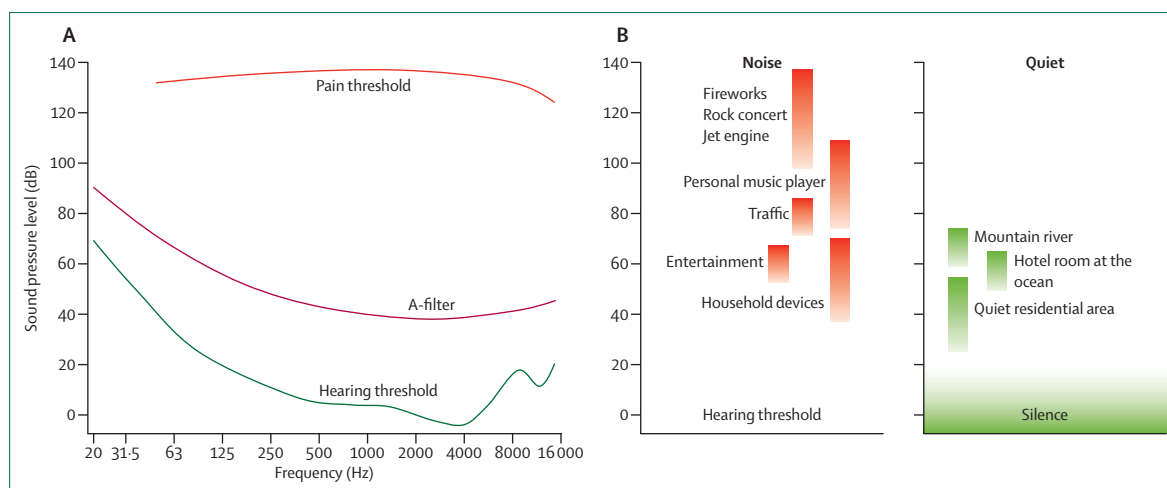


Figure 1: Sound pressure levels

(A) The sensitivity of the auditory system depends on sound frequency and sensitivity is highest between 2000 Hz and 5000 Hz (green line). The A-filter (dark red line) is a frequency-weighting of sound pressure levels that mimics the sensitivity of the auditory system (eg, low-frequency sounds contribute little to the A-weighted dB level). (B) A-weighted sound pressure levels for several environmental sounds, emphasising that whether or not a sound is perceived as noise depends largely on the context and the individual, and is only partly determined by its sound pressure levels. For example, spectators attending a rock concert might not perceive the music as noise, whereas residents in the vicinity of the venue might call it noise, even though sound pressure levels are much lower there than for inside.

affected. Exposure to different types of noise from early childhood might have cumulative effects on hearing impairment in adulthood. Evidence is increasing that early social and biological factors might affect hearing in middle age (eg, a study of patients assessed at age 45 years²⁸). Prevalence of hearing loss is highly related to age.²⁹ How noise and age interact is a major gap in the specialty's knowledge. Data suggest that pathological but sublethal changes from early noise exposure substantially increase risk of inner ear ageing and related hearing loss.^{30,31} In addition to noise, factors such as alcohol and tobacco use and hyperglycaemia are associated with age-related hearing loss. Thus, public health initiatives need to address both general health and auditory health.

Scientific advances and therapeutic strategies

In the past 5 years, several studies and advances have improved understanding of the causes and factors affecting susceptibility to noise-induced hearing loss. Noise-induced hearing loss is widely accepted to be a symptom of a complex disease that results from the interaction of genetic and environmental factors. Heritability might explain up to 50% of hearing loss variability in individuals after exposure to noise, but definitive studies are needed. Identification of susceptibility genes might help to identify the population at high risk and improve targeted hearing protection in predisposed individuals.³² Much progress has been made in the understanding of molecular mechanisms involved in hair-cell and nerve damage. Recent research from investigators using stem cells to recover the damaged sensory circuitry in the cochlea is at a very early stage, but could lead to potential therapeutic strategies.³³ Attention is increasing on the risks of combined exposure to high-level

noise and ototoxic drugs, which can affect the structures of the inner ear and the auditory nerves.^{34,35} A small but substantial number of people have hearing loss as a complication of cancer treatments such as cisplatin, which might be further exacerbated by high levels of noise (eg, in MRI scanners).

Several therapeutic avenues have been recently explored, and oral drugs to protect against noise-induced hearing loss are expected to become available in the next 10 years.¹³ Investigators have reported that oxidative stress could contribute to cochlear cell damage; antioxidant compounds, such as glutathione, have improved noise-induced hearing loss in animals and might prevent noise-induced hearing loss.^{36,37} An oral otoprotective drug, D-methionine, prevents noise-induced hearing loss in animals even when first given within hours after a noise exposure; however, only formal clinical trials will provide the data needed to assess safety and efficacy in human beings.³⁸ Clinical trials of D-methionine in the US Army, funded by the US Department of Defense, are scheduled to begin soon (NCT01345474).³⁸

Diagnosis of noise-induced hearing loss

The development of otoacoustic emission testing has been an important technological advance in audiological assessment. Otoacoustic emissions are a release of acoustic energy from the cochlea that can be recorded in the ear canal. Otoacoustic emission testing is used to identify hearing defects in newborn babies and young children. Hall and Lutman³⁹ reported that otoacoustic emission testing was twice as sensitive as was audiometry to detect a change in hearing threshold level and suggested that it could improve monitoring for noise-induced hearing loss in the workplace. A longitudinal

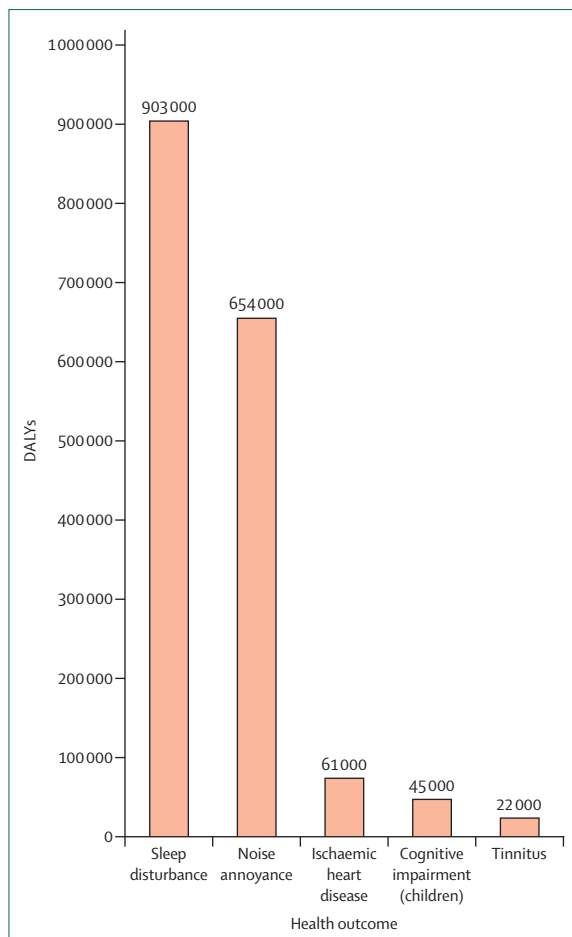


Figure 2: DALYs attributed to environmental noise exposure in Europe. According to WHO,¹⁴ more than 1 million healthy life years (DALYs) are lost annually because of environmental noise exposure in European A-member states alone. Most of these DALYs can be attributed to noise-induced sleep disturbance and annoyance. DALYs=Disability-adjusted life years.

study⁴⁰ also suggested that otoacoustic emissions could indicate noise-induced changes in the inner ear undetected by audiometric tests. Otoacoustic emissions might therefore be a superior diagnostic predictor for noise-induced hearing loss, but further longitudinal studies are needed to show whether otoacoustic emission testing can replace standard audiometry or whether the two techniques have complementary roles.¹⁹

Non-auditory health effects

Introduction

The most investigated non-auditory health endpoints for noise exposure are perceived disturbance and annoyance, cognitive impairment (mainly in children), sleep disturbance, and cardiovascular health. WHO estimated that in high-income western European countries (population about 340 million people), at least 1 million healthy life-years (disability-adjusted life-years) are lost every year because of environmental noise (figure 2).¹⁴

Annoyance

Annoyance is the most prevalent community response in a population exposed to environmental noise. Noise annoyance can result from noise interfering with daily activities, feelings, thoughts, sleep, or rest, and might be accompanied by negative responses, such as anger, displeasure, exhaustion, and by stress-related symptoms.⁴¹ In severe forms, it could be thought to affect wellbeing and health, and because of the high number of people affected, annoyance substantially contributes to the burden of disease from environmental noise (figure 2).¹⁴ Investigators have proposed standardised questions about residents' long-term annoyance in their home for use in surveys.⁴² Additionally, investigators have gathered substantial data for community annoyance in residents exposed to noise in their home, based on which exposure-response relationships were derived (eg, for wind turbines).^{4,43,44} These relations can be used in strategic or health impact assessments for estimating long-term annoyance in fairly stable situations. Although the overall community response depends on societal values and is most relevant to the guidance of policy, several personal (eg, age and noise sensitivity) and situational characteristics (eg, dwelling insulation) might affect the individual degree of annoyance.^{41,44}

Cardiovascular disease

Both short-term laboratory studies of human beings and long-term studies of animals have provided biological mechanisms and plausibility for the theory that long-term exposure to environmental noise affects the cardiovascular system and causes manifest diseases (including hypertension, ischaemic heart diseases, and stroke).⁴⁵ Acute exposure to different kinds of noise is associated with arousals of the autonomic nervous system and endocrine system.⁴⁶ Investigators have repeatedly noted that noise exposure increases systolic and diastolic blood pressure, changes heart rate, and causes the release of stress hormones (including catecholamines and glucocorticoids).⁴⁵ The general stress model is the rationale behind these reactions. Potential mechanisms are emotional stress reactions due to perceived discomfort (indirect pathway), and non-conscious physiological stress from interactions between the central auditory system and other regions of the CNS (direct pathway). The direct pathway might be the predominant mechanism in sleeping individuals, even at low noise levels.

Chronic exposure can cause an imbalance in an organism's homeostasis (allostatic load), which affects metabolism and the cardiovascular system, with increases in established cardiovascular disease risk factors such as blood pressure, blood lipid concentrations, blood viscosity, and blood glucose concentrations.^{45,47} These changes increase the risk of hypertension, arteriosclerosis, and are related to severe events, such as myocardial infarction and stroke. Studies of occupational⁴⁸⁻⁵⁰ and environmental^{7,51-53} epidemiology have shown a higher prevalence

and incidence of cardiovascular diseases and mortality in highly noise-exposed groups. The risk estimates for occupational noise at ear-damaging intensities tend to be higher than are those for environmental noise (at lower noise levels). Because of different acoustic characteristics for different noise sources (sound level, frequency spectrum, time course, sound level rise time, and psychoacoustic measures) noise levels from different noise sources cannot be merged into one indicator of decibels. Different exposure–response curves are needed for different noise sources. Meta-analyses were done to quantitatively assess the exposure–response link for transportation noise (exposure to road traffic and aircraft noise) and health effects (hypertension and ischaemic heart diseases, including myocardial infarction).^{6,54,55} The investigators derived increases in risk of between 7% and 17% per 10 dB increase in equivalent noise level L_{Aeq} (figure 3). Their results have been adjusted for known risk factors such as age, sex, socioeconomic status, smoking, body-mass index, and others. The researchers identified sex and age as effect modifiers. Studies of the combined effects of noise and air pollution showed largely independent effects,^{7,51–53} which can be explained by different mechanisms of how both exposures can affect health (cognitive and autonomic stress response vs inflammatory processes).

Cognitive performance

WHO estimate that about 45 000 disability-adjusted life-years are lost every year in high-income western European countries for children aged 7–19 years because of environmental noise exposure (figure 2).¹⁴ Postulated mechanisms for noise effects on children's cognition include communication difficulties, impaired attention, increased arousal, learned helplessness, frustration, noise annoyance, and consequences of sleep disturbance on performance.^{3,56} Investigators have also suggested psychological stress responses as a mechanism because children are poor at appraising threats from stressors and have less well developed coping strategies than do adults.³ Areas with high levels of environmental noise are often socially deprived, and children from areas with high social deprivation do worse on tests of cognition than do children not exposed to social deprivation. Therefore, measures of socioeconomic position should be taken into account in the assessment of associations between noise exposure and health and cognition.

More than 20 studies have shown environmental noise exposure has a negative effect on children's learning outcomes and cognitive performance,⁵⁷ and that children with chronic aircraft, road traffic, or rail noise exposure at school have poorer reading ability, memory, and performance on national standardised tests than do children who are not exposed to noise at school.^{58–60} Investigators have examined exposure–effect links between noise exposure and cognition to identify the exposure level at which noise effects begin.^{61,62} The RANCH study of 2844 children

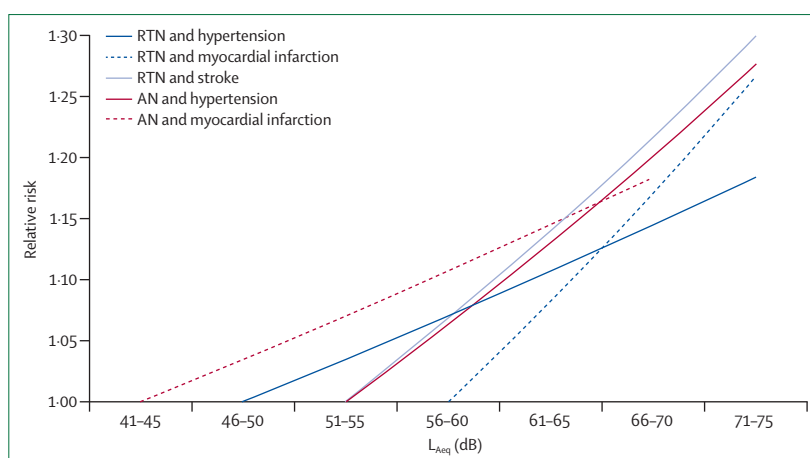


Figure 3: Exposure–response curves of road and aircraft noise and cardiovascular endpoints RTN and hypertension (24 studies, noise indicator L_{Aeq16h}); RTN and myocardial infarction (five studies, noise indicator L_{Aeq16h}); RTN and stroke (one study, noise indicator L_{Dn}); AN and hypertension (five studies, noise indicator L_{Dn}); and AN and MI (one study, noise indicator L_{Dn}). RTN=road traffic noise. AN=aircraft noise.

aged 9–10 years attending 89 schools around Heathrow (London, UK), Schiphol (Amsterdam, the Netherlands), and Madrid-Barajas (Spain) airports showed a linear exposure–effect relation between aircraft noise exposure at school and a child's reading comprehension and recognition memory after adjusting for a range of socioeconomic factors.^{61,62} A L_{Aeq} 5 dB increase in aircraft noise exposure was associated with a 2 month delay in reading age in children in the UK and a 1 month delay in those in the Netherlands. These linear associations suggest that there is no threshold for effects and any reduction in noise level at school should improve a child's cognition.

WHO Community Noise Guidelines⁶³ suggest that the background sound pressure level should not exceed L_{Aeq} 35 dB during teaching sessions. Intervention studies and natural experiments have shown that reductions in noise exposure from insulation or the closure of airports are associated with improvements in cognition, suggesting that noise reduction can eliminate noise effects on cognition.^{58,59}

Sleep disturbance

Sleep disturbance is thought to be the most deleterious non-auditory effect of environmental noise exposure (figure 2), because undisturbed sleep of a sufficient length is needed for daytime alertness and performance, quality of life, and health.^{5,14} Human beings perceive, evaluate, and react to environmental sounds, even while asleep.⁶⁴ Maximum sound pressure levels as low as L_{Amax} 33 dB can induce physiological reactions during sleep including autonomic, motor, and cortical arousals (eg, tachycardia, body movements, and awakenings).^{5,65} Whether noise will induce arousals depends not only on the number of noise events and their acoustical properties,² but also on situational moderators (such as momentary sleep stage⁶⁶) and individual noise susceptibility.⁶⁴ Elderly people,

children, shift-workers, and people with a pre-existing (sleep) disorder are thought of as at-risk groups for noise-induced sleep disturbance.⁵ Repeated noise-induced arousals interfere with sleep quality through changes in sleep structure, which include delayed sleep onset and early awakenings, reduced deep (slow-wave) and rapid eye movement sleep, and an increase in time spent awake and in superficial sleep stages.^{2,66} However, these effects are not specific for noise,⁶⁷ and generally less severe than those in clinical sleep disorders such as obstructive sleep apnoea.⁶⁸ Short-term effects of noise-induced sleep disturbance include impaired mood, subjectively and objectively increased daytime sleepiness, and impaired cognitive performance.^{69,70} Results of epidemiological studies indicate that nocturnal noise exposure might be more relevant for the creation of long-term health outcomes such as cardiovascular disease than is daytime noise exposure,⁷¹ probably because of repeated autonomic arousals that have been shown to habituate to a much lesser degree to noise than other—eg, cortical—arousals.² In 2009, WHO published the Night Noise Guidelines for Europe, an expert consensus mapping four noise exposure groups to negative health outcomes ranging from no substantial biological effects to increased risk of cardiovascular disease (panel 2).⁷² WHO regards average nocturnal noise levels of less than $L_{Aeq,night,outside}$ 55 dB to be an interim goal and 40 dB a long-term goal for the prevention of noise-induced health effects.

Hospital noise

Although most environmental noise guidelines list hospitals as noise-sensitive facilities, studies of external (eg, traffic) noise effects on hospital environments are

very rare. However, research on the understanding and prevention of indoor hospital noise effects on patients and staff has been increasing. An extensive meta-analysis of hospital sound levels indicated that hospital noise has increased by about L_{Aeq} 10 dB since the 1960s.⁷³ Noise levels in hospitals are now typically more than L_{Aeq} 15–20 dB higher than those recommended by WHO.⁶³ Hospital noise could therefore be an increasing threat to patient rehabilitation and staff performance.

The sound environment in hospitals, especially in intensive care units, can be characterised by irregularly occurring noises from sources such as medical devices (eg, alarms), telephones or pagers, conversations, door sounds, and nursing activities. Such noise worsens patient health outcomes through factors such as increased cardiovascular stress, longer healing times, increases in doses of pain-relief drugs, and increased patient readmission rates.⁷⁴ Neonates, long-term patients, and elderly people are thought to be particularly at-risk to the effects of noise. Sleep disruption is the most common noise-related patient complaint.^{75,76} Researchers of a sleep laboratory study developed arousal probability curves for 14 noises typically encountered in hospitals.⁷⁷ The most disturbing noises were intravenous pump alarms and telephone rings, which are intentionally designed to alert staff members.

Evidence of negative effects of noise on hospital staff is increasing, particularly for nurses, with noise-induced stress linked to burnout, diminished wellbeing, and reduced work performance.⁷⁸ Substantial proportions of staff report annoyance, irritation, fatigue, and tension headaches, which they assign to the noisy workplace environment.⁷⁹ Noise also affects speech intelligibility and could therefore lead to misunderstandings that result in medical errors.^{73,78}

Improved acoustics such as sound-absorbing ceilings are relevant factors for staff performance and reduced work strain,⁸⁰ and have been associated with a decrease in rates of patients being readmitted to hospital.⁷⁴ Reduction of background sound levels and ringtone volume of telephones is recommended to improve patient recovery at night.⁷⁷ Researchers noted promise in reductions of rates of false alarms of medical devices and modification of staff behaviour to avoid unnecessary noise.⁸¹

Conclusions

Hearing loss caused by occupational or recreational noise exposure is highly prevalent and constitutes a public health threat needing preventive and therapeutic strategies. In this Review, we emphasise that non-auditory health effects of environmental noise are manifold, serious and, because of the widespread exposure, very prevalent. These factors stress the need to regulate and reduce environmental noise exposure (ideally at the source) and to enforce exposure limits to mitigate negative health consequences of chronic exposure to environmental noise. Educational campaigns for children and adults can promote both noise-avoiding and

Panel 2: WHO definitions of health effects of different average night noise levels⁷²

Below 30 dB $L_{Aeq,night,outside}$

Although individual sensitivities and circumstances may differ, it appears that up to this level no substantial biological effects are observed. $L_{Aeq,night,outside}$ of 30 dB is equivalent to the no observed effect level (NOEL) for night noise.

30–40 dB $L_{Aeq,night,outside}$

A number of effects on sleep are observed from this range: body movements, awakening, self-reported sleep disturbance, arousals. The intensity of the effect depends on the nature of the source and the number of events. Vulnerable groups (for example children, the chronically ill, and elderly people) are more susceptible. However, even in the worst cases the effects seem modest. $L_{Aeq,night,outside}$ of 40 dB is equivalent to the lowest observed adverse effect level (LOAEL) for night noise.

40–55 dB $L_{Aeq,night,outside}$

Adverse health effects are observed among the exposed population. Many people have to adapt their lives to cope with the noise at night. Vulnerable groups are more severely affected.

Above 55 dB $L_{Aeq,night,outside}$

The situation is considered increasingly dangerous for public health. Adverse health effects occur frequently, a sizeable proportion of the population is highly annoyed and sleep-disturbed. There is evidence that the risk of cardiovascular disease increases.

noise-reducing behaviours, and thus, mitigate negative health consequences. Efforts to reduce noise exposure will eventually be rewarded by lower amounts of annoyance, improved learning environments for children, improved sleep, lower prevalence of cardiovascular disease, and, in the case of noise exposure in hospitals, improved patient outcomes and shorter hospital stays.

Contributors

MBA wrote the abstract, the section about noise effects on sleep, and the conclusion; did a literature search for the section about noise effects on sleep; contributed panel 2; and helped to design figure 1. WB wrote the introduction to the section about non-auditory health effects; did the literature search for and wrote the section on cardiovascular noise effects; and contributed figures 2 and 3. AD did the literature search for and wrote the chapter on auditory effects of noise on health. MBR did the literature search for and wrote the section on the effects of hospital noise. CC did the literature search for and wrote the section on the effects of noise on cognitive performance. SJ did the literature search for and wrote the section on community effects of noise. SS wrote the introduction. All authors read and revised the Review.

Conflicts of interest

We declare that we have no conflicts of interest.

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Federal Aviation
Administration

REPORT TO CONGRESS

Nonmilitary Helicopter Urban Noise Study

Washington, DC 20591

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Report of the
Federal Aviation Administration
to the United States Congress
Pursuant to Section 747 of the
Wendell H. Ford Aviation
Investment and Reform Act for
the 21st Century (AIR-21)

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LIST OF ABBREVIATIONS

AGL	Above Ground Level
ANCA	Airport Noise and Capacity Act
ANSI	American National Standards Institute
ASEL	A-weighted Sound Exposure Level
ASNA	Aviation Safety and Noise Abatement Act
AStar	Eurocopter (former Aerospatiale) helicopter
ATC	Air Traffic Control
BVI	Blade Vortex Interaction
B206	Bell 206 Helicopter
B&K	Brüel & Kjær
CAEP	Committee on Aviation Environmental Protection
CFR	Code of Federal Regulations
CPA	Closest point of approach
dB	Decibel
dGPS	Differential Global Positioning System
DAT	Digital Audio Tape
DNL	Day-Night Sound Level
DOT	Department of Transportation
EC	Eurocopter Corporation
EGA	Excess Ground Attenuation
EMS	Emergency Medical Services
ENG	Electronic News Gathering
EPA	Environmental Protection Agency
EPNL	Effective Perceived Noise Level
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FICAN	Federal Interagency Committee on Aviation Noise
GPS	Global Positioning System
HNM	Helicopter Noise Model
HP	Hewlett Packard
HSI	High Speed Impulsive noise
ICAO	International Civil Aviation Organization
IFR	Instrument Flight Rules
INM	Integrated Noise Model
INMrv	INM Research Version
LAAS	Local Area Augmentation System
LEQ	Equivalent Sound Level
Lmax	Maximum A-Weighted Sound Level
LSP	Liberty State Park, New Jersey
MD	McDonnell Douglas
MDHI	McDonnell Douglas Helicopters Incorporated
NAS	National Airspace System
NASA	National Aeronautics and Space Administration

NEPA	National Environmental Policy Act
NOTAR	No Tail Rotor
NRTC	National Rotorcraft Technology Center
NYC	New York City
PNLT	Perceived Noise Level Tone Corrected
R&D	Research and Development
RITA	Rotorcraft Industry Technology Association
SAE	Society of Automotive Engineers
SEL	Sound Exposure Level
SIL	Speech Interference Level
SPL	Sound Pressure Level
SS	Sight Seeing
S-76	Sikorsky Model S-76 Helicopter
TSPI	Time Space Position Information
UNC	Uncontrolled Condition
UTC	Universal Coordinated Time
VFR	Visual Flight Rules
VOR	Very High Frequency Omni-directional Range
VTOL	Vertical TakeOff and Landing
vTSPI	Video Time Space Position Information
WAAS	Wide Area Augmentation System
WHO	World Health Organization

1.0 Executive Summary

In response to public concerns about nonmilitary helicopter noise impact on densely populated communities, the United States Congress directed the Secretary of Transportation to investigate and develop recommendations on reducing helicopter noise effects. Legislative guidance was developed and specified in the FAA authorization act entitled “Wendell H. Ford Aviation Investment and Reform Act for the 21st Century” (Public Law 106-181) under Section 747 - Nonmilitary Helicopter Noise. The Federal Aviation Administration (FAA) carried out this study on behalf of the Secretary.

The FAA outlined a three-step approach to perform this study. The first step of the FAA approach was a comprehensive literature review of current noise effects on human beings. The review identified several socio-acoustic concerns addressed in the report. These were:

- Noise-induced hearing impairment;
- Interference with speech communication;
- Effects of noise on performance;
- Sleep disturbance;
- Cardiovascular and physiological effects;
- Mental health effects; and
- Effects of noise on residential behavior and annoyance.

Second, FAA solicited public input through Federal Register notices and two public workshops.¹ This generated numerous comments from private citizens, elected officials, civic group representatives, and the helicopter industry. The comments were categorized into operational and non-operational issues. The operational issues most frequently expressed were:

- Minimum altitude for overflight and hover;
- Operational routes & routing design guidelines;
- Hover duration time;
- Retirement of noisiest helicopters;
- Visible identification markings;
- Frequency of helicopter operations (number of flights);
- Time frame of helicopter operations (hours of operation);
- Heliports/airports operations (i.e., ground run-up duration);
- Noise abatement procedures;
- Noise certification limit stringency; and
- Implementation of noise reduction technology (i.e., helicopter “hushkits”).

The nonoperational issues most frequently expressed were:

- Effectiveness of voluntary “Fly Neighborly” program;
- Redundancy of Electronic News Gathering (ENG) flights;

¹ 65 FR 39220 (June 23, 2000) and 65 FR 49630 (August 14, 2000).

- Acceptance of public service helicopter operations; i.e., law enforcement, emergency medical services (EMS), and fire fighters;
- Visual Flight Rule (VFR)/Instrument Flight Rule (IFR) Air Traffic Control (ATC) operations access for helicopters;
- Empowerment of local municipalities with airspace control;
- Accounting for military helicopter impact;
- Need for a socio-acoustic (psychoacoustic) study relating medical and health effects;
- Tracking of helicopter traffic growth and noise measures to quantify impact of noise sensitive community sites (parks, hospitals, neighborhoods, etc);
- Utilization of differential Global Positioning Systems (dGPS) approach/departure for noise abatement operations; and
- Insensitivity of A-weighted measurements in accounting for low-frequency noise impact of helicopters.

The third part of the FAA approach involved the acquisition of helicopter noise measurements to quantify noise levels in a densely populated metropolitan area. This was done by taking sets of noise measurements within the urban center of New York City. The FAA's preliminary *in-situ* noise measurements showed that increasing operational altitude does reduce noise from helicopters (see Section 7.2 and Appendix G), corroborates operational noise measurements reported in the New York City Master Plan Report, and supports the industry's voluntary operational guidance to "fly higher" altitudes.

Conclusions and Recommendations:

The FAA offers the following conclusions and recommendations based upon the study:

- Additional development of models for characterizing the human response to helicopter noise should be pursued. Civil helicopter annoyance assessments utilize the same acoustic methodology adopted for airplanes with no distinction for a helicopter's unique noise character. As a result, the annoyance of unaccustomed, "impulsive" helicopter noise has not been fully substantiated by a well-correlated metric. Comments from both the helicopter industry and the public strongly recommended that further socio-acoustic investigations be pursued. Additional civil helicopter annoyance studies may help refine current noise measurement analysis methodology that would lead to improved noise mitigation effectiveness. The Federal Interagency Committee on Aviation Noise (FICAN) should charter a technical study to focus on low frequency noise metric to evaluate helicopter annoyance, including performance of multi-year socio-acoustic (noise) studies to correlate helicopter annoyance and health effects of urban helicopter operations. In the meantime, the FAA will continue to rely upon the widely accepted Day-Night Sound Level (DNL) as its primary noise descriptor for airport and heliport land use planning. The FAA will also continue the use of supplemental noise descriptors for evaluation of helicopter noise issues.

To date, this recommendation has been incorporated into the Rotorcraft Research and Development Initiative for Vision 100 – Century of Aviation Reauthorization Act (Public Law 108-176) under Sec. 711. For Sec. 711, NASA, FAA, and the rotorcraft industry

defined a 10-year rotorcraft research and development (R&D) plan that included the study of Psychoacoustics. The research proposes to determine human annoyance levels due to helicopter noise, both in its native condition and synthetically modified. Studies would be conducted to uncover neglected characteristics of noise and develop a refined metric more representative of the true human response.

- Further operational alternatives that mitigate noise should be explored. A number of operational alternatives, proposed by the public and industry, have the potential to mitigate urban nonmilitary helicopter noise and preserve the safe and efficient flow of air traffic. In particular, the FAA found:
 - Noise reduction benefits can be achieved with higher altitude flight. With more conclusive demonstrations addressing safety, such noise mitigation approaches could be integrated within the ATC design planning in specific urban airspaces;
 - Optimal helicopter route planning to avoid noise sensitive areas will require comprehensive evaluation for each specific region of concern;
 - The promotion of noise abatement procedures should be pursued on two fronts – with helicopter pilots and air traffic control personnel. The FAA will continue training ATC personnel to increase awareness of noise abatement procedures that best mitigate noise over communities; and
 - The use of advanced technologies, such as dGPS, aids in helicopter approach and departure procedures do show to be beneficial for noise abatement operations. Preliminary dGPS/noise research sponsored by the National Rotorcraft Technology Center (NRTC)/ Rotorcraft Industry Technology Association (RITA) has indicated promising noise reductions using more precise procedures.

The implementation of any of these alternatives would require comprehensive evaluation, and demonstration where appropriate on a case-by-case basis, in accordance with all applicable FAA orders and regulations. Also, careful consideration would have to be taken of any ATC changes to an urban segment of the National Airspace System (NAS) that could impact the heavily utilized and highly burdened large commercial transport sector. Finally, funding levels required to develop and explore the technology and procedures listed above will be significant.

Similarly under the 2004 Vision 100 Rotorcraft R&D plan, operational noise reduction studies were defined to aid in the noise mitigation of legacy helicopters, such as the Sikorsky S-76 and Bell helicopter products. The expansion of noise abatement flight techniques would be tested for consistency with safety and passenger comfort for several classes of rotorcraft: light, medium and advanced configurations. At the R&D program conclusion, the compilation of noise mitigation technology and abatement operational procedures is to be integrated and demonstrated in a selected single flight vehicle for noise and system validation.

Also, under the Vision 100 plan, there is the “Zero ceiling/Zero visibility” operational goal that addresses advances in navigational system such as wide area augmentation system (WAAS) and local area augmentation system (LAAS) and moving to a comprehensive differential global position system (dGPS) precision navigation capability. Such research applications have proven beneficial to noise mitigation and are expected to enhance the noise abatement operational procedures development.

- Emergency helicopter service should be exempt from restrictions. A key outcome of the FAA-hosted workshops was the mutual agreement among public and industry participants that emergency helicopter service (air medical, law enforcement, fire-fighting, public services, etc.) should be exempted from any proposed limitations or restrictions considered by Congress following this study. These services are time-critical and provide a “noise-excusable” public service.
- Helicopter operators and communities should develop voluntary agreements to mitigate helicopter noise. Federal, state, and local governments encourage voluntary mutual cooperation by helicopter operators, the community, and local authorities in the establishment of a “noise response” process. Federal, state and local governments establish business incentives that encourage the “pooling” of helicopter operations, especially for redundant ENG operations.

2.0 Introduction

Helicopters serve specialized functions and important roles in the Nation's commerce and transportation system. Helicopters are a versatile and valued segment of the multimodal transportation infrastructure. The helicopter's unique hovering, vertical takeoff and landing capabilities fulfill a broad range of missions. Helicopters support vital roles including air ambulance services; Federal, state, and local law enforcement patrol; flexible corporate shuttle services; news coverage; parcel distribution; aerial tourism; firefighting; and heavy lift capability.

Over the past several decades, significant technological advances have been made in aviation noise reduction. However, research and development activities have succeeded primarily in reducing the noise levels associated with commercial transport jet airplanes. Much of the scientific investments for rotorcraft has benefited in physical understanding and phenomenon modeling, such as Blade Vortex Interaction (BVI) and High Speed Impulsive (HSI) noise during approach and high speed cruise, respectively. A Congressional Report on "Quiet Aircraft Technology for Propeller-Driven Airplanes and Rotorcraft" identified the technical status of the United States Research and Technology (R&D) for the rotorcraft sector. The 1996 report concluded that, in general, quiet rotorcraft technology was immature and too slow to market.

A notable "low noise" technological success was achieved with the non-conventional NOTAR (NO TAIL Rotor) anti-torque design by MDHI (formerly McDonnell Douglas Helicopters Incorporated). Yet, a major challenge continues to exist in balancing cost to implement low noise technology within an overall affordable market cost to users and operators.

The FAA and the International Civil Aviation Organization (ICAO) continue to assess and revise rotorcraft noise certification requirements for increased noise stringency that are based upon reasonably achievable noise reduction technology. The noise certification process establishes reference conditions for the manufacturer to demonstrate that a design complies with the standard.

In the New York City metropolitan area, there has been an ongoing dispute over helicopter noise. Communities there are concerned that helicopter noise impacts their quality of life. Consequently, New York City launched a comprehensive master plan analysis that studied: 1) the City's heliport "needs", 2) heliport guidelines taking into consideration the environment and socioeconomic issues of the community, 3) future heliport planning, 4) present and future airspace integration issues, and 5) proposed financial planning and implementation schedule.²

2.1 Mandate

In response to public concerns about nonmilitary helicopter noise impact on densely populated communities, the U.S. Congress directed the Secretary of Transportation to investigate the effects of helicopter noise and to develop recommendations for reducing the effects.

² Edwards and Kelcey Engineering, Inc., "Heliport and Helicopter Master Plan for the City of New York," Final Report, March 1999.

This mandate was specified in Section 747 (Public Law 106-181) of the FAA authorization act entitled “Wendell H. Ford Aviation Investment and Reform Act for the 21st Century.” It states:

Section 747. - Nonmilitary Helicopter Noise

(a) IN GENERAL- *The Secretary shall conduct a study - (1) on the effects of nonmilitary helicopter noise on individuals in densely populated areas in the continental United States; and (2) to develop recommendations for the reduction of the effects of nonmilitary helicopter noise.*

(b) FOCUS- *In conducting the study, the Secretary shall focus on air traffic control procedures to address helicopter noise problems and shall take into account the needs of law enforcement.*

(c) CONSIDERATION OF VIEWS- *In conducting the study, the Secretary shall consider the views of representatives of the helicopter industry and organizations with an interest in reducing nonmilitary helicopter noise.*

(d) REPORT- *Not later than 1 year after the date of the enactment of this Act, the Secretary shall transmit to Congress a report on the results of the study conducted under this section.*

FAA carried out this study on behalf of the Secretary of Transportation.

2.2 Background

New York City has spawned the most extensive utilization of helicopter services of any city in the world. The New York City’s heliports have over 150,000 takeoffs and landings annually. There have also been increasing community noise complaints leading to the formation of anti-helicopter interest groups. In response, the City of New York initiated and prepared a comprehensive assessment of the City’s heliport infrastructure and related helicopter activities to better balance local helicopter industry’s operational needs and the affected communities’ quality of life. Completed in 1999, the City’s master plan outlined a comprehensive framework of developmental planning, review of commerce, economics, and environmental issues and proposed long-term planning guidelines.³ In addition, New York City has established a policy not to support air tour activities.⁴ However, state and local governments do not have the authority to regulate aircraft flight operations. Such authorities lie with the FAA and must be addressed in accordance with all applicable FAA orders and regulations. To minimize their noise liability, state and local governments, acting as airport proprietors, have authority to adopt reasonable nondiscriminatory restrictions on access that do not impose on undue burden on interstate commerce.

³ Edwards and Kelcey Engineering, Inc.

⁴ R. Grotell, Docket Comment #76: The City of New York: Office of the Mayor,” October 20, 2000.

2.3 FAA Study Process

The FAA used three methods to gather data to complete this study. The methods included: (1) solicit comments via Federal Register notice(s) and at public workshop(s), (2) review current noise effects literature, and (3) measure helicopter source noise in a densely populated metropolitan area.

The FAA hosted two public workshops and opened a docket for submission of written comments after soliciting information in the Federal Register. The comment period was extended to provide sufficient time for public responses.

2.4 Report Format

This report presents the urban helicopter noise study information that the FAA was required to prepare pursuant to Section 747 of the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century.

Section 1 is the Executive Summary.

Section 2 presents an introduction including the general background on the circumstances that led to this legislative mandate. It also outlines the approach implemented by the FAA to perform the study; i.e., seek public input, literature review, and urban source noise measurements.

Section 3 presents the current state of scientific research on noise effects on individuals based on past socio-acoustic study findings. Where appropriate, it relates the criteria to aviation noise and more specifically helicopter noise.

Section 4 is a compilation of the helicopter noise reduction comments offered by the public and helicopter industry. The information is summarized and presented as an issues list with a synopsis of responses.

Section 5 presents the ATC procedures and regulations that support safe helicopter operations. Specific helicopter noise issues that relate to ATC operations are discussed. The needs of law enforcement and other emergency services are addressed.

Section 6 takes into consideration the views expressed by the public and industry. It offers the FAA's response to each of the issues identified.

Section 7 presents the FAA sponsored helicopter source noise measurements recorded in a densely populated metropolitan urban area. This noise data consists of a limited sample of *in-situ* noise measurements. In addition, a technical assessment of the noise-altitude sensitivity for a broad range of helicopters is discussed.

Section 8 summarizes the conclusions and recommendations for helicopter noise reduction on individuals in densely populated (urban) areas.

3.0 Noise Effects on Individuals

In this section, current scientific research concerning noise effects on individuals has been compiled and summarized.

3.1 Health Effects - Introduction

In a recent report, the World Health Organization (WHO) offers guidance on the potential health effects due to community noise exposure. The report categorizes the effects as follows:

- Noise-induced hearing impairment;
- Interference with speech communication;
- Effects of noise on performance;
- Sleep disturbance;
- Cardiovascular and physiological effects;
- Mental health effects; and
- Effects of noise on residential behavior and annoyance.⁵

The WHO study considered both environmental and occupational settings. Noise-induced hearing impairment is normally associated with occupational settings. Only when the 24-hour equivalent level exceeds 70 dB does the threat of environmental noise-induced hearing impairment arise.⁶ Helicopters rarely produce 24-hour equivalent levels that exceed 70 dB. In fact, such worst case, high noise levels only occur near very busy military airfields operating heavy lift helicopters and frequent flights. Thus, noise-induced hearing impairment due to nonmilitary helicopters operations in urban environments is an unlikely condition.

3.2 Noise Effects on Communications and Performance

The WHO, based upon a study by Lazarus (1998), suggests that “noise interference with speech comprehension results in a large number of personal disabilities, handicaps and behavioral changes.” The report goes on to say: “Problems with concentration, fatigue, uncertainty and lack of self-confidence, irritation, misunderstandings, decreased working capacity, problems in human relations, and a number of stress reactions have all been identified. Particularly vulnerable to these types of effects are the hearing impaired, the elderly, children in the process of language and reading acquisition, and individuals who are not familiar with the spoken language.”

Nearly all information on this topic relates to the workplace or the classroom setting. The FICAN position on research in effects of aircraft noise on classroom learning states: “Research on the effects of aircraft noise on children’s learning suggests that aircraft noise can interfere with learning in the following areas: reading, motivation, language and speech acquisition, and memory.” No such data exist in other environmental noise settings. WHO (2000) states: “However, there are no published studies on whether environmental noise at home also impairs cognitive performance in adults.”⁷ Thus, at the present time, little can be said of environmental noise effects on communications and performance except as it relates to the classroom setting.

⁵ WHO 2000 - “Guidelines for Community Noise,” edited by Berglund, B., Lindvall, T., Schwela, D., and Goh, K., World Health Organization/Ministry of the Environment, 2000.

⁶ WHO 2000.

⁷ WHO 2000.

Since at least the 1970s, research results have shown that environmental noise—primarily aircraft or road traffic—can adversely affect classroom learning.^{8,9,10} Recent work near Heathrow airport and near the new and old Munich airports show similar results.^{11,12,13,14} These studies treat the entire population of students in a cohort group as one single population. The study results generally show small but statistically significant effects. Masser (1970) showed larger effects by splitting the cohort groups into three sub-groups- the high achievers, the low achievers, and a middle group.¹⁵ His studies showed that it was primarily the low achievers that were adversely affected by environmental noise. There was little effect from noise on the middle or high achiever groups. Thus, the small effects found in other studies maybe the result that mainly the low achievers are adversely affected but less discriminating within the unaffected majority of the population.

While the general effects of noise on learning have been demonstrated, there are also sub-groups of students that may be more affected than others. Students with hearing impairments, students for which English is a second language, music classes, and foreign language classes are all thought to be particularly susceptible to extraneous noise.^{16,17}

To avoid the adverse effects of noise in classrooms, WHO (2000) recommends an indoor equivalent level in classrooms of 35 dB.¹⁸ Similarly, a draft American National Standard that is being developed primarily with the noise from heating and ventilating equipment in mind also recommends an indoor classroom equivalent level of 35 dB.¹⁹ With respect to helicopter noise in urban areas, it can be expected that, where flights are frequent, the indoor equivalent level from

⁸ S. Cohen, D.A. Glass, and J.E. Singer, 1973, "Apartment Noise, Auditory Discrimination, and Reading Ability in Children," *J. of Experimental Social Psychology*, 9, 407-422.

⁹ A. Bronzaft, and D. McCarthy, 1975, "The effects of elevated train noise on reading ability," *Environment and Behavior*, 7, 517-527.

¹⁰ K.B. Green, 1980, "The Effects of Community Noise Exposure on the Reading and Hearing Ability of Brooklyn and Queens School Children," Ph. D. Thesis, Program in Environmental Health Sciences, Faculty of the Graduate School, New York University, New York, NY.

¹¹ S. Hygge, G.W. Evans, and M. Bullinger, 1996, "The Munich Airport noise study: cognitive effects on children from before to after the change over the airports," *Inter-Noise 96 Proceedings*, 2189-2194, Liverpool, England.

¹² S. Hygge, and G.W. Evans, 2000, "The Munich Airport noise study—Effects of chronic aircraft noise on children's perception and cognition," *Inter-Noise 2000 Proceedings*, in publication, Nice, France.

¹³ S. Standfeld, M. Haines, J. Head, B. Berry, M. Jiggins, S. Brentnall, and R. Rhiannon, 2000, "Aircraft noise at school and child perform and health: Initial results from the west London schools study," *Inter-Noise 2000 Proceedings*, in publication, Nice, France.

¹⁴ P. Lercher, G. Brauchle, W. Kofler, U. Widmann, and M. Meis, 2000, "The assessment of noise annoyance in schoolchildren and their mothers," *Inter-Noise 2000*, in publication, Nice, France.

¹⁵ A. Masser, circa 1970, Private communications with P. Schomer re Highline School District vrs Sea-Tac Airport, School System Psychologist, Highline School District, Highline, WA.

¹⁶ H. Lazarus, 1998, Noise and Communication: The present state. In N.L. Carter and R.F.S. Job (Eds.) Noise as a Public Health Problem, Vol. 1, pp. 157-162, Noise Effects '98 PTY Ltd., Sidney, Australia.

¹⁷ WHO 2000.

¹⁸ WHO 2000.

¹⁹ ANSI, 2000, American National Standard Quantities and Procedures for Description and Measurement of Environmental Sound—Part 6: Methods for Measurement of Awakenings Associated with Noise Events, ANSI S12.9-1996—Part 6, Draft—to be circulated for 30-day review prior to final adoption, American National Standards Institute (ANSI), New York, NY.

helicopter noise may exceed 35 dB. It is also highly probable that other urban noise sources, such as street traffic and subway trains, would exceed this threshold more frequently than helicopter operations.

3.3 *Sleep Disturbance*

The effects of noise on sleep disturbance remain the subject of much debate.^{20,21} Studies performed in laboratories generally show effects of noise such as awakening at relatively low noise levels. However, the laboratory subject is in unfamiliar surroundings and connected to probes. In contrast, field studies near major airports found that behavioral awakenings occur only when the sound levels of individual events get very loud. Based on over 10,000 subject-nights in field studies, the percent of awakenings, P, is given by American National Standards Institute (ANSI) 2000:

$$P = 0.13 \text{ ASEL} - 6.64 \quad (1)$$

where A-weighted Sound Exposure Level (ASEL) is in decibels.²² Equation 1 suggests that there is no behavioral awakenings until the indoor sound exposure level exceed 51 dB. At 60 dB indoors, there is the probability that 1 percent will be awakened.

To further point out the difference between laboratory and field results in this area, Figure 3-1 shows separate regression lines fit to laboratory and field data for behavioral awakenings.²³ It is clear that the laboratory data and the *in-situ* data are not measuring the same effects. Most would agree that the field data represent what is actually happening to people in their homes while the laboratory data must be confounded by other variables such as adaptation, the presence of probes connected to the subject, unfamiliarity with the noise, and unfamiliarity with the surroundings. Nevertheless, the WHO (2000) has chosen to concentrate on the laboratory data and largely ignore the field data.

The FAA supports the FICAN* recommendation of a new dose-response curve for predicting awakening, based on field data²⁴. The FICAN took the conservative position that, because the adopted curve represents the upper limit of the field data, it should be interpreted as predicting the “maximum percent of the exposed population expected to be behaviorally awakened” or the “maximum % awakened” (see Figure 3-2).

* FICAN - Federal Interagency Committee on Aviation Noise was formed in 1993 to provide forums for debate over future research needs to better understand, predict and control the effects of aviation noise, and to encourage new technical development efforts. The Department of Defense (DOD), the Federal Aviation Administration (FAA) and the National Aeronautics and Space Administration (NASA) are the primary agencies responsible for addressing aviation noise impacts through general R&D activities.

²⁰ K. Pearsons, D. Barber, B. Tabachnick, and S. Fidell, 1995, Analysis of the predictability of noise-induced sleep disturbance,” *Journal of the Acoustical Society of America*, **97**, 331-338.

²¹ S. Fidell, K. Pearsons, R. Howe, L. Silvati, and D. Barber, 1995, “Field study of noise-induced sleep disturbance,” *Journal of the Acoustical Society of America*, **98**, 1025-1033.

²² ANSI 2000.

²³ ANSI 2000.

²⁴ “Effects of Aviation Noise on Awakenings from Sleep,” Federal Interagency Committee on Aviation Noise, June 1997.

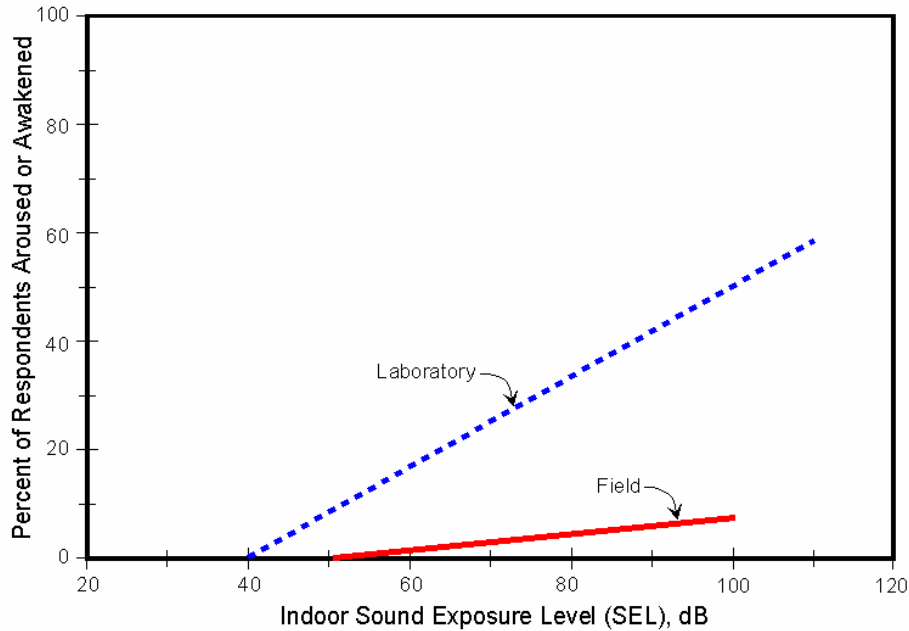


Figure 3-1. Behavioral awakening results: laboratory and field studies (ANSI 2000)

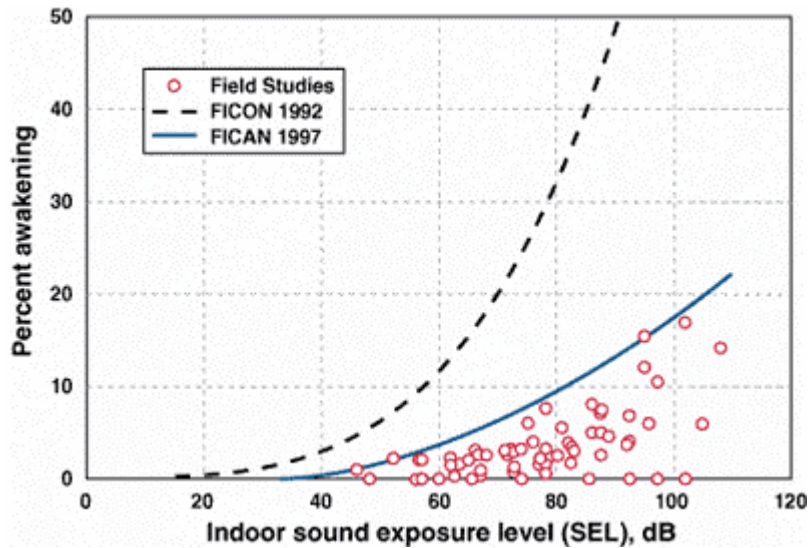


Figure 3-2. FICAN Recommended Sleep Disturbance Dose-Response Relationship

3.4 Cardiovascular and Other Physiological Effects

The WHO states: “The overall conclusion is that cardiovascular effects are associated with long-term exposure to 24-hour equivalent level values in the range of 65-70 dB or more, for both air- and road-traffic noise. However, the associations are weak...”²⁵ Reporting on results from the Health Council of the Netherlands, Passchier-Vermeer gives a 24-hour equivalent level of 70 dB as the “observation threshold of an effect for which the causal relationship with noise exposure is

²⁵ WHO 2000.

judged to be sufficient.”²⁶ The term “observation threshold” is not defined but one can assume that it represents a small fraction of the total population. In any case, urban helicopter noise will not normally exceed a 24-hour equivalent level of 65 to 70 dB. These types of levels can be found only near the busiest of military airfields. Thus, one can conclude that urban helicopter noise does not represent a threat with respect to cardiovascular and other physiological effects.

3.5 Annoyance - Introduction

The assessment of helicopter noise has been the subject of much study over the past 30 years. Most NATO countries use the ASEL to assess helicopter noise. An alternative measure is the Effective Perceived Noise Level (EPNL). When using ASEL, the noise events over a period of time are combined into an equivalent level (LEQ). For daytime flights, Fields and Powell (1987) demonstrated a strong relationship between average LEQ and average annoyance over the range of 1 to 32 flights per 9 hours. In the Fields and Powell study, annoyance was flat up to an LEQ of 47 dB and then grew as a linear function of LEQ up to 59 dB.²⁷ No one has carried out a similar experiment for nighttime noise. Schomer found that the traditional 10 dB nighttime penalty, used in the determination of DNL, is consistent with community attitudinal data.²⁸

During the 1970s, there was a widespread belief among environmental noise scientists in the U.S. Department of Defense that a given LEQ from rotary-wing is more annoying than an equal LEQ from fixed-wing aircraft. This belief was reflected in official policy through the imposition of a 7 dB penalty to be added “to meter readings obtained under conditions where Blade-Slap was present until and unless meters are developed which more accurately reflect true conditions.”²⁹ Blade-Slap or BVI noise occurs during the descent condition for landing. It is the result of interaction by a rotor blade with previously shed tip vortices. These interactions generate a complex unsteady pressure field that propagates below the rotor as high impulsive noise.

The need for a Blade-Slap penalty was based primarily on laboratory studies. Leverton (1972) conducted one of the first studies comparing the A-weighted sound level from helicopter operations with and without Blade-Slap. The study, conducted in a simulated living room, found that the presence of Blade-Slap increased the subjects’ annoyance to helicopter noise by the equivalent of 4-8 dB.³⁰ Other researchers who found that there was a need for a Blade-Slap correction included Man-Acoustics (1976), Lawton (1976), Wright and Damongeot (1977), Galanter *et al.*, (1977), Galloway (1978), Klump and Schmidt (1978), and Sternfeld and Doyle (1978).^{31,32,33,34,35,36,37}

²⁶ W. Passchier-Vermeer, and W.F. Passchier, 2000, “Noise Exposure and Public Health,” *Environmental Health Perspectives*, **108** Supplement 1, 123-131, March 2000

²⁷ J.M. Fields and C.A. Powell, 1987, “Community reactions to helicopter noise: Results from an experimental study,” *Journal of the Acoustical Society of America*, **82**, 479-492

²⁸ P.D. Schomer, 1983b, “A Survey of Community Attitudes Toward Noise Near a General Aviation Airport,” *Journal of the Acoustical Society of America*, **74**, 1773-1781

²⁹ DOD, 1977, Department of Defense Instruction 4165.57, 8 November 1977, “Air Installations Compatible Use Zones.”

³⁰ J.W. Leverton, 1972, “Helicopter Noise – Blade-Slap, Part 2, Experimental Results,” NASA Technical Report CR1983, March 1972.

³¹ Man-Acoustics & Noise, Inc., 1976, “Certification Considerations for Helicopters Based on Laboratory Investigations,” Report prepared for U.S. Department of Transportation, FAA-RD-76-116, July 1976.

Other laboratory studies suggested that a simple measure of impulsivity does not capture the unique annoyance of helicopter noise. Berry *et al.* (1975) found subjects to be more responsive to the “roughness” quality of the sound than to the Blade-Slap, *per se*.³⁸ Similarly, Galloway (1977) found the annoyance to be related to the rate of impulses.³⁹ Ohshima and Yamada (1987), using a variable high pass filter, concluded that low-frequency energy below 50 Hz did not contribute to the annoyance, but that low-frequency energy between 50 and 200 Hz did contribute.⁴⁰

Subsequent field studies failed to produce support for a Blade-Slap penalty. In a U.S. Army study, listeners judged the annoyance of overflights by different helicopters and a control fixed-wing aircraft heard outdoors. The study found that their annoyance judgments correlated with A-weighting without the need for further correction.⁴¹ Although the U.S. Army researchers concluded that a 2 dB penalty was consistent with the results, they asserted, “no correction for Blade-Slap was found which improves the prediction of annoyance.” In a NASA study, listeners compared the annoyance of helicopter and propeller aircraft flights heard both indoors and outdoors. Annoyance was accurately predicted by SEL.⁴² In a subsequent community noise study of Fields and Powell (1987), unsuspecting residents reacted similarly to the flights of two helicopter types that had very dissimilar noise signatures.⁴³

There is general agreement among a wide range of experts that adding a penalty to the A-weighted SEL to account for the annoyance of Blade-Slap is not justified.^{44,45,46,47,48,49,50} In spite

³² B.W. Lawton, 1976, “Subjective Assessment of Simulated Helicopter Blade-Slap Noise,” NASA Langley Research Center, NASA TN D-8359, December 1976.

³³ S.E. Wright, and A. Damongeot, 1977, “Psychoacoustic Studies of Impulsive Noise,” Paper #55, Third European Rotorcraft Powered Lift Aircraft Forum, Aeronautical and Astronautic Association of France, September 1977.

³⁴ E. Gallanter, R.D. Popper, and T.B. Perera, 1977, “Annoyance scales for simulated VTOL and CTOL overflights,” Paper given at the 94th meeting of the Acoustical Society of America, Miami, Florida, December 1977.

³⁵ W.J. Galloway, 1978, “Review of the Development of Helicopter Impulsive Assessment Proposals by ISO TC43/SC1/WG2 – Aircraft Noise,” Memorandum Report, January 1978.

³⁶ R.G. Klump and D.R. Schmidt, 1978, “Annoyance of Helicopter Blade-Slap,” Naval Ocean Systems Center Technical Report 247, 3 July 1978.

³⁷ H.M. Jr. Sternfeld, and L.B. Doyle, 1978, “Evaluation of the Annoyance Due to Helicopter Noise,” NASA Contractor Report 3001, June 1978.

³⁸ B.G. Berry, A.J. Renie, and H.C. Fuller, 1975, “Rating Helicopter Noise: The Feasibility of an Impulsive Noise Correction,” National Physical Memorandum for ISO/TC43/SC1/WG2, October, 1975.

³⁹ W.J. Galloway, 1977, “Subjective Response to Simulated and Actual Helicopter Blade-Slap Noise,” Bolt, Beranek and Newman Report No. 3573 for NASA, December 1977.

⁴⁰ T. Ohshima and I. Yamada, 1987, “The evaluation of normal take-off/landing helicopter noise,” *Inter-Noise 87*, 1037-1041.

⁴¹ J.H. Patterson, Jr. B.T. Mozo, P.D. Schomer, and R.T. Camp, 1977, “Subjective Ratings of Annoyance Produced by Rotary-Wing Aircraft Noise,” U.S. Army Medical Research and Development Command, USAARL Report, No. 77-12, May 1977.

⁴² C.A. Powell, 1978, “A Subjective Field Study of Helicopter Blade-Slap Noise,” National Aeronautics and Space Administration, Langley Research Center, NASA Technical Memorandum 78758, July 1978.

⁴³ J.M. Fields and C.A. Powell, 1987.

⁴⁴ ICAO, 1981, Loughborough University of Technology, Studies of Helicopter Noise Perception: Background Information Paper, ICASo Committee on Aircraft Noise, Working Group B, December 1981.

of the objective evidence that helicopter noise, at a given A-weighted decibel level, is no more annoying than fixed-wing aircraft noise, there is survey evidence that the public reacts more negatively to helicopter noise than to fixed-wing aircraft noise. This phenomenon is discussed below.

3.5.1 Heightened reaction to helicopter noise

Typical of heightened reaction to helicopter noise is the experience of the U.S. Navy at Miramar Marine Corps Air Station. Miramar had long been a naval air station famed for its Top Gun School and its F-14 Tomcats. But with Top Gun moving to Fallon, Nevada, and the Tomcats being assigned to other bases, Miramar was turned over to the Marine Corps in 1997, which brought in helicopter and F-18 operations. Almost from the beginning, residents have complained about noise and pollution and expressed concerns over possible helicopter crashes. Yet, the noise contour map is not significantly different from when the F-14 aircraft were operating.⁵¹ In addition, the contribution of helicopter operations to the overall DNL is much less than that of the F-18 operations.

An example of heightened reaction to helicopters at a general aviation airport was published by Schomer (1983b).⁵² At an airport where the noise exposure was dominated by fixed-wing aircraft and with less than two helicopter operations per week, 7 percent of the people exposed to a DNL of 66 dB reported themselves to be “highly annoyed” by helicopters. A 1982 study from the United Kingdom also found a heightened reaction to helicopter noise.^{53,54,55} In the community of Lower Feltham, the contribution of fixed-and rotary-wing aircraft to the overall noise exposure was about equal. However, the percentages of people who considered helicopters more disturbing than fixed-wing aircraft were 2 to 2.5 times as large as the percentages that considered helicopters less disturbing. In the communities of Esher and Epsom, where the numbers of helicopters and a fixed-wing aircraft were about equal, the disturbance due to helicopter noise was 2.5 times as large as that due to fixed-wing aircraft noise. People were more annoyed by the helicopters even though, on average, the fixed-wing aircraft were 5.0 dB louder.

⁴⁵ J.A. Molino, 1982, “Should Helicopter Noise Be Measured Differently from Other Aircraft Noise?,” NASA Contractor Report No. 3069, Wyle Laboratories, Crystal City, VA.

⁴⁶ J.B. Ollerhead, 1982, “Laboratory Studies of Scales for Measuring Helicopter Noise,” NASA Contractor Report 3610, November 1982.

⁴⁷ W. Passchier-Vermeer, 1994, “Rating of Helicopter Noise with Respect to Annoyance,” English Version, TNO-Report 94.061, Leiden, The Netherlands.

⁴⁸ T. Ohshima, and I. Yamada, 1993, “Psycho-Acoustic Study on the Effect of Duration on the Annoyance of Helicopter Noise Using Time Compressed or Expanded Sounds,” *Inter-Noise 93*, 1087-1090.

⁴⁹ T. Gjestland, 1994, “Assessment of helicopter noise annoyance: A comparison between noise from helicopters and from jet aircraft,” *Journal of Sound and Vibration*, **171**, 453-58.

⁵⁰ G. Bisio, U. Magrini, and P Ricciardi, 1999, “On the helicopter noise: A case history,” *Inter-Noise 99*, 183-188.

⁵¹ Wyle Research Report WR 94-25, 1995, Aircraft Noise Study for Marine Corps Air Station Miramar, CA, Wyle Laboratories, Arlington, VA, August 1995.

⁵² P.D. Schomer, 1983b.

⁵³ C.L.R. Atkins, 1983, “1982 Helicopter Disturbance Study: Tabulations of the Responses to Social Surveys,” London Civil Aviation Authority, DR Communication 8302.

⁵⁴ C.L.R. Atkins, P. Brooker, and J.B. Critchley, 1983, “1982 Helicopter Disturbance Study: Main Report,” London: Civil Aviation Authority, DR Report 8304.

⁵⁵ P. Prescott-Clarke, 1983, “1982 Aircraft Noise Index Study and 1982 Helicopter Disturbance Study: Methodological Report,” Social and Community Planning Research, London.

In general, there are a number of possible explanations for heightened community response to helicopter noise. The possible explanations, which are not mutually exclusive, include the following:

- A subsection of the population may be more sensitive to the low-frequency helicopter noise than is the majority of the population;
- A-weighting is possibly not the most appropriate metric with which to assess helicopter noise because A-weighting attenuates the low-frequency noise component;
- Noise-induced building vibration and rattle has been shown to significantly increase noise annoyance and helicopter sound is rich in low-frequency content;
- There is some evidence that suggests helicopter noise is slightly more annoying than fixed-wing aircraft noise at the same sound exposure level;
- Helicopter noise may be more noticeable because of its periodic impulsive characteristic;
- There is the possible phenomena of “virtual noise” in which a set of non-acoustical factors, such as bias (a personal judgment that the helicopter does not need to fly here) and fear (of crashes/injury/death), greatly enhances people’s negative attitudes; and
- The way helicopters are operated can influence reactions, i.e., stationary hover and flexible low altitude flight capability.

3.5.2 Low-frequency sensitivity

Over the past 30 years there have been a series of papers describing a subset of the population that is especially sensitive to low-frequency noise. In general, low-frequency noise includes the range from about 16 Hz to about 100 Hz. Apparently, a subset of the population is very sensitive to noises in this frequency range and is quite bothered and disturbed by this noise almost as soon as it crosses the threshold of audibility.^{56,57,58,59} The size of this subset is not known.

Patterson *et al.* (1977) used 25 subjects to study the subjective ratings of annoyance produced by rotary-wing aircraft noise. In an outdoor setting, the subjects judged the sounds from many types of military helicopters performing level flyovers climbs, descents, and turns. A numerical rating scheme was used and a DC-3 aircraft served as the control sound source. Statistical correlations were performed using A, B, C, and D-weighting and various forms of EPNL. Most of the 25 subjects had subjective ratings that correlated well with A-weighted measures. However, 11 of the subjects had subjective ratings that correlated well with C-weighted measures. For three of

⁵⁶ S. Yamada, 1982, “Occurrence and control of low frequency noise emitted from an ice cream storehouse, *Journal of Low Frequency Noise and Vibration*, **1**(1), 19-21.

⁵⁷ W. Tempest, 1985, “Discussion at end of 3rd International Conference on Low Frequency Noise and Vibration, London, September 1985,” *Journal of Low Frequency Noise and Vibration*, **4**(4), 168-180.

⁵⁸ S. Yamada, T. Watanabe, T. Kosaka, and N. Oshima, 1987, “Construction and analysis of a database of low frequency noise problems,” *Journal of Low Frequency Noise and Vibration*, **6**(3), 114-118.

⁵⁹ M. Mirowska, 1998, “An investigation and assessment of annoyance of low frequency noise in dwellings,” *Journal of Low Frequency Noise and Vibration*, **17**(3), 119-126.

these, the correlation with C-weighting was better than the correlation with A-weighting, and for one, the correlation is much better.⁶⁰ Thus this study appears to have discovered a subset of individuals who are more sensitive to the low-frequency energies than are the majority.

3.5.3 Is A-weighting the optimum weighting for assessing helicopter sound?

As discussed above, there is some evidence that the A-weighting metric may not fully characterize human reactions to noise events with substantial low-frequency content. With the focus on industrial noise sources, ANSI S12.9 Part 4 provides a supplemental measure to A-weighting for the assessment of sounds with strong low-frequency content. This measure combines the sound energies in the 16, 31, and 63 Hz octave bands.⁶¹ Both Germany and Denmark have special low-frequency sound measures that utilize sound energy in the 16, 31, and 63 Hz octave bands and Denmark adds energies in the 125 Hz band. As a possible alternate to A-weighting (which changes only with frequency), Schomer (2000) suggested the use of the equal-loudness level contours as a weighting function that changes with both amplitude and frequency. He showed that the 2 dB adjustment that possibly should be applied to helicopter sounds compared with fixed-wing aircraft sounds can be derived from the known functions of human hearing.⁶²

As noted above, low-frequency noise complaints begin at the threshold of hearing. Further, small increases (decreases) in low-frequency noise levels can yield large increases (decreases) in annoyance. Møller (1987) measured both equal loudness and equal annoyance functions at low-frequencies (4, 8, 16, and 31.5 Hz). At these frequencies, changes of 2, 3, 4, or 5 dB yielded the same change in annoyance as a 10 dB change in sound level at 1000 Hz. That is, a 2 dB change in level at 4 Hz yields the same change in annoyance as a 10 dB change at 1000 Hz.⁶³

For throbbing low-frequency noise, the complaint threshold can be below the threshold of audibility. The throbbing noise or distinctive rhythmic low-frequency helicopter sound is an inherent consequence of the main rotor blades periodic motion. Vercammen (1989) suggests a 5 dB adjustment for throbbing noise.⁶⁴ The Schomer paper (May 2000) explains this effect. The hearing function reacts to a 2 to 5 dB change in level as if it were a change in loudness of 10 dB. When throbbing occurs at low-frequencies, the actual loudness is greater than that predicted by the equivalent level. Stated another way, even though the equivalent level of a sound may be below the threshold of audibility, the sound is audible. The mistake is using the equivalent level at low-frequencies.⁶⁵ Schomer and Bradley (2000) have confirmed this effect using independently gathered data.⁶⁶

⁶⁰ J.H. Patterson, B.T. Jr. Mozo, P.D. Schomer, and R.T. Camp, 1977.

⁶¹ ANSI, 1996, American National Standard Quantities and Procedures for Description and Measurement of Environmental Sound—Part 4: Noise Assessment and Prediction of Long-Term Community Response, ANSI S12.9-1996—Part 4, American National Standards Institute (ANSI), New York, NY.

⁶² P.D. Schomer, 2000, "Loudness-Level Weighting for Environmental Noise Assessment," *Acustica—Acta Acustica*, **86**, 49-61, January 2000.

⁶³ H. Møller, 1987, "Annoyance of audible infrasound," *Journal of Low Frequency Noise and Vibration*, **6**(1), 1-17.

⁶⁴ M.L.S. Vercammen, 1989, "Setting limits for low frequency noise," *Journal of Low Frequency Noise and Vibration*, **8**(4), 105-109.

⁶⁵ P.D. Schomer, 2000.

⁶⁶ P.D. Schomer and J.S. Bradley, 2000, "A test of proposed revisions to room noise criteria curves," *Noise Control Engineering Journal*, **48**(4), 124-129, (July/August 2000).

3.5.4 Noise induced building vibrations and rattles

In a study by Schomer and Neathammer (1985), subjects made judgments of the annoyance of helicopter flights while outdoors, in the living room of a new mobile home, and in an old frame house. During the tests, the supervising technician judged the amount of rattle during each flyover. The annoyance judgments were grouped by whether no rattle had been present, a little rattle had been present, or a lot of rattle was present. Clear differences emerged. When there was a little rattle, annoyance increased by an equivalent 10 dB. When there was a lot of rattle, annoyance increased by an equivalent 20 dB.⁶⁷ When the same experiments were repeated using better-built military housing, the annoyance due to rattle was quite reduced.⁶⁸

In a study by Schomer and Averbuch (1989), subjects judged the annoyance of simulated blast sounds created using a giant (3 by 4 meter) woofer. Two groups of subjects responded in the same facility to the same set of test sounds using the same control sounds. The only difference was a small source of rattle on one window in the test house in which the subjects were situated. Although the rattle sounds were virtually unmeasurable at the ears of the test subjects compared with the blast sound itself, the mere presence of these rattle sounds raised the equivalent annoyance by about 6 to 13 dB depending on blast sound level.⁶⁹ The evidence seems to support the notion that annoyance increases on the order of 10 dB when there are noticeable rattle sounds over the annoyance predicted based on measures of just the sound itself. If the helicopter sound produces noticeable rattles, then the study results suggest that it is likely that the annoyance will be significantly greater than that predicted on the basis of just the A-weighted measures.

The C-weighting has been used in the United States for almost 30 years to assess blast noise and sonic booms in order to account for the noise-induced rattles generated by these sounds, and currently, several other countries also use the C-weighting for this purpose. It is primarily the sound energies in the 10 to 30 Hz ranges that induce wall vibrations. The C-weighting could be used to identify those helicopter sound energies that will induce wall vibrations.

3.5.5 Helicopter noise is more annoying than fixed-wing aircraft noise

Some studies have shown no increase in annoyance for helicopter noise as compared with fixed-wing aircraft noise. Others have shown a small adjustment. The most realistic studies are those that use subjects outdoors or in real houses with real helicopters to create the stimulus. Unfortunately, most studies are performed in the laboratory using simulated sounds. As discussed above, Patterson *et al.* (1977) used 25 subjects to study the subjective ratings of annoyance produced by real rotary-wing aircraft noise. On a per event basis, he found a +2 dB adjustment for the annoyance of helicopter sounds as compared with fixed-wing aircraft sound producing the same A-weighted sound exposure level.⁷⁰ In a similarly constructed experiment using real helicopters and a fixed-wing aircraft as the control, Powell (1981) placed subjects both

⁶⁷ P.D. Schomer, and R.D. Neathammer, 1985.

⁶⁸ P.D. Schomer, B.D. Hoover and L.R. Wagner, 1991, "Human Response to Helicopter Noise: A Test of A-Weighting," Technical Report N-91/13, USA Construction Engineering Research Laboratory, November 1991.

⁶⁹ P.D. Schomer and A. Averbuch, 1989, "Indoor human response to blast sounds that generate rattles," *Journal of the Acoustical Society of America*, **86**(2), 665-673, August 1989.

⁷⁰ J.H. Patterson, B.T. Jr. Mozo, P.D. Schomer, and R.T. Camp, 1977.

outdoors and inside real houses. He found a 3 to 5 dB adjustment of the EPNL for subjects situated indoors and no adjustment for subjects situated outdoors.⁷¹

3.5.6 Helicopter sounds may be more readily noticeable than other sounds

At the same A-weighted sound exposure, a helicopter may be much more noticeable than a fixed-wing aircraft because of the impulsive blade-slap sound. Schomer and Wagner (1996) performed an *in-situ* study in respondents' homes. Clusters of subjects were chosen and an outdoor sound monitor was used to measure ASEL and to record the times at which they occurred. The three sources studied were helicopters, fixed-wing aircraft, and trains. For the same ASEL, helicopter sounds were not found to generate any greater *annoyance per event* than did the other two sounds. *Rate of response* was used as the main indicator of noticeability. Rate of response is defined as the ratio or relative order of magnitude of percent average noticeability comparing two unique sources of noise. In this case, helicopter noise was compared to fixed-wing airplane and train noise. The *rate of response* function for helicopter sounds grew at three times the *rate of response* functions found for airplanes and trains. This paper showed that sound noticeability may be a significant variable for predicting human response to noise. The character of the sound was a key ingredient to noticeability. Helicopters, with their distinctive sound character, appeared to be more noticeable than other sounds for the same A-weighted sound exposure level.⁷²

3.5.7 Attitudes—non-acoustic factor

The community attitudes towards the noise source can be an important influence on the degree of annoyance. The Environmental Protection Agency (EPA) in 1974 suggested that the measured noise level can be adjusted downward by 5 dB when the party that generates the noise maintains very good community relations and convinces the community that everything possible that can be done is being done to reduce the noise.⁷³ Further study is needed to confirm EPA's result in this regard. The meta-analyses of Fields (1993) confirmed that community attitude is an important modifier of annoyance. This was one of five attitudes confirmed as important by the study. In addition to "noise prevention beliefs," Fields listed "fear of danger from the noise source," "beliefs about the importance of the noise source," "annoyance with non-noise impacts of the noise source," and "general noise sensitivity."⁷⁴

In a more detailed study of attitudes, Staples *et al* (1999) combined elements of Fields' "noise prevention beliefs," "beliefs about the importance of the noise source," and "annoyance with non-noise impacts of the noise source" into a 10-item Environmental Noise Risk Scale. Their 351 subjects were living in the 55 to 60 dB DNL zone of a former military airfield that had been converted for civil use. They found that the environmental noise risk scale accounted for

⁷¹ C.A.Powell, 1981, "Subjective Field Study of Response to Impulsive Helicopter Noise," NASA Technical Paper 1833, April 1981.

⁷² P.D. Schomer and L.R. Wagner, 1996, "On the Contribution of Noticeability of Environmental Sounds to Noise Annoyance," *Noise Control Eng. J.*, **44**(6), 294-305, Nov-Dec 1996.

⁷³ EPA, 1974, "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety," US Environmental Protection Agency, Office of Noise Abatement and Control (ONAC), Rpt. EPA550/9-74-004, Washington D.C.

⁷⁴ J.M. Field, 1993, "Effect of Personal and Situational Variables on Noise Annoyance in Residential Areas," *Journal of the Acoustical Society of America*, **93**, 2753-2763.

36 percent of the variation in individual disturbance from noise. Particularly powerful was a statistical factor that they labeled, “appraisal of one’s neighborhood as inadequately protected and vulnerable to future increases in noise.”⁷⁵

Several of the attitudinal factors described above appear in the written submissions to the FAA. There is the belief that helicopters used for transportation of corporate executives, sightseeing, or ENG are unimportant. There is also the fear factor associated with helicopter overflights. There is the perception that helicopters could fly higher than they do and over less noise-sensitive areas. People feel that their privacy is being invaded when a helicopter flies low or hovers near their residence. Ollerhead and Jones (1994) noted the importance of privacy, noise prevention beliefs, and fear of crashes in neighborhoods around the Battersea Heliport. Ollerhead and Jones (1994) suggested people feel that a helicopter is “a rich man’s toy.”⁷⁶

3.5.8 Vertical TakeOff/Landing (VTOL) capability

In contrast to fixed-wing aircraft, helicopters have additional flight capabilities, such as hover and vertical operations. These additional operational degrees of freedom can produce uniquely different noise signatures due to the varying complex source noise mechanisms. Noise generated over an extended period of a hover operation can lead to low-frequency droning that could enhance annoyance. Where fixed-wing aircraft require an airport with sizable runways for landings and takeoffs, helicopters can operate on much smaller landing sites that could be relatively close to residential communities. This creates an immediate local environment of higher noise levels that can be further compounded by the other dynamic helicopter noise effects. Related operational approaches for noise mitigation regarding VTOL capabilities are discussed in detail in Section 6.1.

⁷⁵ S.L. Staples, R.R. Cornelius, and M.S. Gibbs, 1999, “Noise disturbance from a developing airport: Perceived risk or general annoyance,” *Environment and Behavior*, **31**(5), 692-710.

⁷⁶ J.B. Ollerhead and C.J. Jones, 1994, “Social Survey of Reactions to Helicopter Noise,” London: Civil Aviation Authority.

4.0 Public Input on Noise Reduction

In this section, responses to the FAA's request for information are summarized. Suggested noise reduction approaches and concerns expressed by the public are presented. Written comments were solicited by publication of notices in the Federal Register. The FAA held two public workshops in Washington, DC to obtain additional comments. The compiled study information (comments and workshop presentations) are accessible on the FAA's Office of Environment and Energy website:

<http://www.aee.faa.gov/>
under the link: "Section747-Nonmilitary Helicopter Noise"

As the result of a thorough review, the issues were grouped as either operational or non-operational. These issues were then sub-categorized according to applicable FAA regulations creating the following outline:

A. Operational Issues –

[related to 14 CFR part 91 - General Operating and Flight Rule]

- 1) Minimum altitude for overflight and hover;
- 2) Operational routes & routing design guidelines;
- 3) Hover duration time;
- 4) Retirement of noisiest helicopters;
- 5) Visible identification markings;

[related to:

14 CFR part 150 regulation – Airport Noise Compatibility Planning and

14 CFR part 161 regulation -Notice and Approval for Airport Noise & Access Restrictions

- 6) Frequency of helicopter operations (number of flights);
- 7) Time frame of helicopter operations (hours of operation);
- 8) Heliports/airports operations (i.e., ground run-up duration);
- 9) Noise abatement procedures;

[related to with 14 CFR part 36 - Noise Standards: Aircraft Type and Airworthiness Certification]

- 10) Noise certification limit stringency;
- 11) Implementation of noise reduction technology (i.e., helicopter "hushkits?");

B. Non-operational Issues –

- 12) Industry's voluntary "Fly Neighborly" program effectiveness;
- 13) ENG redundant flights;
- 14) Acceptance of public service helicopter operations; i.e., law enforcement, EMS, and fire fighters;
- 15) VFR/IFR ATC operations access for helicopters;
- 16) Empowerment of local municipalities with airspace control;

(Note: military helicopters are not addressed because they are outside of the mandate scope)

Supporting Technology Initiatives-

- 17) Socio-acoustic (psychoacoustic) study relating medical and health effects;
- 18) Tracking helicopter traffic growth and noise measures to quantify impact of noise sensitive community sites (parks, hospitals, neighborhoods, etc);
- 19) Utilize GPS approach/departure for noise abatement operations; and
- 20) Insensitivity of A-weight measurements to low-frequency noise impact of helicopters.

4.1 Synopsis of Responses

Views from representatives of the helicopter industry and organizations with an interest in reducing nonmilitary helicopter noise were sought, reviewed, and are presented in this section.

The organizations offering input were as follows:

Helicopter Noise Coalition of New York City - New York City, NY
League of the Hard of Hearing - New York City, NY
W400 Block Association - New York City, NY
Fifteenth Street Block Association (represents the West 200 Block) - New York City, NY
Federation of Citywide Block Associations - New York City, NY
Vinegar Hill Neighborhood Association - Brooklyn, NY
Community Board 7 - New York City, NY
The City College of the City University of New York - New York City, NY
Weehawken Environment Committee - Weehawken, NJ
Coalition to Quiet Our Neighborhood - West Orange, NJ
Noise Pollution Clearinghouse - Montpelier, VT
The MARCH Coalition Fund, Inc. - Poway, CA
Homeowners of Encino - Encino, CA
Sherman Oaks Homeowners Association (SOHA) - Sherman Oaks, CA
Lake Balboa Neighborhood Association - Van Nuys, CA
West Hill Property Owners Association (WHPOA) - Encino, CA .
Citizens for a Quiet Environment - Corrales, NM
Federation of University Neighborhoods - Albuquerque, NM
South Broadway Action Team - Albuquerque, NM

Similarly, the helicopter industry was represented by:

American Helicopter Society (AHS) International, VA - technical society
Helicopter Association International, VA - national operators association
Bell Helicopter Textron Inc., TX - manufacturer
Robinson Helicopter Co., CA- manufacturer
Whisper Jet Inc., FL - retrofit manufacturer
Eastern Regional Helicopter Council, PA - operators' affiliate

Congressional representatives and local governments also contributed their comments and recommendations. Other specialized related aviation industry representatives, such as the helicopter law enforcement, helicopter medical services, and airports, also provided information and comments. The specific affiliation and concerns expressed are summarized in Table 4-1.

4.2 Scoping Questions

The FAA published a notice in Federal Register [Docket No. 30086: Report to Congress on Effects of Nonmilitary Helicopter Noise on Individuals in Densely Populated Areas in the Continental United States (65 FR 39220)] on June 23, 2000, requesting information from people concerned with nonmilitary helicopter noise. The request for information was confined to the context of the effects of nonmilitary helicopter noise on individuals in densely populated areas of the continental United States. The following four questions were posed:

- What are the types of helicopter operations (law enforcement, electronic news gathering, sightseeing tours, etc.) that elicit the negative response by individuals in densely populated areas?
- What air traffic control procedures are applicable in addressing helicopter noise reduction? Why?
- What impacts could restrictive air traffic control procedures have on operation of:
 - Law enforcement helicopters?
 - Electronic news gathering (ENG) helicopters?
 - Sightseeing tour helicopters?
 - Emergency medical services (EMS) helicopters?
 - Corporate executive helicopters?
- What are the recommended solutions for reduction of the effects of nonmilitary helicopter noise?

Although the comments received were not always directly responsive to the four questions, responses were grouped to the extent practical according to the questions. An overall summary of the responses is presented in Table 4-1. The responses are described in detail below.

TABLE 4-1.

SUMMARY OF COMMENTS IN RESPONSE TO REQUEST: LISTED IN ORDER OF RECEIPT

Question #		Current Concerns							Suggested Solutions												
		Low AGL	Hours	Route	Hover	Struct Vib/Dam.	Operation Type*	Curfew	Min AGL	Max SPL	Spec Route	Visible ID	Limit # Ops	Limit Hover	Pool Ops	Hush Kit	Stage 3	Part 91	Heliport	#	
1	Ontario Police Dept.	CA	<500'	X																	1
2	MARCH Coalition	CA					Mil		X		X										2
3	Individual, Springfield	VA	<1000'	X		X	PD, Mil, EMS		X									X			3
4	Individual, Sherman Oaks	CA	X				ENG	X	X		X			X						X	4
5	Individual, Juneau	AK					SS	X													5
6	Individual, Portland	OR	X	X		X	ENG		X	X			X					X			6
7	Hayward Airport	CA	X		X		PD, ENG, PT, EMS		X		X									X	7
8	Robinson Helicopter	CA							X	X											8
9	Seattle Council on Airport Affairs	WA	X	X		X	All	X	1500'		X	X									9
10	Clark Co. Dept Aviation	NV							1000'/500'								X				10
11	Hel. Noise Coalition NY City (O)	NY			X		All	X	X		X	X		X	X		X		X		11
12	Assoc. Air Medical Services	VA																			12
13	Representative Carolyn Maloney (O)	NY					All	X	X			X									13
14	AHS International (O)	VA					Indeter		1000-2000'		X										14
15	City of Portland	OR							2000'										X		15
16	Bell Helicopter/Textron	TX	X				Indeter									X					16
17	Helicopter Assoc. International (O)	VA					Indeter		1000-2000'												17
18	Individual, NY City	NY		X				X	1500'		X	X		X	X					X	18
19	Individual, Sherman Oaks	CA		X		X	ENG, PD	X	X					X							19
20	Jones Farm HOA, Hillsboro	OR	X	X	X		PT						X							X	20
21	Whisper Jet, Inc., Sanford (O)	FL							X							X					21
22	Lake Balboa Neigh. Assoc, Van Nuys	CA	X	X	X	X	ENG, SS	X	X		X		X							X	22
22A	Fairway Park Neigh. Assoc., Hayward	CA					None														22A
23	Individual, Sherman Oaks	CA	X	X	X		ENG											X			23
24	Eastern Region Helicopter Council (O)	PA		X	X		Indeter		2000'		X										24
25	Individual, Chester	VA	X		X				1000'+										X		25
26	Individuals, Portland	OR	X				ENG		X					X							26
27	Individuals, Portland	OR	X	X			ENG		X												27
28	Individuals, Portland	OR	X	X		X	ENG, EMS, Taxis		X								X				28
29	Homeowners of Encino (NHNC) (O)	CA	X	X	X		All	X	1500'		X	X	X	X	X		X	X			29
30	Individual, Torrance	CA	X		X				X		X		X				X				30
31	Individual, San Lorenzo (Hayward) (O)	CA	X	X	X	X	ENG, PT, PD		X			X					X		X		31
32	Member Community Board 7, NYC	NY					All	X	1500'		X	X		X	X		X				32
33	Airport Commission, San Francisco	CA	X			X			1000'					X							33
34	Wrong docket																				34
34A	NY State Senator T. Duane	NY					All	X	X		X	X		X	X						34A
34B	President, Borough of Manhattan	NY																			34B
34C	Representative Adam Smith	WA																			34C
34D	Council Member C. Quinn, City of NY	NY																			34D
35	Individuals, Encino (O)	CA	X	X	X	X	ENG, SS	X	X		X		X		X					X	35

TABLE 4-1. (CONT).

SUMMARY OF COMMENTS IN RESPONSE TO REQUEST: LISTED IN ORDER OF RECEIPT (CONTINUED)

Question #	Respondent	State	Current Concerns					Suggested Solutions														#				
			Low AGL	Hours	Route	Hover	Struct Vib/Dam.	Operation Type*	Curfew	Min AGL	Max SPL	Spec Route	Visible ID	Limit # Ops	Limit Hover	Pool Ops	Hush Kit	Stage 3	Part 91	Heliport						
36	Individual, City College	NY						All		1500'			X	X	X	X	X									36
36A	Individual, Brooklyn	NY																								36A
37	Individual, Brooklyn	NY	X	X		X	X	ENG, SS, Com																X		37
37A	Individual, NY City	NY		X				All																		37A
37B	Air Methods Corp, Englewood	CO								1000-2000'																37B
38	Individuals, NY City	NY		X		X								X												38
39	Individual, NY City	NY	X			X		PD,ENG,SS Film		X			X			X										39
40	W400 Block Assoc.	NY	X			X							X		X	X										40
41	Individual, NY City	NY			X								X													41
42	Individual, Puunene	HI																								42
43	Hel. Noise Coalition NY City (O)	NY																								43
44	League for the Hard of Hearing	NY																								44
45	Individual, Hoboken	NJ		X		X		SS, Com, ENG						X								X				45
46	Individual, Brooklyn	NY		X	X			Corp. Gov	X				X		X											46
47	Federation of University Neighborhoods	NM	X	X		X		ENG, EMS		2000'			X			X										47
48	Individual, Brooklyn	NY		X	X	X		ENG, SS, Corp						X												48
49	Individual, NY City	NY	X			X		SS,ENG,PD,Corp, Film						X										X		49
50	Individual, NY City	NY	X	X		X		Corp. SS		X				X	X	X						X				50
51	Individual, Brooklyn	NY	X	X		X		Corp. ENG		X			X													51
52	Noise Pollution Clearinghouse	VT	X	X	X	X				3000'			X									X		X		52
53	Individual, NY City	NY	X	X	X	X	X	SS,ENG,Corp,Com																		53
54	Council Member K.Fisher, City of NY	NY	X	X	X		X	ENG, Corp		X			X			X										54
55	Representative Jerrold Nadler (O)	NY	X	X				SS,ENG,Corp		X			X			X						X				55
55A	Individual, NY City	NY	X	X		X		ENG		X			X			X	X									55A
56	Individual, NY City	NY	X	X	X	X	X	ENG		X				X	X	X										56
56A	WestHillsPropOwnerAssoc/HOEncino(O)	CA	X	X	X			ENG	X	1500'			X	X	X	X	X					X	X	X		56A
57	Individuals, Brooklyn	NY		X		X		ENG		X																57
58	Individual, Pleasant Hill	CA						PT																		58
59	Individual, El Segundo (O)	CA				X		ENG		X				X	X							X				59
60	Individual, NY City	NY			X							X														60
61	Individual, NY City	NY	X																							61
61A	NY Assembly Member R Gottfried	NY																								61A
61B	Weehawken Environment Committee	NJ																								61B
62	Individual, NY City	NY			X	X				X			X	X												62
63	Fifteenth Street Block Assoc.	NY											X		X	X										63
64	Individual, Albuquerque	NM		X	X	X		PD, ENG				X														64
65	NY Assembly Member E Connelly	NY			X			ENG																		65
66	Representative Jerrold Nadler	NY																								66
67	NY Assembly Member R Gottfried	NY				X		ENG,SS		X			X	X										X		67
68	Individual, NY City	NY																						X		68
69	Weehawken Environment Committee (O)	NJ	X	X	X	X	X	SS,ENG,Corp	X	X			X		X	X	X					X				69
70	Individuals, NY City	NY	X	X		X		ENG		X			X			X										70

TABLE 4-1. (CONT).

SUMMARY OF COMMENTS IN RESPONSE TO REQUEST: LISTED IN ORDER OF RECEIPT (CONTINUED)

Question #		Current Concerns							Suggested Solutions													
#	Respondent	State	Low AGL	Hours	Route	Hover	Struct Vib/Dam.	Operation Type*	Curfew	Min AGL	Max SPL	Spec Route	Visible ID	Limit # Ops	Limit Hover	Pool Ops	Hush Kit	Stage 3	Part 91	Heliport	#	
71	Individual, Brooklyn	NY	X	X		X		ENG		X		X										71
71A	Mayor, City of El Segundo	CA						ENG, Corp		X										X		71A
72	Individuals, Sherman Oaks	CA	X	X				ENG	X					X		X						72
73	Sherman Oaks Homeowners Assoc. (O)	CA	X	X				All	X	X		X		X	X							73
74	Individual, NY City	NY																				74
75	Vinegar Hill Neighborhood Assoc.	NY	X		X	X	X			X		X		X								75
76	Office of Mayor, NY City	NY	X	X				ENG, SS.														76
76A	Coalition to Quiet Our Neighborhood (O)	NJ	X	X			X		X	1500'		X										76A
77	Individual, NY City	NY						ENG, SS, Corp														77
77A	Regional Commission on Airport Affairs	WA																				77A
77B	Regional Commission on Airport Affairs	WA																				77B
77C	Citizens for a Quiet Environment	NM		X		X		ENG, PD, SS, Corp		2000'	X	X	X						X			77C
77D	Individual, San Lorenzo	CA																				77D
77E	Individual, NY City	NY																				77E
77F	Individual, NY City	NY																			X	77F
77G	City Councillor, Cambridge	MA	X	X		X		ENG				X										77G
77H	S. Broadway Action Team, Albuquerque	NM		X		X		PD, ENG														77H
78	Air Methods Corp, Englewood	CO																				CO
79	MD Helicopters, Inc	AZ	X	X		X		PD				variable										AZ
80	Individual, NY City	NY		X	X	X	X	COMM, SS														NY
81	Individual, Las Vegas	NV		X	X	X		SS	X	X		X		X								NV
82	Citizens for a Quiet Environment	NM	X					ENG, PD		2000'	55dBA		X				X					NM
83	Individual, Brooklyn	NY	X		X		X	ENG, SS		2500'		mandatory		X								NY
84	Individual, Lake Balboa	CA	X		X																	CA
85	Metro NY Aircraft Noise Mitigation Commi	NY	X			X				X		X			X	X						NY
86	Individual, Brooklyn	NY	X	X			X	PD														NY
87	Individual, NY City	NY		X	X		X							X								NY
88	Individual, NY City	NY												X								NY
89	Individual, NY City	NY			X									X								NY
90	Individuals, NY City	NY	X	X	X	X		MIL, SS, FIL														NY
91	Individual, NY City	NY		X		X																NY
92	Individual, San Francisco	CA		X	X			SS						X								CA
93	Individual, Valley Village	CA	X	X	X			ENG, PD, EMS, COM	X	X		X	X	X	X	X						CA
94	Individual, Philadelphia	PA	X			X		SS, ENG, COM, PD														PA
95	Individual, Hoboken	NJ		X	X	X		SS, ENG, COM, PD	X			X		X		X						NJ
96	Individual, Locust	NJ					X	COM	X	X		X										NJ
97	Metro NY Aircraft Noise Mitigation Commi	NY								X				X	X	X						NY
98	City of NY Community Brd Six Manhattan	NY							X			X	X									NY
99	Individual, Brooklyn	NY	X	X																		NY
100	Individual, NY City	NY						COM														NY
101	NY Assembly Member Scott Stringer	NY																				NY
102	Individual, Brooklyn	NY	X	X					X	X		X										NY
103	Individual, Brooklyn	NY	X	X		X		PD, ENG		X												NY
104	Community Board 7 Manhattan	NY	X	X	X			PD, ENG, COM	X	X		X			X							NY
105	City of NY, Community Board 2 Manhatta	NY	X			X		PD, ENG, FILM, SS	X	X		X		X		X						NY
106	Brooklyn Heights Association, Inc	NY		X		X								X								106
107	Individual, Brooklyn	NY		X				ENG, COM						X								NY
																						0
	Total Count @ #107		122	56	57	36	39	19		26	64	6	46	17	36	24	22	3	16	7	18	
		%		46	47	30	32	16		21	52	5	38	14	30	20	18	2	13	6	15	

* Mil = Military; PD = Police/Fire Dept.; EMS = Emergency Medical Service; ENG = Electronic News Gathering; SS = Sightseeing; Taxis = Helicopter Taxis; PT = Pilot Training; Indeter = Unable to determine; Com = Commuter; Film = Filming; Corp = Corporate/Business; Gov = Non-emergency governmental

(O) denotes was represented also by oral presentation at one of the two hearings at FAA Headquarters.

4.3 Respondents

After adjusting for duplicate submissions, a total of 122 independent responses were recorded. The breakdown of the respondents by group is given in Table 4-2.

TABLE 4-2: BREAKDOWN OF RESPONDENTS BY GROUP

Group	Number of Respondents	Percentage of Total
Individual Citizens	67	54.9%
Homeowners' Associations	10	8.2%
Citizens' Associations	16	13.1%
Elected Officials	15	12.3%
Helicopter Manufacturers and Technical Associations	5	4.1%
Helicopter Operators' Associations	2	1.6%
Emergency Service Operators and Associations	3	2.5%
Police Departments	1	0.8%
Airport Operators	3	2.5%
Total	122	100%

The distribution of the respondents by state of residence, operation or office location is given in Table 4-3.

In the case of New York and New Jersey, all 67 (54.9 percent) respondents reside in the New York City area. In the case of California, 23 (18.9 percent) respondents reside in the Los Angeles area, and 5 of the 6 (4.9 percent) respondents from Oregon reside in the city of Portland.

Two (1.6 percent) responses came from states (Alaska and Hawaii) that are outside the contiguous United States, but they are included in the analysis for completeness. In addition, one response (from California) is concerned solely with military helicopters. That response is also included for completeness.

Sixteen individuals who submitted written comments also attended and testified at the public workshops. The respondents at the two public workshops consisted of three individuals, three homeowners' associations, three citizens' associations, two elected officials, two helicopter manufacturers and technical associations, two helicopter operators' associations, and one EMS operator.

TABLE 4-3: DISTRIBUTION OF RESPONDENTS BY STATE

<u>State</u>	<u>Number of Respondents</u>	<u>Percentage of Total</u>
Alaska	1	0.8%
Arizona	1	0.8%
California	23	18.9%
Colorado	2	1.6%
Florida	1	0.8%
Hawaii	1	0.8%
Massachusetts	1	0.8%
New Jersey	5	4.1%
New Mexico	5	4.1%
Nevada	2	1.6%
New York	62	50.8%
Oregon	6	4.9%
Pennsylvania	2	1.6%
Texas	1	0.8%
Virginia	5	4.1%
Vermont	1	0.8%
Washington	3	2.5%
Total	122	100%

4.4 Helicopter Operations Eliciting Negative Response

The respondents were asked to identify the types of helicopter operations that elicit negative reaction. Eleven specific types of operation were cited by 63 of the respondents and 9 other respondents stated that all helicopter operations were of concern. The 11 specific types of operation and the number of citations for each type of operation are identified in Table 4-4.

Four respondents were unable to determine the nature of the operations and one respondent stated that there was no noise problem associated with helicopter operations. The remaining 45 respondents did not respond to the question. The specific operations identified by each of the respondents can be found in Table 4-1.

There is strong sentiment among individual citizens, homeowners associations, and citizen associations that ENG operations and sightseeing operations create the most adverse reactions and are the least justifiable.

Several respondents distinguished between police, fire, and medical services. If the operations are truly emergencies, the majority of these respondents indicated that they accept such operations as beneficial to the community. However, routine police patrols and return flights from an emergency are viewed more strictly as non-emergency operations.

TABLE 4-4: TYPES OF HELICOPTER OPERATIONS ELICITING NEGATIVE RESPONSE

Type of Operation	Number of Citations
Electronic News Gathering (ENG)	47
Sightseeing (SS)	24
Corporate/business (Corp)	19
Police (PD)	17
Pilot training (PT)	4
Emergency medical services (EMS)	5
Commuter (Com)	10
Filming (Film)	4
Military (Mil)	2
Helicopter taxis (Taxi)	1
Non-emergency governmental (Gov)	1
All Operations	9

4.5 Operations of Concern

Five specific concerns - low flight altitude, hours of operation, flight routes, hovering, and structural vibration and damage - were given as the main reasons for negative reaction to helicopter operations in urban areas. These concerns are listed in Table 4-1 under the column headings “Low AGL,” “Hours,” “Route,” “Hover,” and “Struct. Vib/Dam,” respectively.

4.5.1 Low Flight Altitude

Low flight altitude was cited by 56 (46 percent) respondents (see Table 4-1), although in only two cases were flight altitudes quoted -- 500 and 1,000 feet Above Ground Level (AGL). Several responses attributed the low flight altitudes, at least in part, to FAA or ATC procedures which either do not specify minimum flight altitudes for helicopters or do not encourage the use of higher flight altitudes for noise abatement. In particular, several respondents referred to FAR Part 91, Section 91.119(d), because it does not specify minimum flight altitudes for helicopters. Section 91.119 exempts helicopters from the altitude restrictions that are imposed on fixed-wing aircraft flights over congested areas. The minimum altitude restriction for fixed-wing aircraft is “1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet of the aircraft.” The regulation requires that helicopters be operated without hazard to persons or property on the surface and that the operator should comply with any routes or altitudes specifically presented for helicopters by the FAA Administrator.

4.5.2 Hours of Operation

Helicopter operations early in the morning and late at night were cited by 57 (47 percent) respondents as causing negative response. The concern cited most frequently was the loss of sleep. Several types of operations were cited, including early morning ENG flights and nighttime police surveillance flights. Respondents from both New York City and Los Angeles claim that ENG helicopter operations begin as early as 5 a.m.

4.5.3 Flight Route

Helicopter flight routes are of concern to 36 (30 percent) respondents, but there is a divergence of opinion regarding the nature of the problem. Some respondents stated that concentrating helicopter flight routes along specific corridors, such as along freeways, unfairly exposes certain residents to even higher noise levels than they endure from freeway traffic. In addition, the helicopters tend to fly over residential areas to the left and right of the freeway rather than directly over the freeway. These respondents suggested that the routes be directed towards open space or industrial areas. Other respondents expressed the concern that helicopter flights followed routes of maximum convenience to the operator, such as following the shortest distance between two points, without regard to residents below. They requested more control over the flight routes. Some respondents recognized that changing the helicopter flight routes to reduce noise levels in one community would probably result in an increase in noise in another community.

There is a divergence of opinion in the responses to the effectiveness of voluntary flight route restrictions. Helicopter operators cite examples where voluntary changes to flight routes have reduced noise exposure of residents of New York City. However, citizen associations claim that helicopters do not always follow voluntary rules.

4.5.4 Hovering

Helicopter's hovering for long durations was the cause of concern for 39 (32 percent) respondents. ENG and police operations were cited as the cause of the majority of the hovering occurrences. There was particularly strong negative reaction to the tendency of ENG helicopters to congregate over a particular incident and hover, as a group, for extended periods of time.

4.5.5 Structural Vibration and Damage

Nineteen (16 percent) respondents stated that helicopter operations caused building structures and fixtures to vibrate and rattle. Several of the responses also claimed that there was a potential for damage to the structures and contents due to the low-frequency vibration. One respondent claimed that actual damage to property had occurred due to helicopter noise.

5.0 Helicopter Air Traffic Control Procedures

In this section, general ATC procedures applicable to helicopters are discussed. Also, the consideration of helicopter law enforcement and other public emergency services are addressed regarding needs and public response.

The NAS is confronted by demand of record growth in passenger volume and flight operations.⁷⁷ As a result, ATC operations are at times strained and encountering congestion and delays. As changes to meet capacity needs are continual, ATC procedures are complex in nature and influence a multitude of interrelated factors. For example, the airspace in and around New York City is one of the busiest urban metropolitan areas with the most complex ATC environments in the country. Heavy volume of air traffic is managed for multiple international airports (LaGuardia, JFK, and Newark), numerous general aviation airports, multiple heliports, and the several exclusion corridors. Defining, managing, and altering the procedures in this airspace will require a comprehensive FAA review. An ATC aircraft operational change, whether for helicopter or small fixed-wing airplane, is certain to pose an impact to large fixed-wing transport during en route, approach, and/or departure operations. Changes must be carefully considered and demonstrated before implementation to fully assess the impact to the overall NAS safety.

5.1 ATC Discussion

The helicopter industry stated that the FAA ATC limited helicopter altitude operations (see Section 5.2 “VFR and IFR Operations”) could benefit noise abatement operations.⁷⁸ FAA believes that current helicopter high altitude boundaries are flexible enough to facilitate noise abatement if desired and requested by pilots. Current helicopter route charts for several major metropolitan areas, such as Boston, Chicago, and New York, were established in collaboration with industry operators to identify "voluntary" operational corridors for safe and minimal noise flights over sensitive areas. The study team reviewed the eight metropolitan helicopter charts and identified more than appropriate upper altitude bounds that would allow for higher altitude noise reduction flight if desired by helicopter operations. For example, within the New York City metropolitan area, the Class B airspaces, surrounding Kennedy/LaGuardia/Newark airports, are controlled from ground surface to 7,000 feet AGL and are available for utilization upon ATC request. Under the lateral boundaries and beneath any available floor of the Class B airspace, VFR operations may be utilized. The opportunity to request higher altitudes for operations, in the interest of noise abatement, is unconstrained by regulation.

Within the metropolitan area of New York City, voluntary noise mitigation operational procedures have been negotiated and established between the FAA and helicopter industry operators. Such procedures endorse general operations along waterway corridors and limitations over specified areas, such as parks. These recommended guidance are published on the Helicopter Route Charts. Eight (8) metropolitan areas have established helicopter route charts. These metropolitan areas are Baltimore-Washington, Boston, Chicago, Dallas-Fort Worth, Houston, Los Angeles, New York, and U.S. Gulf Coast.

⁷⁷ Aviation Week & Space Technology magazine, “Commercial Aviation on Ropes,” September 18, 2000, pp. 46-51.

⁷⁸ Docket Comment #17 by Helicopter Association International, VA, July 24, 2000.

A related ATC comment stated “helicopter IFR operations are limited by the FAA that could otherwise offer noise abatement operations.”⁷⁹ IFR flight was not established as a noise reducing operational mode but as an operational airspace utilization mode. The principal ATC priority is to uphold safety considerations while minimizing delays in aviation system. This gives greater priority to large fixed-wing transports that move more passengers and require higher operating speed within the airspace. Helicopters are relatively slower and carry few passengers. To avoid conflict with IFR fixed-wing aircraft, helicopters have an alternative flight profile of flying to high altitudes in visual flight rules/uncontrolled condition (VFR/UNC) airspace. This helicopter alternative averts slowing down large transports aircraft and decreases demand on the ATC system.

14 CFR part 91 regulations - General Operating and Flight Rule

FAA regulations addressing helicopter ATC procedures are specified in the Part 91 for “Air Traffic and General Operating Rules.” Presently, in Part 91 under Subpart I- “Operating Noise Limits,” noise regulations are specified primarily for fixed-wing transport aircraft and do not address helicopters and small airplanes.

5.2 Law Enforcement and Other Public Emergency Services

Law enforcement operations support air patrol for crime prevention of highways and communities, crowd control observation, and immediate response to ground base officers. The needs of law enforcement, like many specialized public services, operate over extended business hours if not around the clock 24 hours a day. For example, one California helicopter police unit responded that it operates daily from 7:30 a.m. to 3:00 a.m., except weekends when it operates from 5:00 p.m. – 3:00 a.m. “Establishment of altitude restrictions beyond safety requirements could **seriously** inhibit the conduct of airborne law enforcement operations,” as expressed by a law enforcement respondent.⁸⁰

Several other public emergency services, such as fire fighting and EMS, employ the helicopter’s versatility to provide critical life saving and time sensitive operations. One service provider of emergency medical transportation systems and services has served an estimated 200,000 missions among 40 hospitals across the country.⁸¹

In the Federal Register notice, scoping questions (in Section 4.2) were proposed to assess helicopter noise concerns by functional type of operations. Respondents recognized role of law enforcement helicopters. This sentiment was also expressed for other emergency services, including medical, fire fighting and limited specialized public services. Such services are regarded

⁷⁹ Docket Comment #17.

⁸⁰ Docket Comment #1 by Ontario Police Dept., CA, July 5, 2000.

⁸¹ Docket Comment #78 by Air Methods, CO, September 14, 2000.

as vital community needs.^{82,83} FAA concurs and recommends that these public services be exempt from any consideration of proposed ATC procedures that would otherwise impose operational limitations.

⁸² August 16, 2000 Public Workshop Transcript #1.

⁸³ October 20, 2000 Public Workshop Transcript #2.

6.0 Consideration of Views (Public/Industry Comments)

In this section, the primary issues of concern are identified and reviewed based upon the public comments received. They are assessed with regard to technical merit (safety and effectiveness) and applicability within statutes, laws and regulations. The issues are broadly categorized either as operational, relating to aircraft/airspace operational issues, or non-operational. Operational issues are further grouped and discussed in context with the appropriate FAA regulation. Each issue is individually discussed to examine the potential for noise mitigation benefits.

6.1 Operational Issues

Five operational issues were identified that relate to “General Operations and Flight Rule” specified under 14 CFR Part 91. These operational issues are: 1) minimum altitudes, 2) noise sensitive route and design guidelines, 3) hover duration time, 4) retirement of noisiest helicopters, and 5) visible identification markings requirements. Preceding the discussion is a brief description of the Part 91 regulation.

Part 91 Regulation

Helicopters have unique VTOL capability that allows them to operate at variable altitudes, low speeds, and hover. The helicopter’s versatility is well established in public services such as law enforcement, EMS, fire fighting missions, and heavy lift. In many cases, these operations are highly warranted and only viable by helicopters.

Except during takeoff and landing, Section 91.119 mandates that, when flying over congested areas, aircraft maintain an altitude of at least 1,000 feet above the highest obstacle and a horizontal radius of at least 2,000 feet from another aircraft. In other than congested areas, aircraft are required to maintain an altitude of at least 500 feet above the surface over open water or sparsely populated areas. Over open water or sparsely populated areas, aircraft may operate at less than 500 feet above the surface, provided that they do not fly closer than 500 feet to any person, vessel, vehicle, or structure.

Helicopters may be operated at less than these minimum altitudes provided that they are conducted without hazard to persons or property on the surface.

In comments received, several respondents recommended that Section 91.119 be amended to establish a minimum flight altitude for helicopters similar to that for fixed-wing airplanes. Such a change would require that helicopters in urban areas maintain an altitude of 1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet of the helicopter. One respondent stated that public safety helicopters should be exempted from the minimum altitude restriction.

6.1.1 Minimum Altitude for Overflight and Hover

The noise reduction solution suggested by the majority of the respondents proposed the establishment of a minimum altitude AGL regulation for helicopters. The solution was contained in 64 responses, or 52 percent of the total number of responses received, and was the most prevalent recommendation. Minimum flight altitudes were suggested in 18 responses (see Table 1), with the majority suggesting a minimum altitude above ground level ranging from

1,000 to 2,000 feet. Neither the police department respondent nor the helicopter industry respondents were in favor of this regulatory solution.

A similar noise reduction solution suggested by five respondents proposed the establishment of regulation limiting the allowable maximum sound pressure level (SPL) on the ground. Such an approach can serve to standardize the noise impact threshold on ground observers. One respondent suggested that this approach would be more customary and consistent with existing noise ordinances for other ground-based noise sources like cars, radios, and human disturbances. Three respondents propose this approach principally be implemented for noise sensitive areas, such as hospitals. Two respondents proposed it applicable for all helicopters. Individual helicopter models generate different noise level. As such, the establishment of a noise level on the ground becomes a function of overflight altitude. So noisier helicopters would be required to fly higher to maintain the same noise level emitted to the ground.

Both suggested solutions apply relative altitude or stand off distance as the primary mechanism for attenuating the noise. By establishing a fixed minimum altitude to limit overflight operations spatially over the public, noise levels are likely to fall. Different model helicopters generate different noise levels. Depending on the absolute minimum altitude selected, the noise from different helicopters, although lower in level, may still vary by the ground observer's perception. By prescribing a noise limit on the ground, conceptually the perceived noise reduction becomes a constant allowable noise level with the variability imposed on the helicopters operational altitude. In practice it would place the onus on the aircraft manufacturers to noise test and identify the relative minimum altitude or stand off distance that satisfies the established SPL_{max} criteria on the ground. Both concepts require further research to assess the noise benefits and establish as operational process, procedures, and/or regulation.

Noise reductions are achieved by operating at greater altitude for overflight. This is supported by historical helicopter noise measurements (Newman et al. (1979)) and the present urban *in-situ* noise measurements. Notwithstanding the noise benefits, instances of heavy traffic volume in complex urban airspace regions may trigger an overriding recognition for greater aircraft separation distance for safety. To preserve separation, ATC may accede to alter its priority and limit higher altitude helicopter flight in lieu of the voluntary high altitude low noise flight alternative. Any new procedures or redesign of airspace will require integration of a "keep aircraft high" philosophy. The challenge to optimize airspace utilization continues. Changes can potentially affect other areas of the NAS. Any proposed procedural changes will receive careful consideration and will require testing for feasibility prior to implementation.

6.1.2 "Noise sensitive" Routes & Routing Guidelines

Aviation routes are established to provide for safe and efficient flow of air traffic. The FAA attempts to establish routes over non-noise sensitive areas. It is not practical for aircraft to avoid overflights of some residential communities between their point of departure and destination. This issue is more pronounced for helicopters as most heliports and vertiports are situated within densely populated areas with limited real estate to buffer noise. Forty-six (38 percent) of the respondents recommended changes to the routes flown by helicopters in urban areas. The most

frequent recommendation (21 respondents) was that helicopter flight be directed away from residential areas. Some of the respondents suggested that preference be given to helicopter flight routes over commercial and industrial areas. It was also recommended that careful analysis be made of land uses with comments requested from the affected communities prior to the designation of specific flight routes.

The FAA helicopter route charts for several urban areas show helicopter routes along major highways. Respondents disagreed with this approach because of the potential concentration of helicopter noise in residential areas. One respondent specifically called for helicopter routes that were more spread out. Respondents from urban areas along major rivers recommend that actual helicopter operations be flown over the river center rather than along the riverbanks.

One respondent recommends that VFR routes be reexamined, as they have not always been chosen with environmental considerations. The revisions should take into account requirements for high angle-of-bank turns that cause increases in noise level.

The respondents state that routes should be mandated and the rules enforced. They claim that voluntary compliance does not work. It is generally accepted that emergency services be exempted from flight route restrictions.

Identification of optimum helicopter route planning for avoidance of noise sensitive areas should be incorporated and emphasized specifically within the overall planning and development process for an urban airspace design process. Pursuit and implementation of any proposed ATC procedure would require comprehensive evaluation in accordance with all applicable FAA orders and regulations. It would include but not be limited to the environmental and economic review processes.

6.1.3 Limit Hover Duration

Twenty-four respondents or 20 percent presented concepts for limiting hover operations. Twenty proposed limiting the time spent by helicopters in hover for specific sites. Two respondents made the general suggestions for the reductions of hover duration for all operations. Sixteen of the respondents recommended that strict time limits be imposed on the duration of hover. Two examples of such limitations are (a) no more than 5 minutes hover in any hour or (b) no hover period should exceed 2-3 minutes. Two respondents recommended an outright ban on hover operations.

Current flight regulations offer operational flexibility for helicopter operators to exercise voluntary procedures and judgment for hover operations. The FAA strongly encourages that voluntary criteria for minimum hover duration be instituted. FAA encourages operators to increase pilot awareness training for noise mitigation procedures that would include limiting hover duration where possible. Voluntary hover guidelines could state hover duration be kept to a minimum to mitigate noise over populated areas unless the hover operation qualifies as an emergency.

6.1.4 Retire Noisiest Helicopters

Sixteen respondents or 13 percent recommended that quieter helicopters be introduced in urban areas. Ten respondents called for a phased out of service or retirement of helicopters that could not meet a newly defined Helicopter Stage 3 criteria by some specified data; i.e., 2005.

The current civilian helicopter fleet is categorized as either Stage 1 or Stage 2 based upon its compliance to the noise certification limit under Part 36. Helicopters, for which application for issuance of type certificate in primary, normal, transport, or restricted category was made prior to March 6, 1986, are Stage 1. Numerous Stage 1 helicopters continue to offer a productive service that otherwise might be cost prohibitive. The suggested retirement or phase out of any helicopters would require a comprehensive study of environmental benefit and economical impact under rulemaking. Pursuit and implementation of a new Stage 3 standard would require rulemaking under Part 36. FAA would be authorized to phase out Stage 1 and Stage 2 helicopters only if through a rulemaking action it was determined economically reasonable or technically practical under 49 U.S.C. 44715.

Currently, several factors complicate the assessment of a helicopter technology “phase-out” evaluation study. These factors are: 1) the lack of comprehensive operational usage and representative flight profile data for most helicopters, 2) modeling complexity (not simply “point A to point B” flight operations as airplanes) due to helicopters dynamic operational flexibility, and 3) the lack of an up-to-date helicopter noise model database for impact assessment. Until such information and data can be established, a present “phase-out” assessment of noise is unsubstantiated. The FAA is establishing an update of the helicopter noise database with recent technology flight test measurements under the auspices of Society of Automotive Engineers 21 Committee on Aircraft Noise.

6.1.5 Visible Identification

Seventeen respondents or 14 percent suggested that helicopters be prominently marked with visible identification that is readable by ground observers. Concepts proposed consider utilizing the existing N-numbers issued by the FAA, or other identifiers, placed on the belly of the helicopter. Lights were also recommended for identification luminescent at night. The discrimination of police, fire, and other emergency helicopters users was proposed. It called for a flashing blue light installed beneath the helicopter. This is similar to sirens on fire trucks for public acknowledgement, safety, and avoidance. The suggested markings and visual identification proposals sought the identification of helicopters causing negative noise impacts or violating any regulatory flight procedures.

Most helicopters are not appreciably sizable in surface area to display a far-visible, distinctive identification. Some helicopters can be visually recognizable due to unique commercial painted designs used primarily for advertising recognition. Although aircraft are required to display a registration number, the mark display requirements, as specified 14 CFR Section 45.29, ranges from 2 to 12 inches in height. The relatively small sized mark display can result in limited long distance recognition. A more fundamental limitation of this approach includes no guarantee that the helicopter of concern will operate within a reasonable relative distance or line of sight.

Land Use/Access

Three operational issues were identified with relationships to “Airport Land Use Planning Compatibility/Airport Noise and Access Restrictions” specified under Part 150/161. These issues are frequency of operations, time frame of operations, and topics associated with heliports/airports (i.e., ground run-up duration). Also presented is the aim of noise abatement procedures. The background leading to Part 150 and Part 161 regulations is briefly discussed.

Part 150/161 Regulations

Proposing to minimize number of aircraft operations and establish a curfew of operational time frame implies airport/heliport access and usage restrictions. These measures are within the interest of the airport operator. Airport access and use restrictions include such topics as hours of airport operation, types of aircraft allowed to utilize the airport, and limits on number of aircraft operations or passenger enplanements. However, the FAA restricts airport operators from establishing policies which impact safety that are unreasonable, unjustly discriminatory, impose an undue burden on interstate commerce, or interfere with Federal regulations.

Background

The FAA has provided technical and financial support for airport noise compatibility planning since 1976. The 1976 Aviation Noise Abatement Policy encouraged airport proprietors and others to consult with FAA about their plans and proposals and to suggest innovative ways to meet the noise problem in their communities. Airport proprietors were encouraged to consult and review proposals to restrict use with airport users and the FAA before implementation.

In 1979, Congress enacted the Aviation Safety and Noise Abatement (ASNA) Act to encourage airport operators to adopt noise abatement plans on a voluntary basis and to provide Federal grants-in-aid for approved plans. This voluntary program was enacted through FAA’s issuance of Federal Aviation Regulation Part 150 “Airport Noise Compatibility Planning.” ASNA directed the FAA to establish by regulation a single system for measuring aircraft noise exposure, to identify land uses that are normally compatible with various noise exposure levels, and to receive voluntary submissions of noise exposure maps and noise compatibility programs from airport proprietors. Based on the noise exposure maps, strategies are developed and evaluated to reduce noise exposure and non-compatible land uses around an airport.

In 1990, the Airport Noise and Capacity Act (ANCA) was enacted partly in recognition of growing constraints that local airport noise and access restrictions were imposing on the national aviation system. The ANCA affirmed pre-existing law obligating airport operators to not impose restrictions that would, among other things, place an undue burden on interstate or foreign commerce or the national aviation system. In 1991, the FAA established Federal Aviation Regulation Part 161 “Notice and Approval of Airport Noise and Access Restrictions,” to implement the requirements under ANCA relating to airport restrictions. Part 161 established requirements for notice, analysis, and review of local Stage 2 aircraft restriction proposals and notice, analysis, and Federal approval of Stage 3 aircraft restriction proposals. The FAA determined that Part 161 should cover operations by all Stage 2 aircraft, including those weighing less than 75,000 pounds that were not subject to the Stage 2 “phase out” requirement.

Part 161 also applies to proposals to restrict operations by helicopters that are certified as Stage 2. Part 161 applies to federally funded airports and heliports or those that plan to seek Federal funding for development projects.

Noise or access restrictions are defined in Part 161 as restrictions affecting access or noise that affect the operations of Stage 2 or Stage 3 aircraft, such as limits on the noise generated on either a single event or cumulative basis; a limit on the total number of aircraft operations; a noise budget or noise allocation program that includes Stage 2 or Stage 3 aircraft; a restriction imposing limits on hours of operations; a program of airport-use charges that has the direct or indirect effect of controlling airport noise; and any other limit on Stage 2 or Stage 3 aircraft that has the effect of controlling airport noise. The rule does not apply to aircraft operational procedures that must be submitted for adoption by the FAA, such as preferential runway use, noise abatement approach and departure procedures and profiles, and flight tracks. Other noise abatement procedures, such as taxiing and engine run-ups, are not subject to Part 161 unless the procedures imposed limit the total number of aircraft operations, limit the hours of aircraft operations, or affect aircraft safety at the airport or heliport.

For Stage 2 aircraft, Part 161 requires that airports provide a cost-benefit analysis concerning proposals to restrict operations and a public notice and opportunity for comment. The analysis must include costs and benefits of the proposal, a description of alternative measures considered, and comparative cost-benefit analyses of these alternative measures. The notice and analysis required must be completed at least 180 days prior to the effective date of the restriction, with a minimum 45-day comment period.

ANCA provides a regulated means through which airport operators, users, and communities could work together to reach solutions which would reduce incompatibility of airport-generated noise with sensitive land uses while ensuring that the airport's role in the national aviation system is not jeopardized. The FAA also encourages airport proprietors to seek to enter into voluntary agreements with users. Voluntary agreements are not subject to ANCA and may include agreed-upon enforcement mechanisms that are consistent with Federal law.

6.1.6 Frequency of Operations

The 36 respondents (or 30 percent of the total comments) recommended limiting the frequency or number of helicopter operations. This issue also encompasses the suggestion for pooling helicopter utilization to reduce number of flight operations. These recommended solutions cover a wide range of options, including, in an increasing order of severity:

- (a) Limiting the number of ENG and traffic helicopters;
- (b) Reducing the number of operations by Sightseeing (SS)/tour and ENG helicopters;
- (c) Permitting ENG helicopters only for specific events;
- (d) Eliminating SS helicopters;
- (e) Eliminating SS helicopters, and reducing the number of ENG helicopters;
- (f) Eliminating SS and non-essential flights;
- (g) Permitting only emergency operations; and

- (h) Banning all helicopter flights over densely populated areas.

Such proposals to limit, ban, or eliminate the frequency or number of helicopter flights require federally funded airport/heliport operators to comply with Part 161 procedures for implementing restrictions. Such restrictions must establish claim that it would not affect aircraft safety, be unjustly discriminatory, impose an undue burden on interstate commerce, or interfere with Federal regulations.

6.1.7 Time Frame of Operations

Twenty-six respondents or 21 percent proposed instituting helicopter operational curfews. In some cases the curfews were proposed in a general sense without specificity of function of operator. In other cases, the proposed curfews were restricted to either SS or ENG operations or to both. Seven respondents recommended specific curfew time frames. The proposed starting time for a curfew ranges from 9:30 p.m. to 11 p.m. and the proposed ending time is either 7 a.m. or 8 a.m. It was suggested that exemptions be permitted for emergency flights or flights with special justification.

The more stringent proposal specified SS flights operations only from 12 noon to 5 p.m. on weekdays with a total ban during weekday nights and during the entire weekend. All other operations are limited to daylight hours with one recommendation that there be no corporate operations after 6 p.m. on weekdays and no operations on weekends.

Similarly, such proposals to limit helicopter time frame of operation requires federally funded airport and heliport operators to comply with Part 161 procedures for implementing restrictions. Such restrictions must establish claim that it would not affect aircraft safety, be unjustly discriminatory, impose an undue burden on interstate commerce, or interfere with Federal regulations.

A prototype system for aircraft tracking and management of low altitude air traffic in an urban area was demonstrated during the 1996 Centennial Olympic Games in Atlanta, Georgia. Under Operation Heli-STAR (Helicopter Short-Haul Transportation and Aviation Research), a Heli-STAR tracking system was tested in the proof-of-concept evaluation of National Aeronautics and Space Administration's (NASA) AGATE Advanced General Aviation Transportation Experiment Program requirements and temporarily utilized to allow cargo hauling operations of time critical goods.⁸⁴ The ADS-B (Automatic Dependent Surveillance-Broadcast) tracking system demonstrated a promising technology that could offer a VFR tracking solution to support the concerns of this study. More R&D investment is required to prepare and fully demonstrate the system for commercialization and field implementation.

6.1.8 Airports and Heliports

Eighteen respondents or 15 percent addressed the operation of helicopters in the neighborhood of airports and heliports. The recommendations covered a wide range of options:

- (a) Curfews for arrivals and departures;

⁸⁴ Stephen T. Fisher *et al.*, "Operation Heli-STAR – Summary and Major Findings," DOT/FAA/ND-97/9 Report, September 1997.

- (b) Prescribed arrival and departure routes;
- (c) Limits on the number of helicopters based at an airport or heliport;
- (d) Limits on the number of helicopter operations at an airport or heliport;
- (e) Noise abatement procedures for takeoff and landing at an airport or heliport;
- (f) Restrictions on ground operations such as idling and run-up time for helicopters and limitations on pilot training time; and
- (g) FAA rules to allow local government to restrict or ban the placement of helicopter landing and takeoff facilities in urban areas.

One respondent addressed the use of IFR and GPS for helicopter operations at heliports in lieu of ground-based precision approach aids. It was further recommended that the FAA develop, and implement, GPS point-in-space approaches to heliports and GPS IFR departure procedures that recognize the full range of helicopter operational capabilities.

Once again, such proposals to limit airport/heliport operations require federally funded airport and heliport operators to comply with Part 161 procedures for implementing restrictions. Such restrictions must establish claim that it would not affect aircraft safety, be unjustly discriminatory, impose an undue burden on interstate commerce, or interfere with Federal regulations. Concerns regarding idling and run-up time for helicopters may not require compliance with Part 161 if it does not affect total number of hours of operations or affect aircraft safety, but are addressed through voluntary operational guidance of noise awareness pilot training.

6.1.9 Noise Abatement Procedures

Noise abatement procedures are designed to lessen the impact of aircraft noise on communities. These procedures depict or describe geographic areas to avoid, approach and departure paths to follow, or limit direction to certain times of day. Noise abatement procedures may also specify rate of climb, altitude restrictions, or power settings. They may provide techniques for ground operations such as use of reverse thrust, reverse thrust back-ups, and maintenance run-ups. The FAA ensures that ATC personnel are cognizant of and do not issue control instructions contrary to noise abatement procedures to the extent they do not impact aircraft safety or air traffic efficiency. Airport sponsors are responsible to ensure pilot compliance with these measures.

Two operational issues were identified with relationships to “Noise Standards: Aircraft Type and Airworthiness Certification” specified under Part 36.

Part 36 Regulations

Under Part 36, Noise Standards: Aircraft Type and Airworthiness Certification, noise certification regulations for helicopters are in subpart H with references to Appendix H, Noise Requirement for Helicopters, and Appendix J, Alternative Noise Certification Procedure for Helicopters. It directly addresses limiting allowable noise levels by setting certification noise limits based on achievable noise reduction and aviation technology and reasonable economic basis. Under the noise certification process, helicopters must demonstrate under strict standards

and test procedures that its worst case maximum noise emission can satisfy established noise limit requirements prior to aircraft production or modification for operations. Helicopters that

demonstrated noise levels, at or below the set limits, are in noise compliance and are subject to satisfying applicable airworthiness regulations.

6.1.10 Helicopter Stage 3 limits

Sixteen respondents or 13 percent recommended a requirement that only quieter helicopters may operate in urban areas. In some cases, the recommendation was made in general terms for all operations and unspecific to only urban areas. Ten respondents made specific reference to the categorization of helicopters into Stages 1, 2, and 3 in a manner similar to fixed-wing airplane usage. Two respondents recommended setting new quieter helicopters standards and termed them Stage 4 for helicopters. Internationally, aviation environmental policy is heavily stressing noise stringency (strict limitation on noise) and actively pursuing harmonization of international noise guidelines. The United States is a leading member of ICAO and participates in continued harmonization of noise regulations in the preservation of environmental concerns. Under the Fifth Session of the Committee on Aviation Environmental Protection (CAEP5), a proposal to increase stringency of ICAO Annex 16 noise guidelines for helicopters was adopted within the ICAO steering committee. Proposed stringency would affect the existing regulations by reducing noise limit curves: -4.0 dB for overflight, -3.0 dB for takeoff, and -1.0 dB for approach conditions. Consistent with ICAO council approval, the FAA will promulgate the stringency proposal for U.S. regulatory adoption under 14 CFR Part 36.

6.1.11 Source Noise Reduction (hushkit?)

Three respondents or 2 percent recommended reduction of helicopter noise at source. Some noise reduction is achievable by retrofitting existing helicopters either with a “quiet cruise kit” (response #16) or the installation of a “hushkit” (response #21)^{85,86}. In general, respondents identified the need for the development of quieter helicopters and the phasing out of noisier helicopters.

Presently, helicopter “hushkits” do not exist in a generic retrofit process like that of fixed-wing aircraft “hushkits.” Yet, Vertical Aviation Technology, Inc., successfully retrofits a vintage Sikorsky S-55 helicopter primarily for noise reduction. The noise reduction methods applied are uniquely helicopter model dependent and cannot simply be applied to all types of helicopters. The retrofit cost and market demand has not stimulated the larger manufacturers’ technology investment. Major manufacturers find it much more cost effective to build the noise technology into new aircraft rather than retrofit existing aircraft. The \$10 million invested by Vertical Aviation Technology Inc. was very specifically aimed at meeting the sightseeing/tour operator needs. This was in anticipation of the impending noise restrictions in national park areas being proposed.

Investments and implementation of noise reduction technology has not completely been a recognized priority by all manufactures. Internationally harmonized requirements for stricter

noise certification regulation will compel implementation of noise reduction technology. More aggressive manufacturers are promoting their development of quieter helicopters in the market

⁸⁵ Docket Comment #16: by Bell Helicopter Textron Inc., TX. July 24, 2000.

⁸⁶ Docket Comment #21: by Whisper Jet Inc., FL. July 25, 2000.

place. Public recognition for advocating “quiet” helicopters and consumer/operator awareness is gradually changing the buyer/operator “lowest purchase price” paradigm for helicopter to one of community friendly/environmentally compatibility. The U.S. helicopter industry highly recommended the infusion of Government basic research and development funding for “quiet” rotorcraft technology to equally compete with foreign entities.

6.2 *Non-operational Issues*

In the following, non-operational issues are presented. These are issues not mutually exclusive but are, rather, interrelated. Note that military helicopter operations are not addressed because they are outside of the scope of this mandate.

6.2.1 *Voluntary Rules*

There is consensus among individual respondents, homeowners’ associations and citizens’ associations that voluntary restrictions on helicopter operations in urban areas do not work. However, respondents from helicopter operators’ associations dispute this conclusion. Eastern Region Helicopter Council of operators has quoted examples where New York City route changes to mitigate noise exposure on residents have resulted in complaint reductions. The helicopter operators also referred to their “Fly Neighborly” as an effective voluntary program to minimize noise levels in urban communities.

For helicopters, special voluntary routes are established making full use of the VTOL operating characteristics that would otherwise constrain flight corridors due to miss matches in speed criteria with fixed-wings. Although use of these routes is not mandatory, it is recommended by FAA for its mutually established benefits, i.e., avoidance of noise sensitive areas and reduction in general flight corridor traffic.

6.2.2 *Pooling of Operations*

Twenty-two respondents or 18 percent suggested that there be pooling of ENG helicopters so that there is only one helicopter flying to cover a particular event. Television and radio stations would share the signal transmitted from that pool helicopter. The responses ranged from recommendations of voluntary participation to recommendations of mandatory regulations.

With specific application to the reporting of traffic problems, it was recommended that ground-based systems be used instead of ENG helicopters for the reporting of traffic problems; i.e., cameras installed along the freeways by Caltrans in Southern California.

Pooling of operations, specifically of ENG helicopter operations, is a concept targeted at limiting the number of operations which could reduce the frequency (number) of noise events and accumulation (amplification) from multiple helicopters simultaneously operating at the same event and concentrated airspace.

Although outside of the FAA purview, one suggestion is that business incentives for “pooling” ENG helicopter operations among operators be considered. By pooling ENG operations, it reduces the noise that otherwise is generated by multiple operations covering the same incident. Such a proposed program is encouraged for state/city governments and/or local municipalities and businesses desiring to retain ENG operations while also mitigating noise for their area.

6.2.3 Exempt Law Enforcement and Emergency Medical Services

For the noise reduction alternatives suggested, several could inhibit public service helicopter operations. However, the public expressed supported for exemption from noise restriction alternatives for services in performance of emergency operations. Yet, they still recommended adherence when operating in a non-emergency response condition; i.e., returning to base station.

As a specific concern outlined under the mandate, the discussion regarding law enforcement and EMS is given in Section 5.2, Law Enforcement and Other Public Emergency Services.

6.2.4 VFR and IFR Operations

The helicopter industry recommends that the FAA revise current VFR corridors and checkpoints to minimize noise exposure in urban areas. They also seek that ATC be more aggressive in assigning helicopter flight altitudes for minimum noise whether or not requested by the helicopter flight crew. In addition, the FAA and ATC should develop a better understanding of the helicopter noise problem in urban areas and devise better techniques and training with respect to the unique characteristics of helicopters.

The helicopter industry also recommends that the FAA develop easier access for helicopters to the IFR system with approach and departure capability to and from the actual heliport facilities. It was stated that the changes would eliminate the current lower altitude VFR transitions between the current heliports and the IFR access points. The operators project that there would be higher use of the IFR system by operators that currently opt for lower altitude VFR operations rather than face the delays and uncertainties of the current IFR environment.

Further discussions regarding the VFR,UNC, and IFR operations are addressed in more depth in Section 5.0, Helicopter Air Traffic Control Procedures.

6.2.5 Airspace Control

Local legislative and city authorities commented on requesting authority for determinations of noise and airspace control decisions. However, Federal law outlines the FAA as the agency with jurisdiction and responsibility for airspace control with necessary adherence to environmental policy.

One commenter summarized FAA's options to regulate helicopter traffic and stated that, regardless of whether the best solution is to turn control over to state and local governments or to the FAA to impose strict controls, thousands of urban residents are awaiting a comprehensive and well-reasoned environmentally responsible document. In the past, FAA has worked with local communities and helicopter operators in the New York area and other areas of the country to establish memoranda of understanding designating voluntary noise abatement routes and

procedures, such as for helicopter sightseeing in the vicinity of the Statue of Liberty. FAA is willing to continue to facilitate voluntary solutions to address community concerns. While the FAA's exclusive statutory responsibility for noise abatement through regulation of flight operations and aircraft design is broad, the noise abatement responsibilities of state and local governments through exercise of their police powers are circumscribed. Local governments are

currently preempted from regulating overflights, in part because of the national need for uniform regulation of the navigable airspace. A patchwork quilt of state and local government airspace regulations would impose an undue burden on interstate commerce. State and local governments play a critical role in protecting their citizens from unwanted noise using their powers of land use control. FAA continues to study the issue in order to abate aircraft noise to protect public health and welfare.

6.2.6 Military Helicopters

Military helicopters were specifically excluded from the current study. However, several respondents observed that the general public could not differentiate between civilian and military helicopters. Military helicopters flying over urban areas are usually performing transit operations that are similar to those performed by civilian helicopters. Thus, respondents recommended that military helicopters be included in the study.

Military helicopters utilize the same airspace system, making it difficult to determine the influence the sector that contributes to the public's disturbance. Many military helicopters are not designed to civil noise standards in order to satisfy stringent mission performance requirements. In the long term, it would be beneficial for both sectors, civil and military, to resolve such issues mutually for any future noise solutions to be more effective (and possibly more economical). One proposal is that the Department of Defense consider assimilation of civil noise standards for military rotorcraft in order to address noise reduction in a unified national strategy that mitigates noise from all types of helicopter operations.

Technology Research Initiatives

Respondents identified several topics for further research to better understand the impact of helicopter noise on residents of urban areas and to foster the development of quieter helicopters.

6.2.7 Socio-Acoustic (Psycho-Acoustic) Survey

Ten respondents or eight percent, inclusive of the helicopter industry's support, recommended that a socio-acoustic survey of the people living and working in urban communities exposed to helicopter noise be conducted. The survey should include determination of the types of operation and the noise characteristics that the public find annoying. "Psycho-acoustic" experts in the field of environmental health should design it. Public comments encouraged that any implemented noise methodology be subject to peer review by members of the scientific and medical communities to ensure that it is unbiased. The results of the survey would be used in the development and implementation of methods to reduce the effects of helicopter noise in urban areas. Socio-noise author Professor Bronzaft recommends that Congress consider allocation of funds to support a multi-year, socio-acoustics study at an approximate cost of \$150,000 annually to capable universities.⁸⁷

6.2.8 Flight Tracking and Noise Monitoring System

Workshop respondents raised the concern the FAA does not formally track number of operations, normally considered by takeoffs and landings, for helicopters as well as overflights through a given area. This concern was incited in the acceptance of quantifiable helicopter

⁸⁷ Communications with Bronzaft, 2000.

statistics that are currently retained by operators. Communities argued this information was unreliable, without through traffic noise effects and biased, when seeking to gauge noise impact. Hence, recommendations were made for the FAA to track helicopter operations and also perform noise monitoring to quantify the impact, in particular, for specific noise sensitive sites such as parks, hospitals, and neighborhoods.

The FAA does not formally track the number of helicopter operations (takeoffs and landings) nor does the FAA actively monitor noise in metropolitan areas. No process exists for tracking VFR flights below radar controlled airspace. For helicopter operations within the ATC controlled airspace, the radar tracking system records such approved operations. The current VFR procedures are structured for independent operational tracking that helicopters greatly utilize given their vertical short takeoff and landing capabilities. The priority for tracking focuses primarily on IFR controlled airspace and commercial transport operations. The FAA main priority is dedicated to maintaining the IFR system functions. FAA has limited infrastructure tracking resources and budget to expand capabilities to VFR operations.

6.2.9 Global Positioning System approach/departure Noise Abatement Technology

“Spin-off” GPS technology, from an effort to improve radar guided landing and takeoff operations for bad weather, holds the prospect of mitigating noise. By prescribing approach and departure profiles using GPS guidance technology, helicopters can be flown or directed to avoid the high noise generating aircraft states or minimize operations through them.

Under NRTC/RITA activities, preliminary research and testing has indicated the promise of reducing approach noise. However, further development is required to validate a commercially viable system. This new technology offers another alternative for enhancing the capability of operational noise abatement procedures.

6.2.10 Improved Helicopter Noise Metric

Several respondents claim that there is no adequate metric for measuring the response of humans to helicopter noise. Studies indicate the metrics developed for airplane noise are not completely adequate for helicopters. There is a need for further development of appropriate annoyance metric with improved correlation for helicopters.

As discussed in “effects on individuals” (Section 3), there are multiple noise metrics utilized to assess noise (EPNL, ASEL, DNL, etc). However, civil helicopter annoyance assessments utilize the same acoustic methodology adopted for airplanes with no distinction for helicopter’s unique noise character. As a result, the annoyance of unaccustomed, impulsive helicopter noise has not been fully substantiated by a well-correlated metric. The FAA favors the chartering a technical effort to focus on low-frequency noise metric to evaluate helicopter annoyance.

6.2.11 Quieter helicopters

Recommendations were made that helicopter manufacturers be encouraged to design quieter helicopters. FAA, NASA, and industry agree it could only be accomplished through stable continued funding of the joint research programs.

Unlike fixed-wing aircraft that benefited from the leap from jet to turbofan technology, helicopter noise reduction technology has not achieved comparative orders of noise reductions. Much of the R&D returns has come from improved understanding and identification of physical mechanisms and phenomenon modeling, such as BVI noise and HSI noise occurring during approach and high speed cruise. Studies have identified “noise reducing” design trades and concepts such as increasing number of blades, reducing tip speed, thin blade tips, high technology airfoils, and a variety of other parameters. Presently, stiff international competition and greater environmental sentiment are making manufacturers more cognizant of their need to invest and implement “quiet” technology into helicopter design.

Noise database

The FAA continues to work with NASA and the aviation industry to identify and create aggressive research programs. There is a strong global awareness for engineering innovations in “quiet” technology for aircraft now and in the future. With the completion of the Advanced Subsonic Technologies Program, many of the concepts await an overall integrated technologies demonstration. NASA has been the Nation’s leader in fostering comprehensive helicopter design methods and the establishment of noise test databases for rotorcraft. Together with the FAA, technical studies to bridge the gap between inaccuracies in helicopter predictions, when compared to measurements, require a serious resolution. Overall, the course of our Nation’s aviation noise reduction technology effort, especially for rotorcraft, must consider revitalization if significant long-term improvements for noise integration technology are to occur.

7.0 Source Noise Modeling and Sensitivity Assessment

In this section, noise measurements made to establish the helicopter source noise effects with an urban environment are presented. This is followed by a helicopter altitude-noise sensitivity evaluation to consider the benefits of operations at higher altitude.

7.1 Helicopter Source Noise Measurements in an Urban Environment



Figure 7-1. AStar Helicopter Flyby in an Urban Environment (Liberty State Park, NY/NJ)

Helicopter source noise measurements in a densely populated area were necessary to quantify the influences of helicopter noise relative to an urban setting (other noise contributions are automobile traffic, harbor ferry, people, etc.) and understand urban setting effects.

In support of the FAA, the Volpe National Transportation Systems Center Acoustics Facility (Volpe Center) conducted field measurements in the greater New York City area during the week of July 17, 2000. Although the Section 747 mandate is national in scope, the New York City area was chosen for the collection of *in-situ* acoustic data because it was representative of an urban environment exposed to helicopter operations and offered many sites suitable for the collection of such data. Measurements were primarily conducted in New Jersey's Liberty State Park (see Figure 7-2). Additionally, data were collected near one of the downtown heliports, adjacent to the Wall Street financial district. The collected data were studied to identify the urban noise effects relative to conventional common ground conditions and assessed for noise reduction/altitude sensitivities. Similar New York City *in-situ* test data and other available aircraft noise measurements were compared. FAA's Helicopter Noise Model/Integrated Noise Model (HNM/INM) was utilized to model altitude-noise attenuation effects.



Figure 7-2. Liberty State Park - Helicopter Noise Measurement Site



Figure 7-3. Digital Video-based Tracking System

During the measurements, acoustic data were collected using at least one microphone, depending on the site. Additionally, detailed aircraft position data were collected using a digital video-based

tracking system (Figure 7-3). Reduction of these data renders time-correlated X, Y, Z and velocity data for each aircraft event. As a backup to the video tracking data, redundant slant range data for the aircraft were collected via 35mm camera-based photo scaling methods as well as using laser range-finding devices. Meteorological data were collected periodically throughout the measurements.



Figure 7-4. An Urban High Density Setting

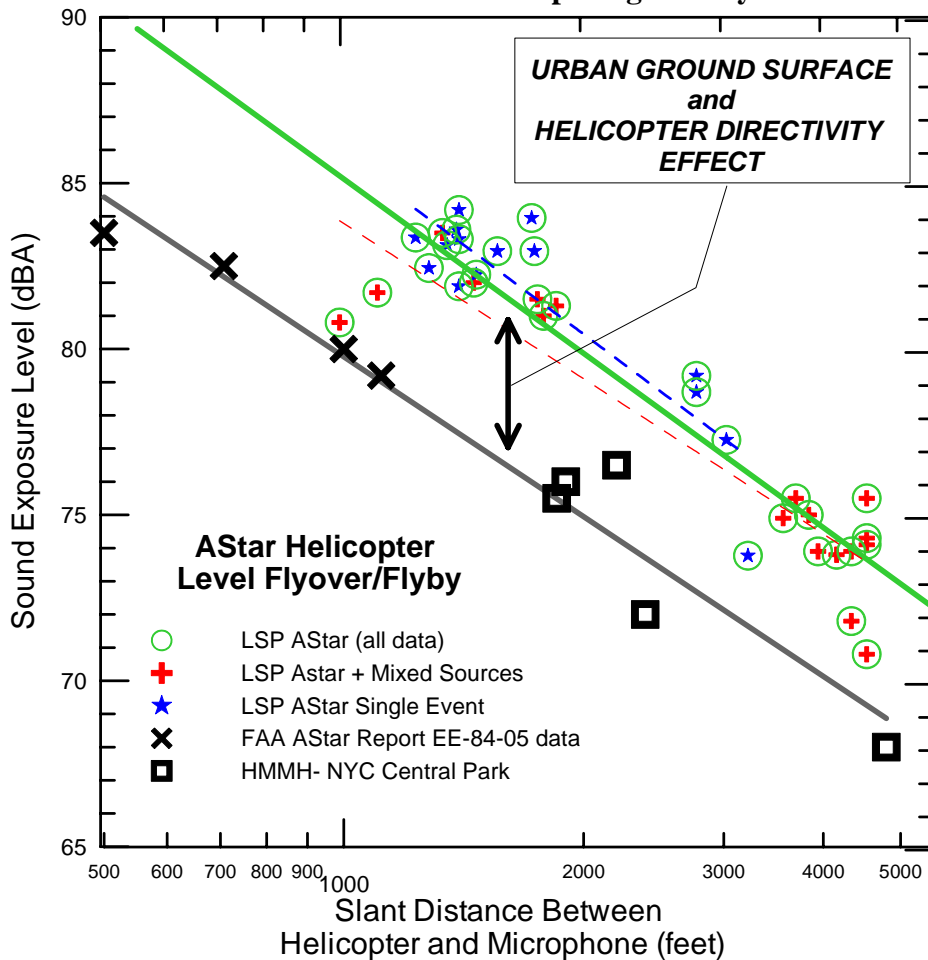
Urban Noise Results

In assessing the acoustical effects of an urban environment, noise data for different ground conditions are investigated. Measured Liberty State Park AStar helicopter noise data are compared with available AStar helicopter noise data from a non-urban setting. In Figure 7-5, SEL and corresponding distance data from Appendix G, Tables (1a) and (1b), are plotted. The single event and mixed helicopter data are depicted as circled star and plus symbols, respectively. It represents helicopter noise over hard ground conditions, characteristic of urbanization, as it was principally measured over calm water. AStar helicopter noise certification data and recent measures from the New York City Master Plan are plotted as “X” and squares, respectively. The latter data were measured over common semi-absorptive ground conditions such as cut grass. Equivalently, the New York City Master Plan noise data are from flights recorded in Central Park.⁸⁸

⁸⁸ Edwards and Kelcey Engineering, Inc., “*Heliport and Helicopter Master Plan for the City of New York*,” Final Report, March 1999.

As shown in Figure 7-5, an ASEL difference of approximately +3.5 dB exists between fitted curves for each dataset. Helicopter noise predictions with ground surface noise reflection effects by Leverton and Pike predicted the noise difference being lower than that given by the data. Based on the comprehensive ground reflection analysis, presented in Appendix G, the sound reflections due to hard ground appeared to cause an approximate +2 dB increase in noise levels relative to a semi-absorptive ground conditions. The additional +1.5 dB contribution is possibly due to the helicopter's nonuniform noise directivity that was a recognizable factor given the *in-situ* measurement situation. In Figure 7-6, the AStar helicopter noise directivity is presented in an azimuthal polar plot. It reveals the higher ASEL at the starboard side as approximately +1.5 dB greater than the port side. The *in-situ* measures distinguish directivity effects that otherwise are averaged lower by multi-microphone measurements. Other factors such as variability in altitude, airspeed, and meteorological effects contribute additional deviations of the data.

Figure 7-5. AStar Noise Measurements Comparing Liberty State Park Noise Effects



FLYOVER NOISE DIRECTIVITY

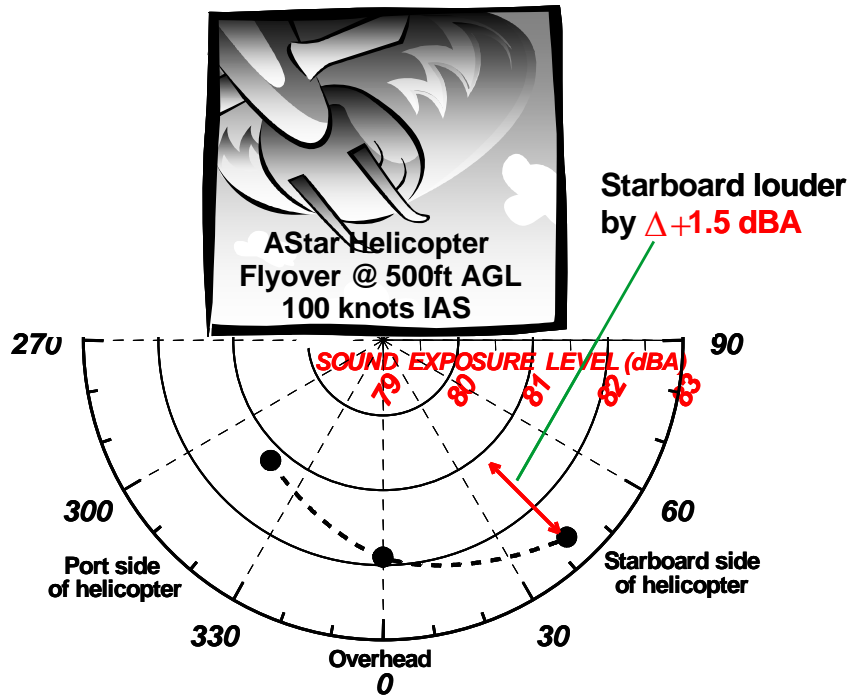


Figure 7-6. Azimuthal Noise Directivity Polar of an AStar Helicopter for 100 knot Flyovers (Ref. FAA-EE-84-05 Report)

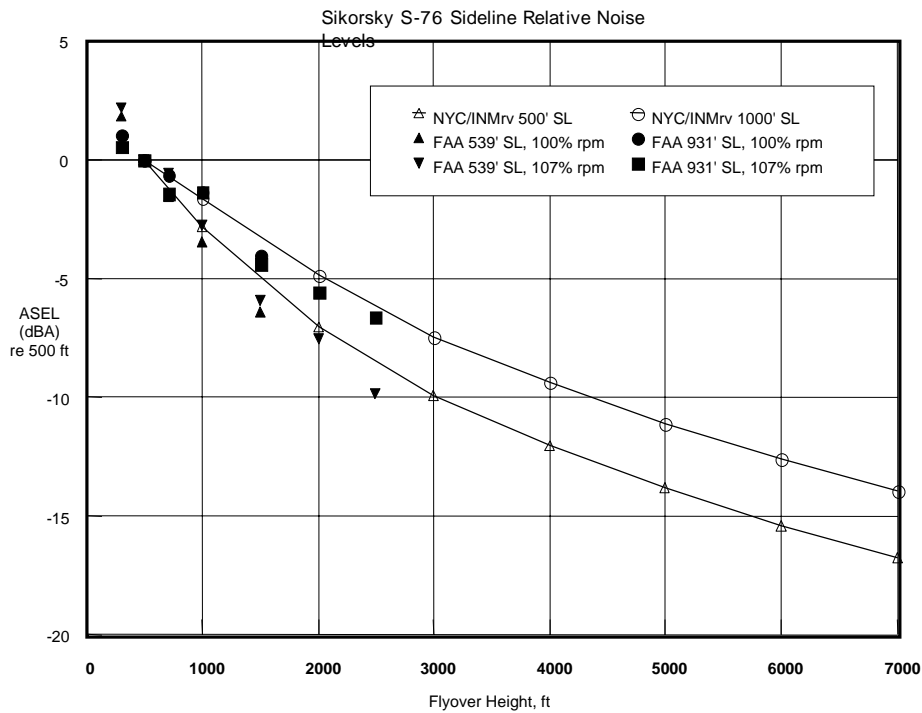


Figure 7-7. S-76 Altitude-Noise Reduction Sensitivity for Liberty State Park

The Research Version of the INM (INMrv) was utilized with Liberty State Park data to model altitude-noise reduction sensitivity effects. The details of the analysis are discussed in Appendix G. Shown in Figure 7-7, the normalized 500-foot Liberty State Park noise results, given by the solid curves, are consistent with past data for lateral sideline noise reduction with increasing altitude. It reveals the possible noise reduction benefit with increased altitude flight for the S-76 given the 500-foot or 1,000-foot lateral observers. The attenuation rates are consistent with previously documented measurements offering high confidence in the data.⁸⁹

In conclusion, an approximate +2.0 dB increase in noise is a result of the noise propagation over a hard ground condition. In this case, it was water. The *in-situ* measurement distinguishes directivity effects that otherwise are averaged lower by multi-microphone measurements. Certainly, other factors such as variability in altitude, airspeed, and meteorological effects contribute some deviation to the data. The Liberty State Park data have been checked and revalidated for repeatability. The rates of noise reduction with increasing altitude are consistent whether over common ground or in urban environment. However, the absolute levels should be adjusted to include the +2.0 dB effects of urbanization.

7.2 Altitude-Noise Sensitivity - Introduction

The most highly cited operational issue that was expressed to the FAA requested establishing a minimum altitude for helicopters. The public comprehends the benefit of reducing noise by creating a greater stand off distance and seeks minimum altitude AGL operations. However, there existed some concern that, because of excess ground attenuation effects, sideline noise levels could actually increase as helicopter altitude increased, reaching a maximum for some altitude and then eventually decrease as helicopter altitude is increased further. Several published FAA/industry helicopter noise certification databases have been reviewed in an attempt to address that concern and establish an understanding of altitude-noise sensitivity for observers under the immediate flight path.

Background

It is well known in the certification of transport category and turbojet powered airplanes that values of EPNL measured at takeoff sideline (lateral) locations have a maximum for airplane altitudes of about 1,000 feet although the maximum may not be well-defined in some cases. The explanation is that, during an airplane's takeoff roll and very low altitude lift-off, the effect of excess ground attenuation (EGA) is strongest at shallow incidence angles which contribute a reduction to the sideline noise levels. Shortly after reaching an approximate 1,000 feet altitude, the effect of EGA decreases with incidence angle and the sideline noise levels peak to maximum levels due to spherical spreading dominance. Beyond this point, the sideline noise levels decrease correspondingly with the airplane's increase in relative distance. This sequence of contributing noise effects is identified and depicted in Figure 7-8 for a large transport jet for the three segments of departure.

⁸⁹ J.S. Newman, Rickley, E. J., Bland, T. L., Beattie, K. R., "Noise Measurement Flight Test: Data/Analyses Sikorsky S-76A Helicopter", FAA-EE-84-06, September 1984.

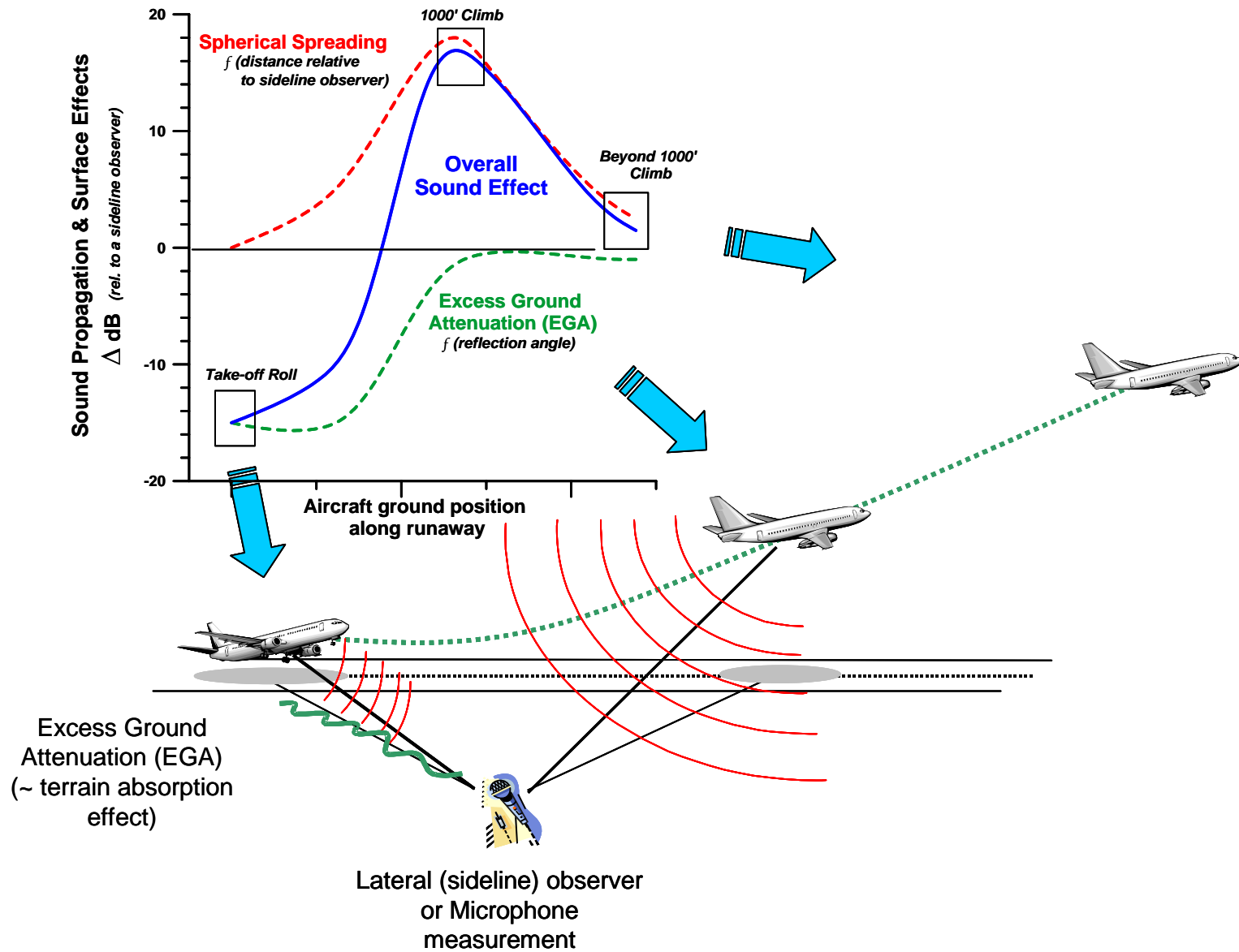


Figure 7-8. Noise Effects For Jet Transport During Departure

Helicopter Noise Database

The FAA has conducted several noise tests on various helicopter types, but most of the tests suffer from the same limitation in that the sideline measuring location is only 492 feet (150 meters) from the flight path.^{90,91,92,93,94,95,96,97,98,99,100,101} However, in one case, Newman *et al* made measurements at sideline distances of 539 feet (164 meters) and 931 feet (284 meters). Level flyovers were made at altitudes of 300, 500, 700, 1,000 and 1,500 feet (also 2,000 and 2,500 feet for some helicopters). These combinations of sideline distance and helicopter altitude give elevation angles of 29° to 70° for the 539 feet sideline location and 18° to 58° for the 931 feet sideline location. These elevation angles are greater than those associated with a typical airplane noise certification, but are at least comparable with them in the case of the 931 feet location. Thus, it might be expected that effects of ground attenuation, if any, would be observed in data measured at the 931 feet sideline location.

The measurements reported by Newman *et al* were conducted at the FAA Technical Center (Atlantic City, New Jersey), off the end of the runway. It was reported that there was a cleared circle, approximately 200 feet in diameter, of mowed grass around each microphone location. Low scrub bush and grass bordered each cleared circle. The helicopters tested were Agusta 109, Bell 206L, Sikorsky S-76, and Sikorsky UH-60A Blackhawk. In the case of the Sikorsky S-76, tests were conducted at two engine power settings.¹⁰²

Variation of Noise Level

Data from Newman *et al* are plotted in Figures 7-9 through -13 in terms of the noise level relative to the level measured for a flyover altitude of 300 feet. In some cases, sound levels measured beneath the flight path are included with the sideline data for comparison. The relative

⁹⁰ J.S. Newman, and Rickley, E. J., "Noise Levels and Flight Profiles of Eight Helicopters using Proposed International Certification Procedures", FAA-EE-79-03, March 1979.

⁹¹ J.S. Newman, Rickley, E. J., and Ford, D. W., "Helicopter Noise Definition Report: UH-60A, S-76, A-109, 206L", FAA-EE-81-16, December 1981.

⁹² J.S. Newman, Rickley, E. J., and Bland, T. J., "Helicopter Noise Exposure Curves for use in Environmental Impact Assessment", FAA-EE-82-16, November 1982.

⁹³ J.S. Newman, Rickley, E. J., Bland, T. L., and Daboin, S. A., "Noise Measurement Flight Test: Data/Analyses Bell 222 Twin Jet Helicopter", FAA-EE-84-01, February 1984.

⁹⁴ J.S. Newman, Rickley, E. J., Daboin, S. A., and Beattie, K. R., "Noise Measurement Flight Test: Data/Analyses Aerospatiale SA 365N Dauphin 2 Helicopter", FAA-EE-84-02, April 1984.

⁹⁵ J.S. Newman, Rickley, E. J., Daboin, S. A., Beattie, K. R., "Noise Measurement Flight Test: Data/Analyses Hughes 500D/E Helicopter", FAA-EE-84-03, June 1984.

⁹⁶ J.S. Newman, Rickley, E. J., Beattie, K. R., Daboin, S. A., "Noise Measurement Flight Test: Data/Analyses Aerospatiale AS 355F TwinStar Helicopter", FAA-EE-84-04, June 1984.

⁹⁷ J.S. Newman, Rickley, E. J., Bland, T. L., Beattie, K. R., "Noise Measurement Flight Test: Data/Analyses Aerospatiale AS 350D AStar Helicopter", FAA-EE-84-05, September 1984.

⁹⁸ J.S. Newman, Rickley, E. J., Bland, T. L., Beattie, K. R., "Noise Measurement Flight Test: Data/Analyses Sikorsky S-76A Helicopter", FAA-EE-84-06, September 1984.

⁹⁹ J.S. Newman, Rickley, E. J., Bland, T. L., Beattie, K. R., "Noise Measurement Flight Test: Data/Analyses Boeing Vertol 234/CH 47-D Helicopter", FAA-EE-84-07, September 1984.

¹⁰⁰ J.S. Newman, Rickley, E. J., Locke, M., "International Civil Aviation Organization Helicopter Measurement Repeatability Program: U.S. Test Report, Bell 206L-1, Noise Flight Test", FAA-EE-85-6, September 1985.

¹⁰¹ J.S. Newman, Rickley, E. J., Levanduski, D. A., Woolridge, S. B., "Analysis of Helicopter Noise Data using International Helicopter Noise Certification Procedures", FAA-EE-86-01, March 1986.

¹⁰² J.S. Newman, Rickley, E. J., and Ford, D. W.

noise levels are presented in terms of four parameters: EPNL, SEL, Maximum A-weighted Sound Level (Lmax), and Maximum Perceived Noise Level Tone corrected (PNLTM).

Each set of test data for Lmax or PNLTM has an associated (broken) curve showing the sound level decay according to spherical spreading (inverse square law). For the integrated measures (EPNL and SEL) the estimated level decay is based on the relationship $12.5\log(R_2/R_1)$, where the factor of 12.5 is the net result of adding a factor of 20 for the inverse square law and a factor of -7.5 for the duration correction as applied in Part 36.

The following observations can be made regarding the data in Figures 7-9 through -13. In no case does the noise level increase as helicopter altitude increases. Thus, if EGA is present, it is not very marked for the distances and angles involved with the tests. In most cases, the measured values of PNLTM and Lmax decrease more rapidly than is predicted by spherical spreading as helicopter altitude increases. This implies that excess ground attenuation is negligible.

Integrated measures (EPNL and SEL) show trends similar to those of the instantaneous measures (PNLTM and Lmax), but the rate of decrease of noise level as helicopter altitude increases is slower because of the duration effect.

Whether or not there is any contribution from EGA, the results show that there is only a small reduction in sideline noise level as helicopter altitude increases, until an altitude of about 1,000 feet is reached. For a sideline distance of 931 feet, the integrated noise levels are typically reduced by about 2 dB when the helicopter altitude increases from 300 feet to 1,000 feet, and the PNLTM and Lmax are reduced by about 3 dB.

Discussion

The test data indicate that helicopter sideline noise levels decrease as helicopter altitude increases, at least for sideline distances up to 1,000 feet and elevation angles greater than 18°. The data do not allow conclusions to be drawn for greater sideline distances where the elevation angle of the helicopter would be less than 18°. EGA influences fixed-wing airplane sideline noise levels under Part 36 certification conditions, where the elevation angle is between 11° and 34° (airplane altitudes of 300 to 1,000 feet). However, excess ground attenuation is applied by Newman *et al* only when the helicopter is in hover in the ground effect and the elevation angle is 0° or when the helicopter is in hover out of the ground effect and the elevation angle is near 0° (although “near” is not defined in the reference).¹⁰³ Thus, the conditions under which excess ground attenuation would have the greatest influence on helicopter noise propagation are not well defined.

While the role of EGA on helicopter noise propagation over vegetation is not completely defined by the FAA helicopter test data, the results may be indicative of conditions for flight over water. Not defined at all by these data is the effect of helicopter altitude on sideline noise levels in an urban environment with numerous buildings. Thus, the *in-situ* measurements were made as

¹⁰³ J.S. Newman *et al*, FAA-EE-82-16, November 1982.

discussed in Section 7.1, Source Noise Modeling and Sensitivity Assessment, and in Appendix G, *In-situ* Urban Helicopter Noise Measurements (New York City).

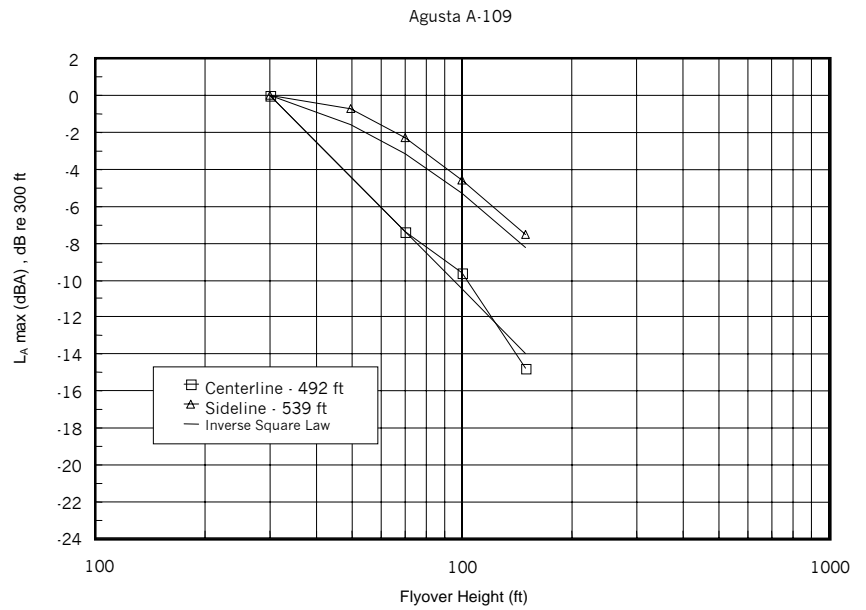
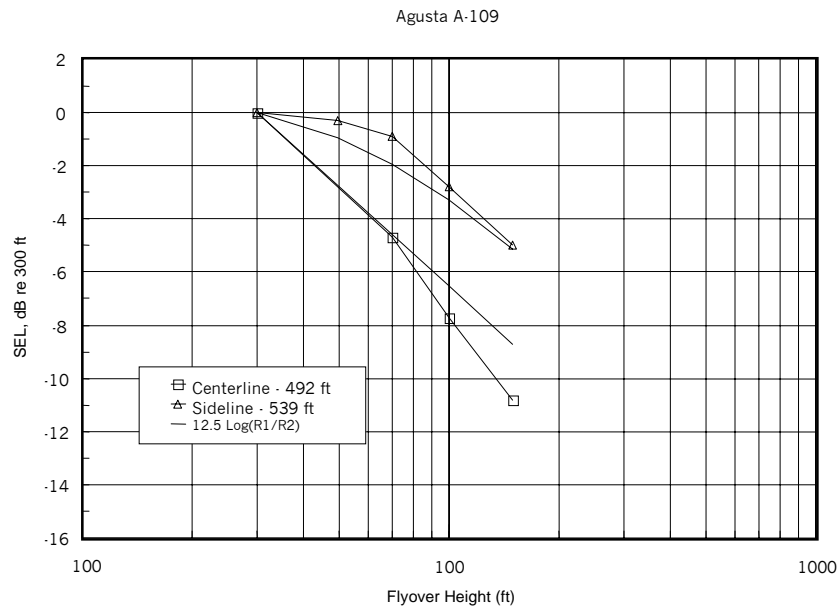
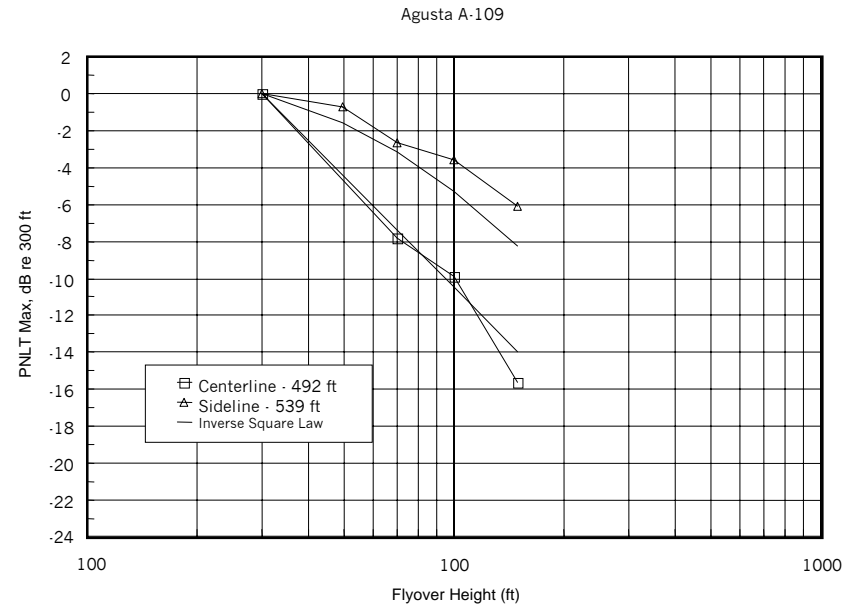
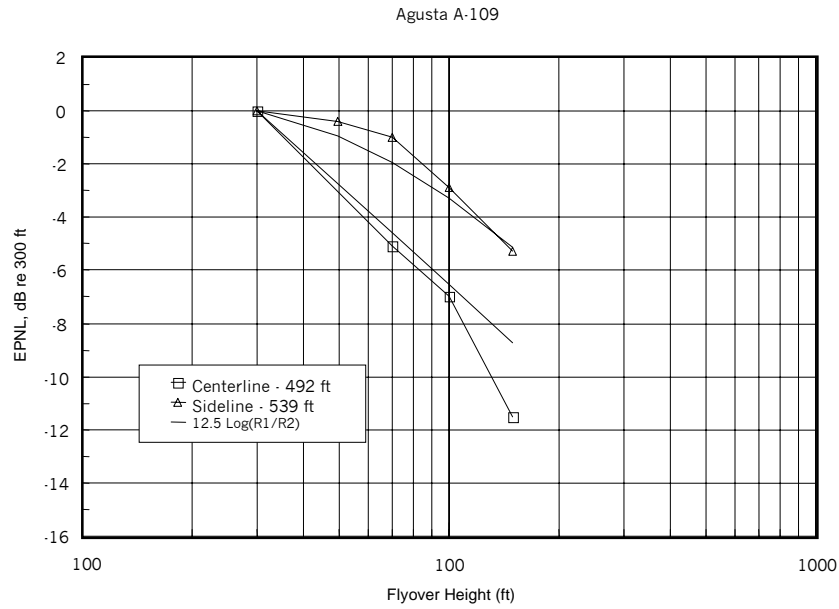


FIGURE 7-9. RELATIVE NOISE LEVELS OF AGUSTA A-109 HELICOPTER AS A FUNCTION OF HELICOPTER ALTITUDE

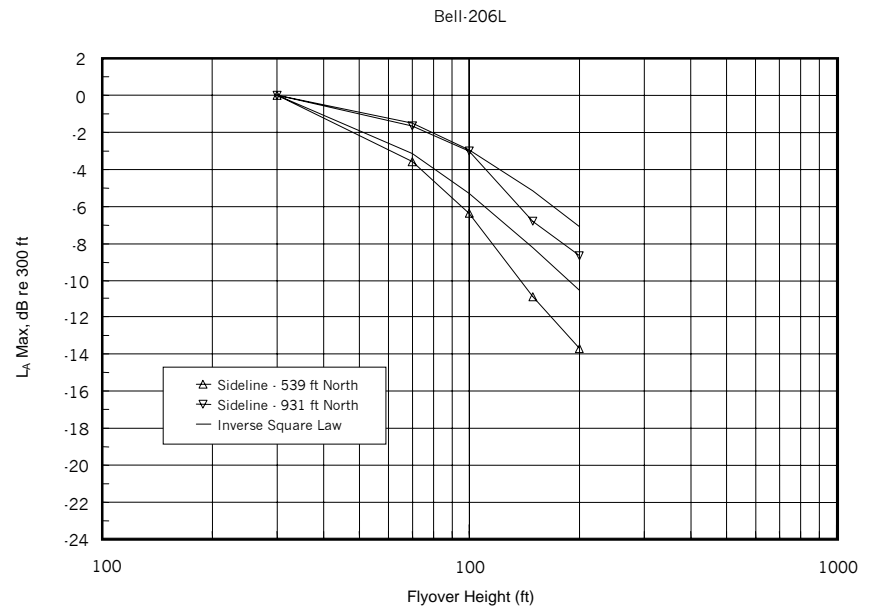
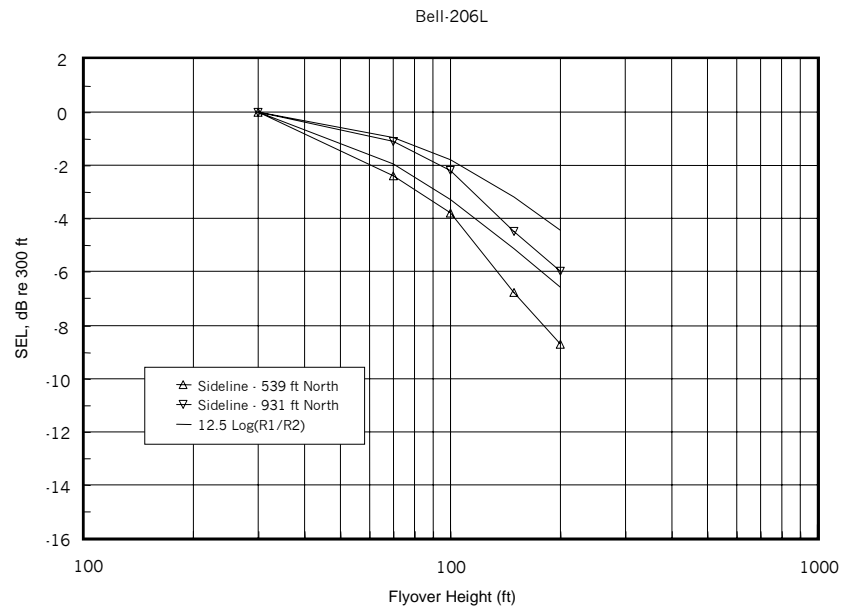
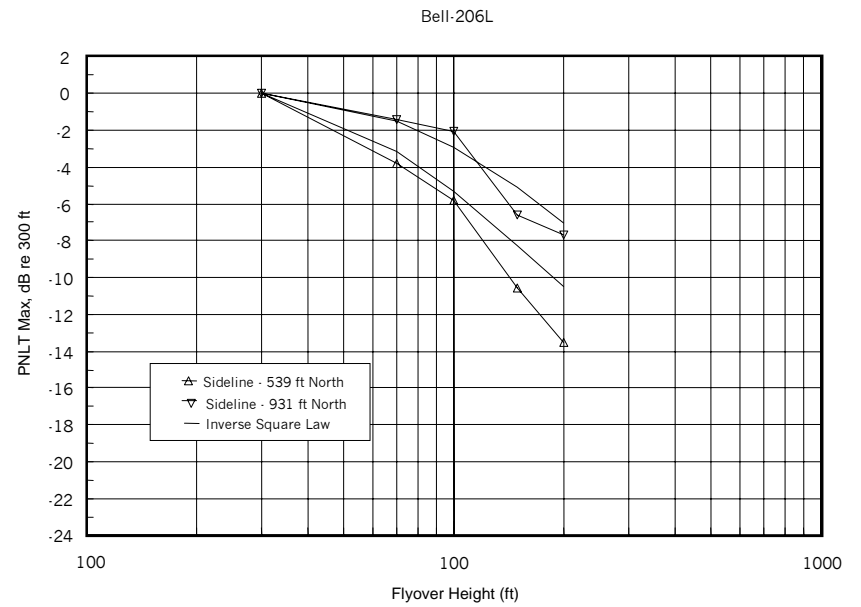
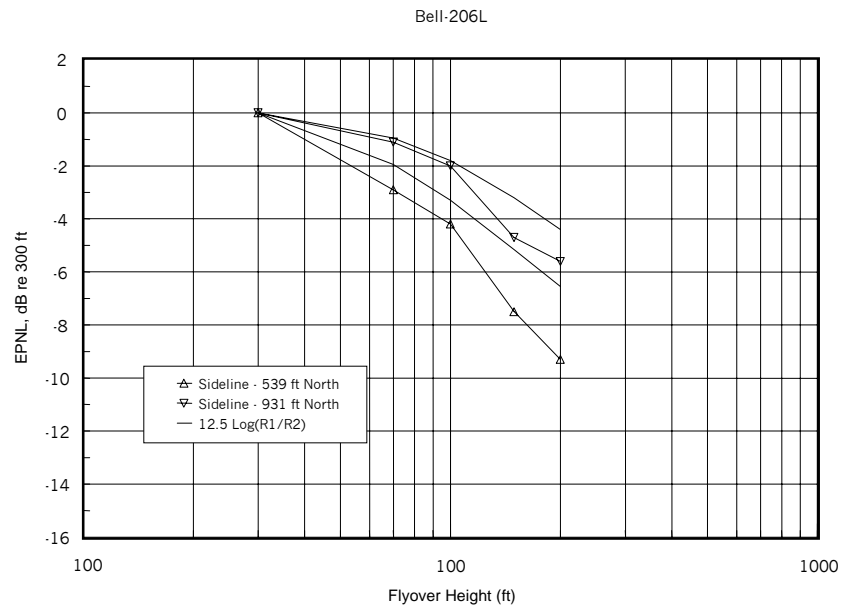


FIGURE 7-10. RELATIVE NOISE LEVELS OF BELL 206L HELICOPTER AS A FUNCTION OF HELICOPTER ALTITUDE

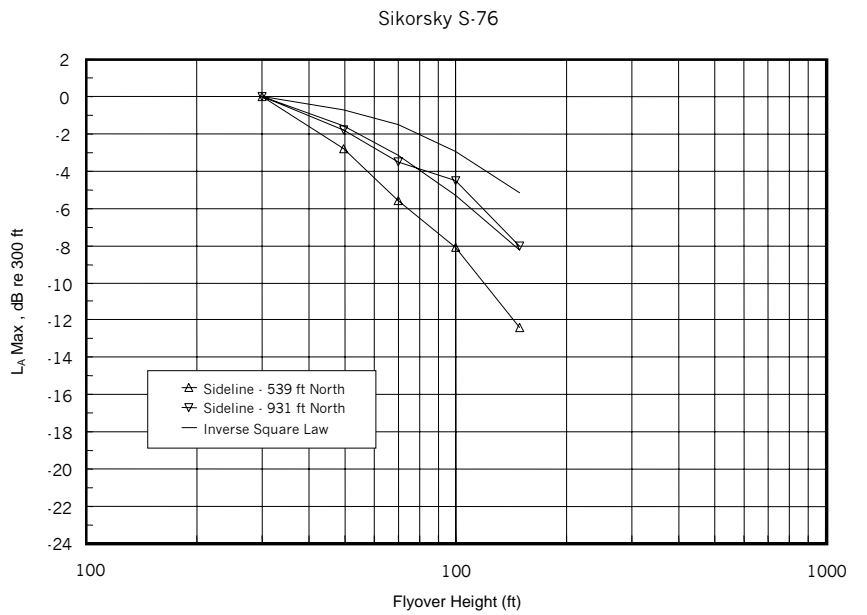
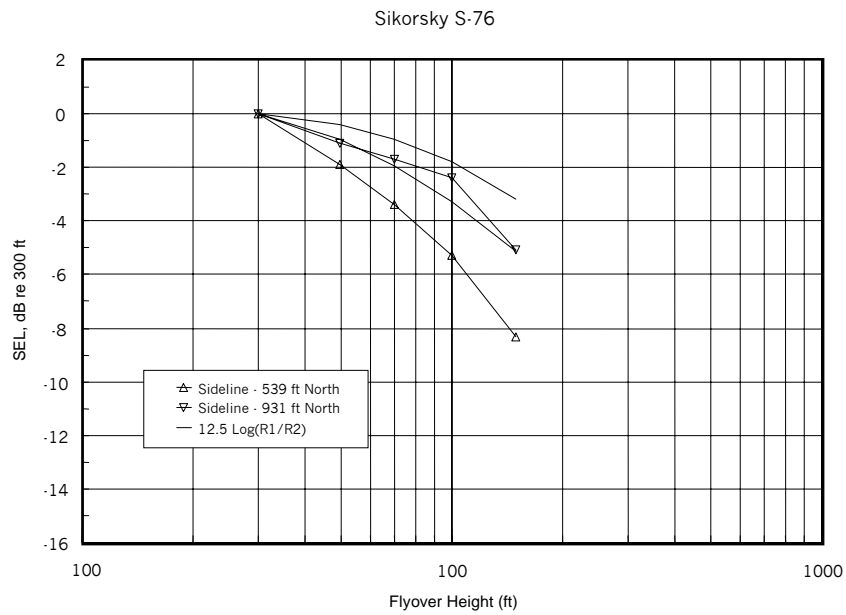
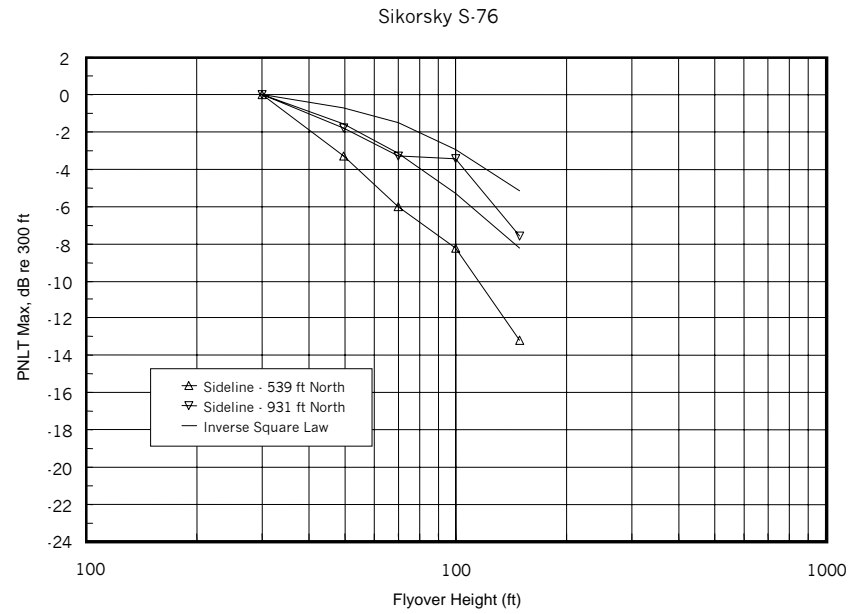
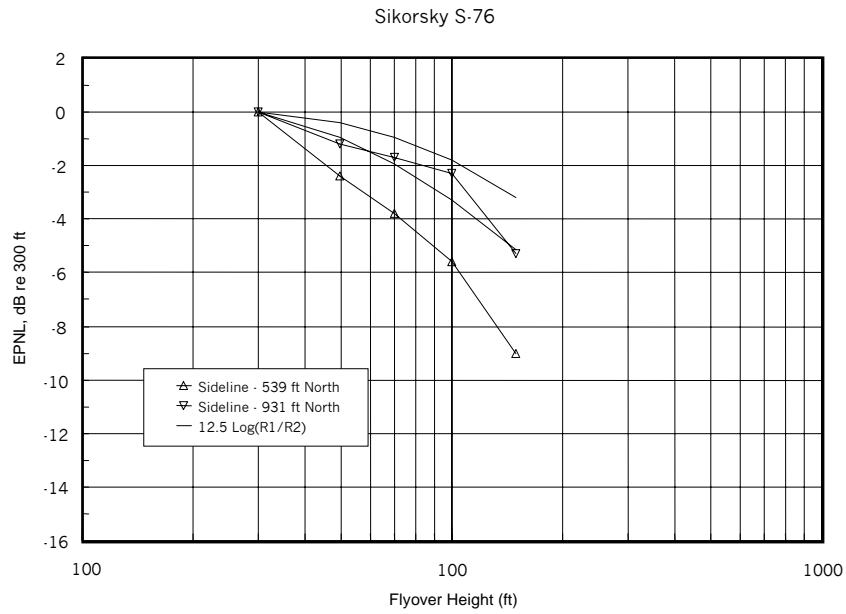


FIGURE 7-11. RELATIVE NOISE LEVELS OF SIKORSKY S-76 HELICOPTER AS A FUNCTION OF HELICOPTER ALTITUDE

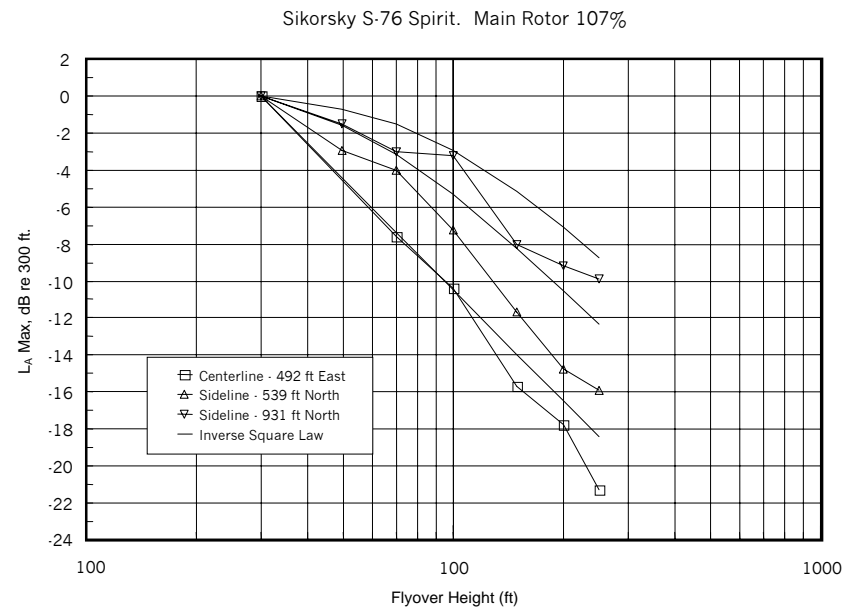
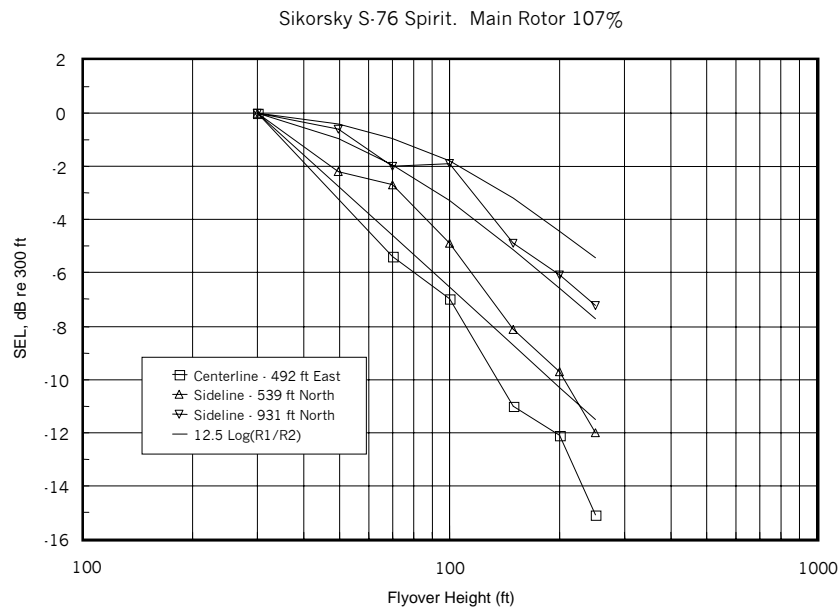
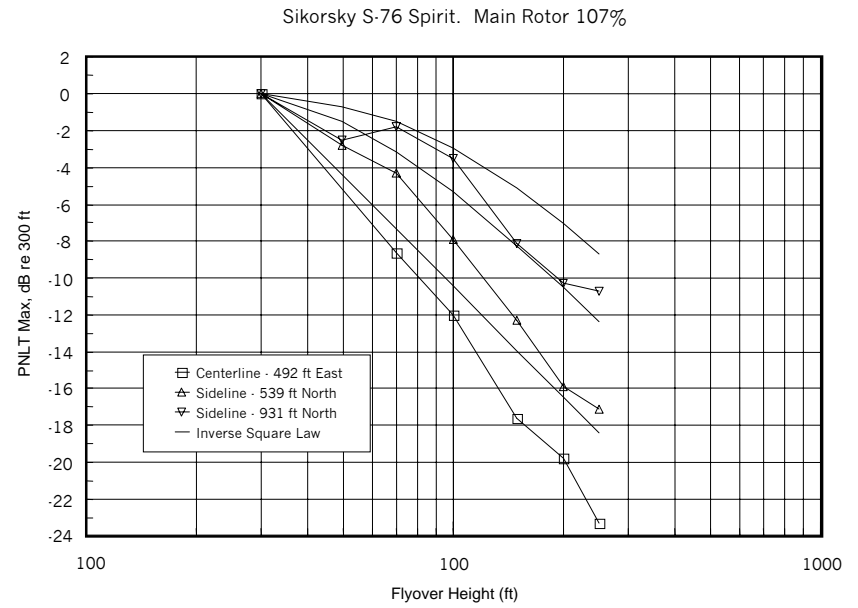
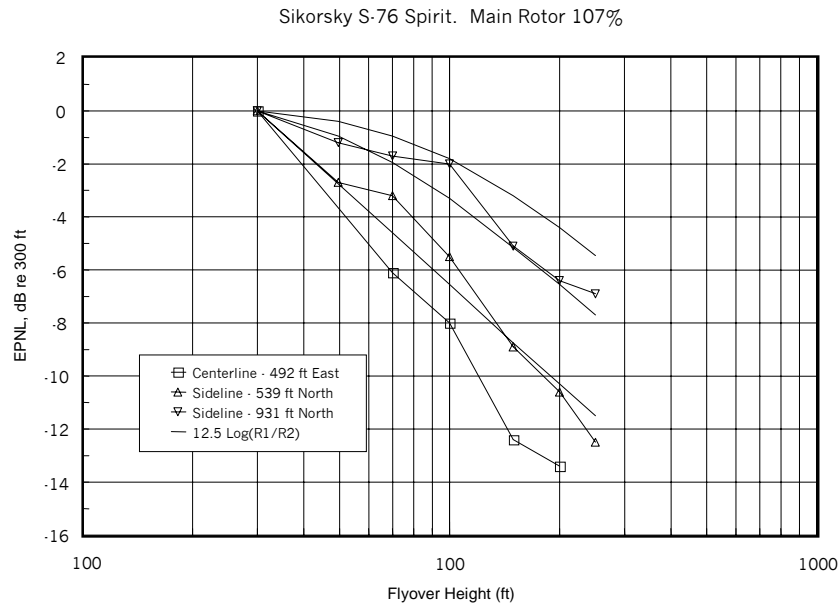


FIGURE 7-12. RELATIVE NOISE LEVELS OF SIKORSKY S-76 (107% RPM) HELICOPTER AS A FUNCTION OF HELICOPTER ALTITUDE

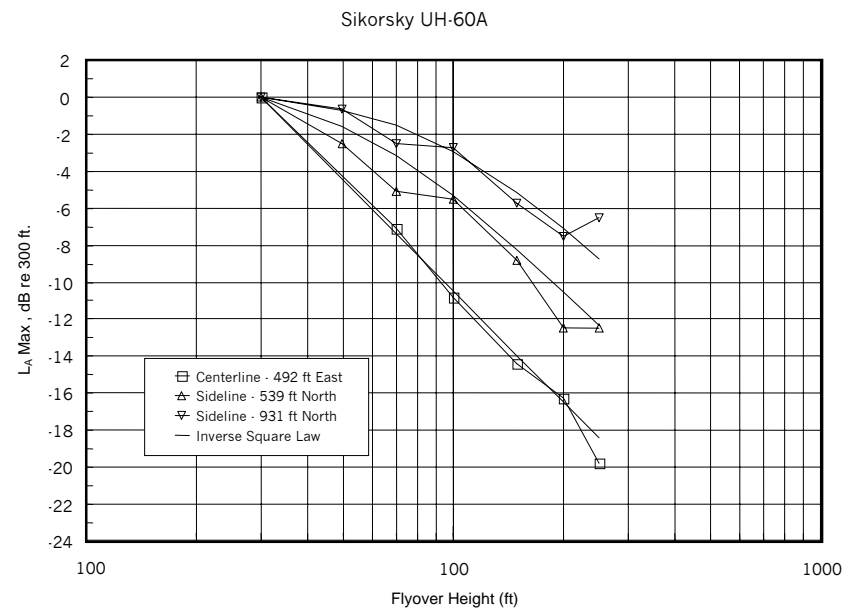
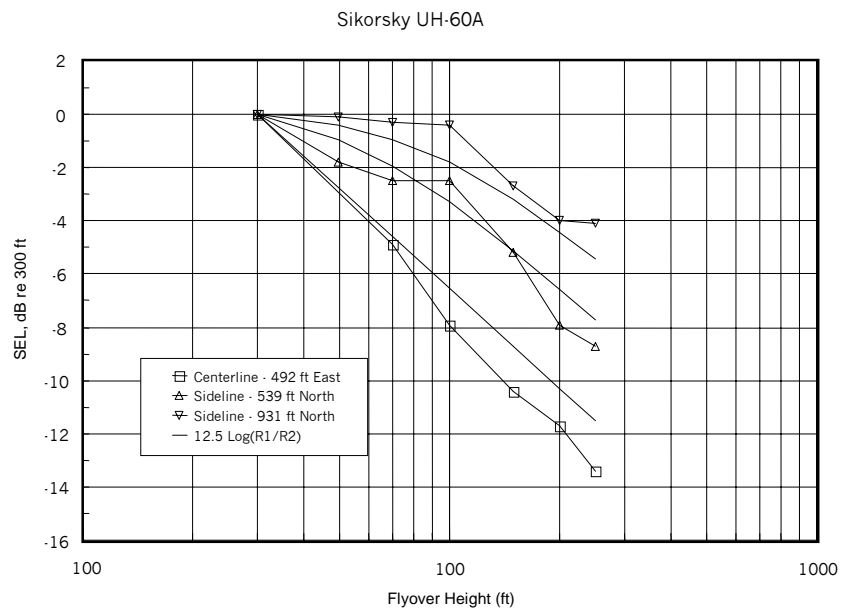
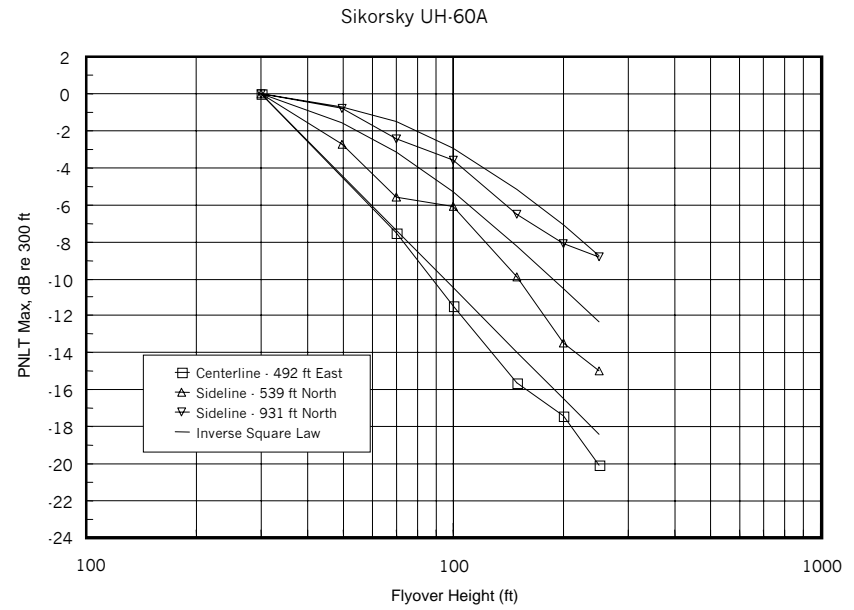
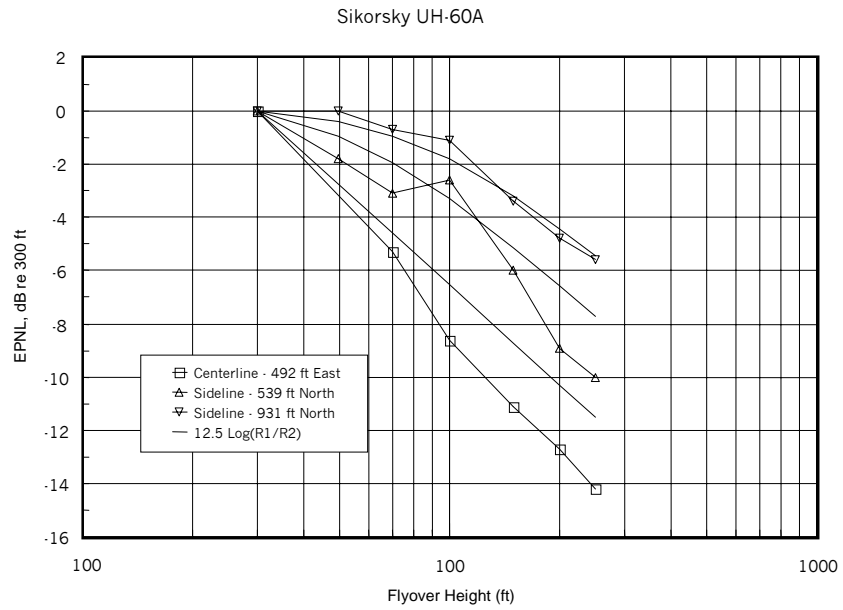


FIGURE 7-13. RELATIVE NOISE LEVELS OF SIKORSKY UH-60A HELICOPTER AS A FUNCTION OF HELICOPTER ALTITUDE

Based upon the FAA’s preliminary *in-situ* noise measurements (see Figure 7-14), increasing operational altitude or height AGL does reduce noise from helicopters (for details see Appendix G). Also, the *in-situ* data corroborates operational noise measurements reported in the New York City Master Plan Report. In general, trends support the industry’s voluntary operational guidance to “fly higher” altitudes.

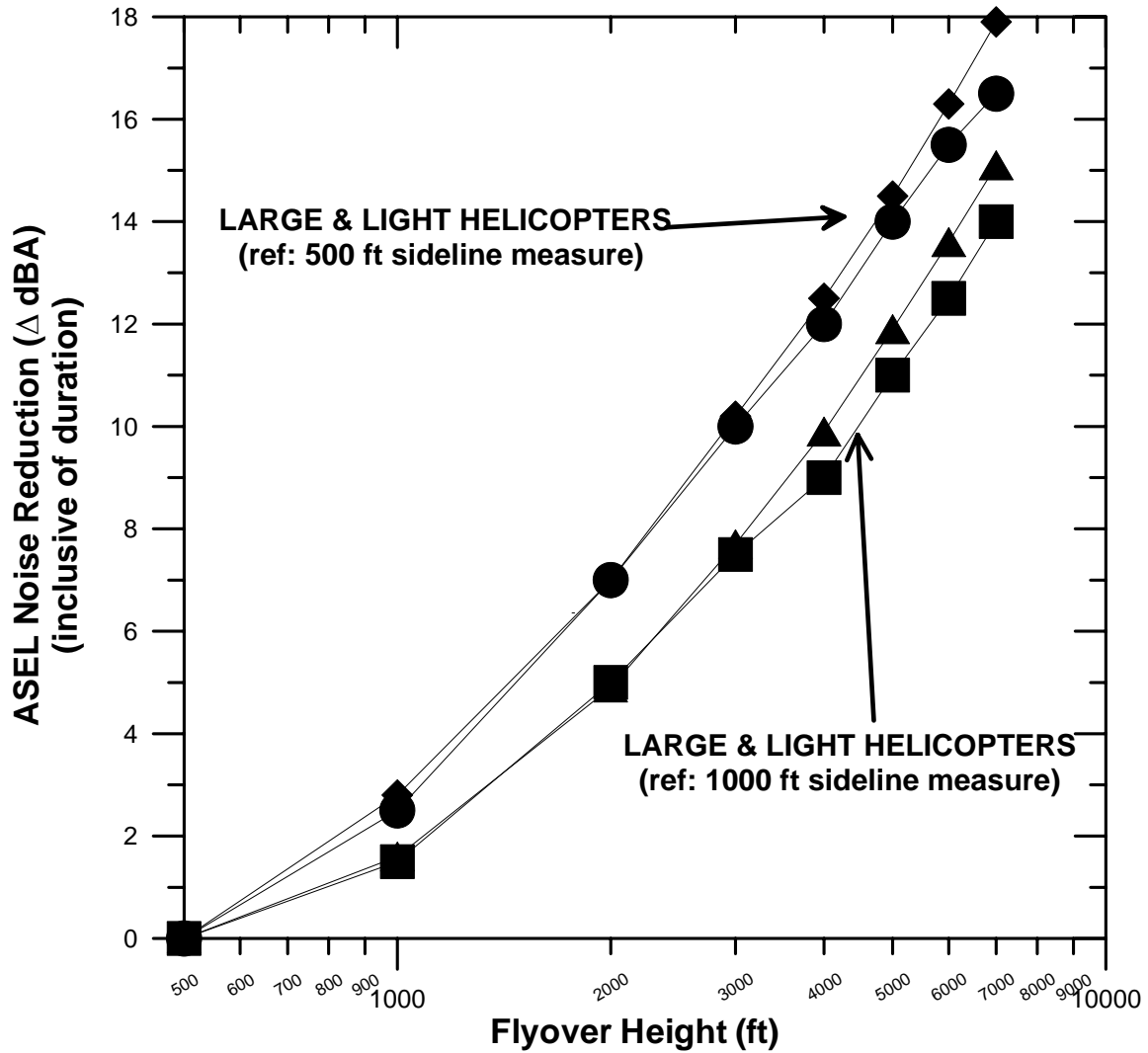


Figure 7-14. Altitude-Noise Reduction Sensitivity for Liberty State Park data

8.0 Summary and Recommendations

8.1 Summary of Noise “Effects on Individuals”

For this study, the background findings on the potential health “effects on individuals” due to community noise exposure, which were discussed in Section 3, are summarized as follows:

- Noise-induced hearing impairment. This is improbable by civil helicopters as they rarely produce 24-hour equivalent levels that exceed 70 dB.
- Noise effects on communications and performance. There is a lack of conclusive effects evidence for an average population. Adverse communication and performance effects has only been identified for under achievers in a classroom environment. But, general alleviation of possible effects is achievable by means of sound proof building construction and HVAC noise reduction sufficient to 35 dB indoor. For urban helicopter noise it can be expected that, where flights are frequent, the indoor equivalent level from helicopter noise may exceed 35 dB. It is also highly probable that other urban noise sources like street traffic and subway trains would similarly exceed this threshold.
- Awakening and sleep disturbance. This is nominally low for steady state sounds of familiarity as indicated by Equation 1 for field data. Yet, it can be likely for close random urban helicopter operations of long duration hover that occur at minimal background noise levels conditions such as early morning and late evening.
- Cardiovascular and physiological effects. When associated with long-term exposure, it does not represent a health threat due to helicopter noise when applying a 24-hour equivalent level that range from 65-70 dB or more criteria.
- Mental health effects. These are not believed to be a direct cause from noise. The notion of noise-induced mental health disorders has been rejected.
- Heighten annoyance factors. Several factors have been identified that relate to heightened community annoyance:
 - **Low- frequency noise susceptible population.**
 - **Non-acoustical effects:** 1) vibration and rattle and 2) “*virtual noise.*”
 - **Perception:** 1) helicopter noise characteristics and 2) rate of response.

8.2 Summary of Noise Reduction Conclusions and Recommendations

The FAA offers the following conclusions and recommendations based upon the study:

Additional development of socio-acoustic methodology to deal with helicopter noise should be pursued. Civil helicopter annoyance assessments utilize the same acoustic methodology adopted for fixed-wing airplanes with no distinction for a helicopter’s unique noise character. As a result, the annoyance of unaccustomed “impulsive” (spontaneous changing) helicopter noise has not been fully substantiated by a well-correlated metric. Comments from both the helicopter industry and the public strongly recommended that further socio-acoustic investigations be pursued. Additional civil

helicopter annoyance studies may help refine current noise measurement analysis methodology that would lead to improved noise mitigation effectiveness. FICAN could charter a technical study to focus on low-frequency noise metric to evaluate helicopter annoyance, including performance of multi-year socio-acoustic (noise) studies to correlate helicopter annoyance and health effects of urban helicopter operations. In the meantime, the FAA will continue to rely upon the widely accepted DNL as its primary noise descriptor for airport and heliport land use planning. The FAA will also continue the use of supplemental noise descriptors for evaluation of helicopter noise issues.

To date, this recommendation has been incorporated into the Rotorcraft Research and Development Initiative for Vision 100 – Century of Aviation Reauthorization Act (Public Law 108-176) under Sec. 711. For Sec. 711, NASA, FAA, and the rotorcraft industry defined a 10-year rotorcraft research and development (R&D) plan that included the study of Psychoacoustics. The research proposes to determine human annoyance levels due to helicopter noise, both in its native condition and synthetically modified. Studies would be conducted to uncover neglected characteristics of noise and develop a refined metric more representative of the true human response.

- Further operational alternatives that mitigate noise should be explored. A number of operational alternatives, proposed by the public and industry, have the potential to mitigate urban nonmilitary helicopter noise and preserve the safe and efficient flow of air traffic. In particular, the FAA found:
 - Noise reduction benefits can be achieved with higher altitude flight. With more conclusive demonstrations addressing safety, such noise mitigation approaches could be integrated within the ATC design planning in specific urban airspaces;
 - Optimal helicopter route planning to avoid noise sensitive areas will require comprehensive evaluation for each specific region of concern;
 - The promotion of noise abatement procedures should be pursued on two fronts-- helicopter pilots and air traffic control personnel. The FAA will continue training ATC personnel to increase awareness of noise abatement procedures that best mitigate noise over communities; and
 - The use of advanced technologies, such as GPS, in helicopter approach and departure procedures does show to be beneficial for noise abatement operations. Preliminary GPS/noise research sponsored by the NRTC/RITA has indicated promising noise reductions using more precise procedures.

The implementation of any of these alternatives would require comprehensive evaluation, and demonstration where appropriate on a case-by-case basis, in accordance with all applicable FAA orders and regulations. Also, careful consideration would have to be taken of any ATC changes to an urban segment of the NAS that could impact the heavily utilized and highly burdened large commercial transport sector. Finally, funding levels

required to develop and explore the technology and procedures listed above will be significant.

Similarly under the 2004 Vision 100 Rotorcraft R&D plan, operational noise reduction studies were defined to aid in the noise mitigation of legacy helicopters, such as the Sikorsky S-76 and Bell helicopter products. The expansion of noise abatement flight techniques would be tested for consistency with safety and passenger comfort for several classes of rotorcraft: light, medium and advanced configurations. At the R&D program conclusion, the compilation of noise mitigation technology and abatement operational procedures is to be integrated and demonstrated in a selected single flight vehicle for noise and system validation.

Also, under the Vision 100 plan, there is the “Zero ceiling/Zero visibility” operational goal that addresses advances in navigational system such as wide area augmentation system (WAAS) and local area augmentation system (LAAS) and moving to a comprehensive differential global position system (dGPS) precision navigation capability. Such research applications have proven beneficial to noise mitigation and are expected to enhance the noise abatement operational procedures development.

- Emergency helicopter service should be exempt from restrictions. A key outcome of the FAA-hosted workshops was the mutual agreement among public and industry participants that emergency helicopter service (air medical, law enforcement, fire-fighting, public services, etc.) should be exempted from any proposed limitations or restrictions considered by Congress following this study. These services are time-critical and provide a “noise-excusable” public service.
- Helicopter operators and communities should develop voluntary agreements to mitigate helicopter noise. Federal, state and local governments should encourage voluntary mutual cooperation by operators, the community, and local authorities to establish a “noise response” process; e.g., New York City Heliport Oversight Committee (informal). Also, Federal, state and local governments establish business incentives that encourage the “pooling” of helicopter operations, especially for redundant Electronic News Gathering (ENG) operations.

A framework for understanding noise impacts on wildlife: an urgent conservation priority

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Anthropogenic noise is an important environmental stressor that is rapidly gaining attention among biologists, resource managers, and policy makers. Here we review a substantial literature detailing the impacts of noise on wildlife and provide a conceptual framework to guide future research. We discuss how several likely impacts of noise exposure have yet to be rigorously studied and outline how behavioral responses to noise are linked to the nature of the noise stimulus. Chronic and frequent noise interferes with animals' abilities to detect important sounds, whereas intermittent and unpredictable noise is often perceived as a threat. Importantly, these effects can lead to fitness costs, either directly or indirectly. Future research should consider the range of behavioral and physiological responses to this burgeoning pollutant and pair measured responses with metrics that appropriately characterize noise stimuli. This will provide a greater understanding of the mechanisms that govern wildlife responses to noise and help in identifying practical noise limits to inform policy and regulation.

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An emerging aim in applied ecology and conservation biology is to understand how human-generated noise affects taxonomically diverse organisms in both marine (eg Slabbekoorn *et al.* 2010; Ellison *et al.* 2012) and terrestrial (eg Patricelli and Blickley 2006; Barber *et al.* 2010; Kight and Swaddle 2011) environments. Noise is a spatially extensive pollutant and there is growing evidence to suggest that it may have highly detrimental impacts on natural communities; yet efforts to address this issue of emerging conservation concern lack a common framework for understanding the ecological consequences of noise. A conceptual scaffold is critical to scientific progress and to

its ability to inform conservation policy. As more attention and resources are invested in understanding the full ecological effects of noise, it is important that investigators design research questions and protocols in light of the many possible costs associated with noise exposure and also that they properly link responses to several relevant features of noise, such as intensity, frequency, or timing, that could explain wildlife responses (Panel 1).

Here we introduce a framework using a mechanistic approach for how noise exposure can impact fitness at the level of the individual organism as a result of changes in behavior, and identify several acoustic characteristics that are relevant to noise exposure and ecological integrity. We provide representative examples of noise impacts, primarily from terrestrial systems; however, these issues are equally applicable to organisms in aquatic environments. We stress that various responses to noise exposure are less obvious than those that have typically been studied to date, such as signal modifications (eg changes in vocal frequency, amplitude, or vocalization timing) and decreases in site occupancy (eg Bayne *et al.* 2008; Francis *et al.* 2011b). Importantly, probable behavioral responses to noise that merit further scientific study might be detrimental to individual fitness and may have severe population-level consequences. As we show below, the presence of a species in a noisy area cannot be interpreted as an indication that it is not being impacted by elevated sound levels, because there are many potential costs associated with noise exposure that have not been rigorously studied.

In a nutshell:

- Noise is an intense, widespread pollutant, relevant to conservation efforts worldwide
- Using the number of animals present in environments exposed to anthropogenic noise as the sole metric of noise impacts can be deceiving because there are many hidden costs of noise exposure (eg compromising predator/prey detection or mating signals, altering temporal or movement patterns, increasing physiological stress)
- To ensure that conservation initiatives (and efforts to establish regulatory limits) are relevant, investigators must properly characterize a suite of noise features
- Reducing noise exposure and incorporating sound measurement into environmental planning will quickly benefit ecological systems

■ Variation in responses to the same noise stimulus

Species differ in their sensitivities to noise exposure (Bayne *et al.* 2008; Francis *et al.* 2009, 2011a); however,

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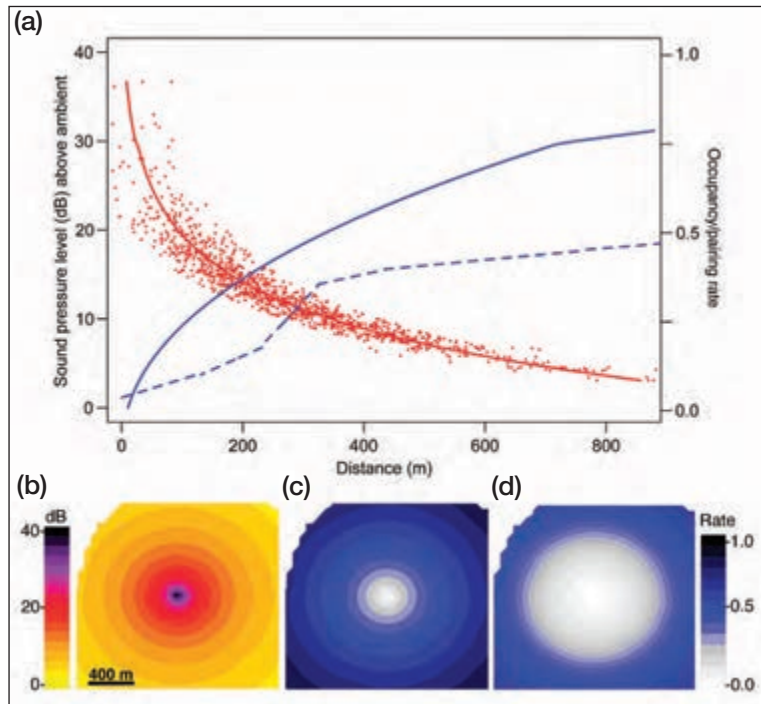


Figure 1. Responses to the same noise stimulus can take a variety of shapes. (a) The sound pressure level (SPL) of noise (red) decreases with increasing distance from the source but may not reach “baseline” ambient levels until ~1 km away (this distance will vary depending on noise source and the environment). Response curves for species occupancy (blue solid line) and pairing rates (blue dashed line) in response to noise may have unique shapes, as might other measures of species responses to noise stimuli. The relationship between SPL and distance is from Francis et al. (2011c) and Francis (unpublished data) with noise generated from gas well compressors. Behavioral responses are hypothetical but based on responses in Francis et al. (2011c). (b) Spatial propagation of elevated noise levels from a point source (such as a single car or an oil/gas compressor station), which decays at a spreading loss of 6 dB or more per doubling of distance, due to the geometry of the spherical wave front. It is important to note that line sources (such as a busy highway; not shown) lose only 3 dB per doubling of distance due to their cylindrical wave front. Clearly, knowledge of the geometry of anthropogenic noise stimuli is essential to understanding the scale of exposure. (c and d) Spatial representation of (c) species occupancy and (d) pairing success surrounding a point source of noise.

the degree to which individuals vary in sensitivity to noise during each life-history stage or due to behavioral context has been underappreciated. For example, ovenbird (*Seiurus aurocapilla*) habitat occupancy appears uninfluenced by noise exposure (Habib et al. 2007; Bayne et al. 2008; Goodwin and Shriver 2011), yet males defending noisy territories are less successful in attracting mates (Habib et al. 2007). Reed buntings (*Emberiza schoeniclus*) also show reduced pairing success in noisy areas (Gross et al. 2010). Such examples should serve as a warning to biologists, land managers, and policy makers: the same noise stimulus can affect various response metrics in different ways. An organism might show little to no response to noise in terms of habitat occupancy or foraging rate, for example, but may experience strong negative

impacts in terms of pairing success, number of offspring, physiological stress, or other measures of fitness (Figure 1). Because the various responses may range from linear to threshold functions of noise exposure, investigators should take an integrative approach that incorporates several different metrics (eg density, pairing success, number of offspring), rather than using a single metric to describe how noise influences their study organism. But which alterations in behavior are most likely to occur and which are the most detrimental? These are important questions because funding and logistical constraints ensure that measuring all of the potential impacts of noise is impossible. Fortunately, the nature of sound stimuli can guide investigators toward likely behavioral changes that may influence fitness.

■ Characterizing noise and the disturbance–interference continuum

Determining whether a particular noise stimulus is within an organism’s sensory capabilities is foremost in importance; if a sound consists of frequencies that are outside of an organism’s hearing range, it will not have a direct effect (Panel 1; Figure 2). Provided that an organism can hear the noise stimulus, its acoustic energy could cause permanent or temporary hearing loss, but this might only occur when the animal is extremely close to the source of the noise (Dooling and Popper 2007).

Instead, sounds may have their greatest influence on behavior, which then translates into fitness costs, but how and why noise elicits a response can vary greatly (Figures 2 and 3). At one extreme, noise stimuli that startle animals are perceived as threats and generate self-preservation responses (eg fleeing, hiding), which are similar to responses to real predation risk or non-lethal human disturbance (ie the risk–disturbance hypothesis, which posits that animal responses to human activities are analogous to their responses to real predation risk; Frid and Dill 2002). Noise stimuli at this end of the continuum are often infrequent, but are abrupt and unpredictable. At the other end of the continuum, noise can impair sensory capabilities by masking biologically relevant sounds used for communication, detection of threats or prey, and spatial navigation. These noise stimuli tend to be frequent or chronic and their spectral (ie frequency) content overlaps with biologically relevant sounds. Increases in noise intensity (loudness or amplitude) will increase the severity of the impacts, regardless of whether it is perceived as a threat or masks biologically relevant sounds. An important supplement to this dichotomy is

that limited stimulus processing capacity could be responsible for some detrimental effects. Noise stimuli of various kinds might act as a distraction, drawing the animal's attention to a sound source and thereby impairing its ability to process information perceived through other sensory modalities (Chan *et al.* 2010). Alternatively, noise may reduce auditory awareness, trigger increased visual surveillance, and compromise visually mediated tasks. The mechanistic details and ecological importance of such distractions still need to be fully explored. Regardless, the conservation implications of understanding the importance of noise as a distractor are not trivial; if distraction is a fundamental route for noise impacts, our concern might spread beyond those frequencies that overlap with biologically relevant signals.

■ Behavioral changes

Although a limited number of laboratory studies have suggested that noise may affect gene expression, physiological stress, and immune function directly (Figure 3a; Kight and Swaddle 2011), most noise-related impacts appear to involve behavioral responses across four categories: (1) changes in temporal patterns, (2) alterations

in spatial distributions or movements, (3) decreases in foraging or provisioning efficiency coupled with increased vigilance and anti-predator behavior, and (4) changes in mate attraction and territorial defense (Figure 3). As demonstrated below, these disturbance-, distraction-, and masking-mediated behavioral changes could directly impact individual survival and fitness or lead to physiological stress that may then compromise fitness.

Changes in temporal patterns

Sound stimuli that are perceived as threats can alter temporal patterns; for example, red foxes (*Vulpes vulpes*) cross busy roads when traffic rates are lower, suggesting noise cues might be affecting the timing of their movements (Figure 3b; Baker *et al.* 2007). Similarly, noise from boat traffic disrupts the timing of foraging by West Indian manatees (*Trichechus manatus*), potentially influencing foraging efficiency and energy budgets (Figure 3m; Miksis-Olds *et al.* 2007). Noise can also change behavior due to interference with cue detection. European robins (*Erithacus rubecula*) avoid acoustic interference from urban noise by singing at night, when noise levels are lower than during daylight hours (Figure 3c; Fuller *et al.* 2007). Although this example may appear to be an

Panel 1. Sound features relevant to noise-impact studies

In the main text we discuss how the spectral (frequency) composition of noise is related to an organism's hearing range and its ability to detect relevant sounds. For these reasons, it is critical that researchers collect sound-level data with an appropriate frequency-weighting filter. For instance, the "A" filter on many sound-level meters is based on equal loudness contours for human hearing; this filter provides a conservative estimate of bird hearing and is the best readily-available weighting for bird studies (Dooling and Popper 2007). However, whether working with birds or other taxa, it is best to simultaneously record and measure the noise using a "flat" frequency filter, then truncate the resulting spectral output to the most relevant frequency range for each species of interest (see below).

Investigators should also avoid the temptation to characterize a noise stimulus as a single decibel value, whether weighted or not, as other metrics that describe the noise are equally important (Figure 2). Time-averaged values, such as equivalent continuous sound level (L_{eq}), can be extremely informative to describe sounds that are chronic or frequent; however, these integration times do not properly characterize sounds that occur once, infrequently, or more regularly. Instead, measurements integrated over several hours will mischaracterize short, abrupt sounds that could be viewed as disturbances, such as noise events created by infrequent and loud military jet overflights that alter the behavior and time budgets of harlequin ducks (*Histrionicus histrionicus*; WebFigure 1; Goudie 2006). For disturbance sounds, exposure metrics that capture each sound event's maximum power (L_{max} ; WebFigure 1a) and the rate at which power rises from the lowest detectable level to its maximum are important (ie onset; Figure 2). L_{max} values are often reported without stating the frequency weighting; in these cases, A-weighting (a human-centric curve) is

assumed, which may be inappropriate for many animals.

In contrast, quantification of chronic noise can best be served with time-averaged values such as L_{eq} (WebFigure 1b). L_{eq} is typically calculated over 24 hours; however, many studies fail to report over what time period L_{eq} values were integrated and a 24-hr integration is assumed, which may not be appropriate for many ecological questions. For example, for a species that is sensitive to traffic noise, such as the white-breasted nuthatch (*Sitta carolinensis*; WebFigure 1b; Goodwin and Shriver 2011), it may be best to truncate the time interval to the hours of biological interest, such as during dawn chorus. Limiting frequency analyses to the hearing or vocal range of the target species or community may also be beneficial (eg Halfwerk *et al.* 2011b). Future studies should aim to use biologically relevant integration times and report these details.

Best practices will include simultaneous acquisition of high-quality audio recordings along with multiple sound level measurements to offer unconstrained opportunities to investigate alternative spectral filtering, time integration, and additional measurements, such as order statistics indicating the percentage of time above a certain decibel level or metrics reflective of the sound event's predictability (Figure 2). Carefully considering how these temporal, intensity, and frequency features (Figure 2b) interact will help investigators identify where along the disturbance–interference continuum (Figure 2a) the stimulus is most likely to fall and will help identify the most likely behavioral responses (Figure 3).

Above all, to maximize interpretability of results, facilitate comparisons among studies, and provide meaningful data for conservation measures, it is critical to explicitly report the acoustic metrics used in each study to describe species responses. Additional sound metric and terminology details can be found in Barber *et al.* (2011) and Pater *et al.* (2009).

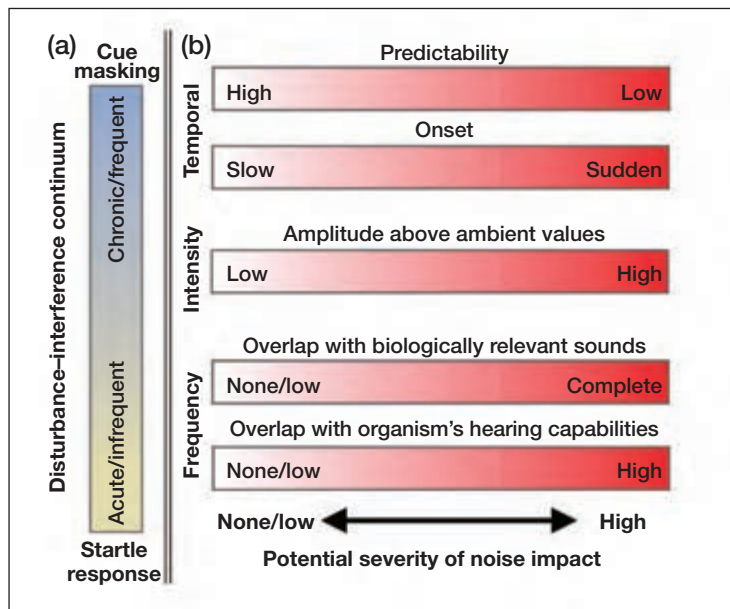


Figure 2. (a) The disturbance–interference continuum can range from acute or infrequent noise stimuli that will likely trigger startle or hide responses to frequent or chronic noises that interfere with cue detection. (b) The severity of an impact from a noise stimulus will depend on the temporal, intensity, and frequency features of the stimulus.

important behavioral adaptation that permits this species to overcome unfavorable acoustic conditions, the consequences of shifting the timing of song delivery are unknown. The effects of signal timing on mate attraction or territorial defense may be just as important to fitness as other signal features (eg frequency, syntax). Changes in the timing of song delivery of less than one hour can break down signaler–receiver coordination so that conspecific males do not recognize species-specific signals (Luther 2008). If signaler–receiver coordination is disrupted between singing males and responsive females, the behavioral flexibility that permits shifts in signal timing in response to noise may possibly be maladaptive.

Sleep is an important factor and follows a strong temporal profile. Although a substantial body of research has investigated the impact of noise on sleep in humans, scant information is available regarding its effects in other animals (reviewed in Kight and Swaddle 2011). Understanding the importance of sleep disruption on overall fitness is critical as we might expect detrimental influences even for species not typically described as dependent upon hearing (eg visually oriented predators such as raptors).

Alterations in spatial distributions or movements

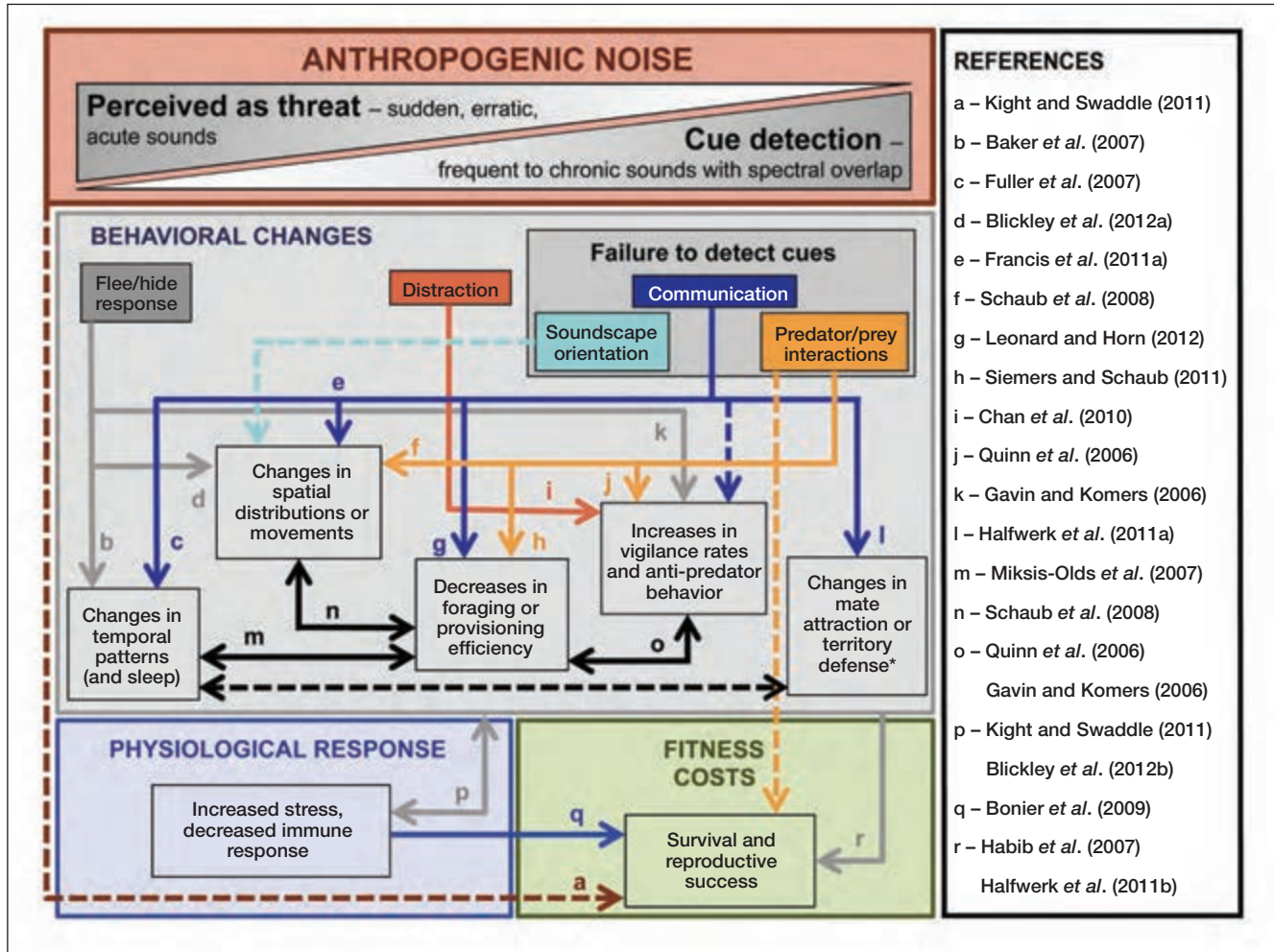
Among the most obvious responses to noise are site abandonment and decreases in spatial abundance. These metrics may also be easiest and least costly to quantify, which perhaps explains why there are many such examples in the literature (eg Bayne *et al.* 2008; Eigenbrod *et al.* 2008; Francis *et al.* 2009). However, noise itself can affect an

investigator's ability to measure responses to noise. For example, increases in continuous noise of 5–10 decibels (dB, A-weighted; Panel 1) above baseline can reduce bird numbers during standard bird surveys by one-half, greatly biasing measures of site occupancy and abundance (Ortega and Francis 2012). If not carefully considered, this detection problem could bias subsequent interpretations and management efforts.

Despite the known effects of noise on population sizes, there is still considerable evidence to suggest that animals may abandon areas when frequent or chronic noise stimuli interfere with cue detection or when more variable sounds are perceived as threats (Bayne *et al.* 2008; Goodwin and Shriver 2011; Blickley *et al.* 2012a). Birds with low-frequency vocalizations experience more acoustic interference from chronic low-frequency anthropogenic noise and therefore exhibit stronger negative responses to noise in their habitat use than birds with high-frequency vocalizations that experience less acoustic interference (Figure 3e; Francis *et al.* 2011a). These masking effects can be spatially extensive, potentially impairing communication at distances ranging from 0.5 to 1.0 km or farther from the noise source (Blickley and Patricelli 2012). Furthermore, changes in spatial distributions due to noise's effect on cue detection are not restricted to intraspecific communication; for instance, greater mouse-eared bats (*Myotis myotis*), which locate terrestrial prey based on sounds they generate when walking, also avoid hunting in noisy areas (Figure 3f; Schaub *et al.* 2008). In addition to disrupting cue detection at the intra- and interspecific level, ambient noise may also interfere with cue detection used for movement at larger spatial scales. Some frog species use conspecific calls to locate appropriate breeding habitat, while some newt species use heterospecific calls for the same purpose (reviewed in Slabbekoorn and Bouton 2008). Whether noise exposure impedes animals from using such acoustic beacons to locate critical resources (eg water, food, habitat) is unknown and should be a focus of future research.

Site abandonment or decreases in population numbers can also occur in response to unpredictable, erratic, or sudden sounds, which are perceived as threats (Figure 3d). For example, greater sage grouse (*Centrocercus urophasianus*) lek attendance declines at a higher rate in response to experimentally introduced intermittent road noise than to continuous noise (Blickley *et al.* 2012a), suggesting that sage grouse site occupancy may depend more on perceived risk than on masking of acoustic cues. Nevertheless, masking of communication may have other consequences (Figure 1).

Species undoubtedly differ in their sensitivities to disruptive sounds, but individuals within a population also show such differences (Bejder *et al.* 2006). Individuals can



REFERENCES

- a – Kight and Swaddle (2011)
- b – Baker *et al.* (2007)
- c – Fuller *et al.* (2007)
- d – Blickley *et al.* (2012a)
- e – Francis *et al.* (2011a)
- f – Schaub *et al.* (2008)
- g – Leonard and Horn (2012)
- h – Siemers and Schaub (2011)
- i – Chan *et al.* (2010)
- j – Quinn *et al.* (2006)
- k – Gavin and Komers (2006)
- l – Halfwerk *et al.* (2011a)
- m – Miksis-Olds *et al.* (2007)
- n – Schaub *et al.* (2008)
- o – Quinn *et al.* (2006)
- p – Kight and Swaddle (2011)
- q – Bonier *et al.* (2009)
- r – Habib *et al.* (2007)

Figure 3. Conceptual framework for understanding how noise stimuli – perceived as a threat or interfering with cue detection (the disturbance–interference continuum) – can elicit behavioral responses that have direct consequences for fitness or via a physiological stress response, which can also feed back to behavioral changes. Startle/hide responses are more likely to occur in response to noise stimuli that are perceived as a threat (acute, erratic, or sudden sounds). Problems arising from a failure to detect cues are more likely to occur when noise stimuli are chronic and overlap with biologically relevant cues used for communication, orientation, and predator/prey detection. Problems arising from distraction may occur as a result of sounds with features ranging from those that interfere with cue detection to those that are perceived as threats. Lowercase letters indicate studies (listed on the right) providing evidence for the link made for each arrow. Dashed arrows signify a link that we predict as important but for which no current evidence exists. The asterisk denotes that which could result from a change in behavior or a failure to change behavior in response to noise.

vary greatly in their behavioral responses to stimuli, which may explain the variations in their ability to cope with environmental change (Sih *et al.* 2004). The redistribution of sensitive and tolerant individuals across the landscape may not appear to be a problem. However, in the case of social animals, where group living provides protection from predation, the loss of sensitive individuals from the group through site abandonment could increase predation risk for the group as a whole through the removal of the most vigilant group members. These sensitive individuals, who are now isolated from the group, lose the benefit of safety in numbers. Depending on population structure and the scale at which these individuals are displaced by noise, genetic diversity may be reduced because traits that govern risk-averse (shy/sensi-

tive) and risk-prone (bold) behaviors can be heritable (Dingemanse *et al.* 2002).

Site abandonment and changes in abundance provide only a limited understanding of how noise can impact wildlife populations and communities. Importantly, abundance can also be misleading because areas where individuals are abundant do not always translate into high fitness for those individuals (eg Johnson and Temple 1986). Using such evidence to conclude that noise has no impact is problematic; individuals may not have alternative areas to occupy or other responses (survival, mating success, reproductive output) may be negatively affected by noise even when abundance is high (Figure 1a). These possibilities are especially likely when a noise stimulus is new and demographic processes

have not had time to impact population size or when the population in an area that is exposed to noise is supplemented by individuals from elsewhere (ie source-sink dynamics).

Decreases in foraging or provisioning efficiency and increased vigilance and anti-predator behavior

Noise can impair foraging and provisioning rates directly (Figure 3, g and h) or indirectly as a consequence of increased vigilance and anti-predator behavior (Figure 3, i–k, o). When noise is perceived as a threat, an organism may miss foraging opportunities (“missed opportunity cost”; Brown 1999) while hiding or as a result of maintaining increased vigilance (Figure 3k; Gavin and Komers 2006). Missed opportunities can also occur when noise interferes with cue detection. For instance, nestling tree swallows (*Tachycineta bicolor*) exposed to noise beg less in response to recorded playbacks of parents arriving at nests (eg calls, movement, sounds) than nestlings in quiet conditions, presumably because the ambient noise masks parent-arrival sounds (Figure 3g; Leonard and Horn 2012). Unfortunately, this study did not determine whether missed provisioning opportunities translated into costs, such as reduced nestling mass or fledging success.

Noise that interferes with cue detection can also hamper predators’ hunting abilities. For example, among greater mouse-eared bats, search time for prey was shown to increase and hunting success to decrease with exposure to experimental traffic noise (Figure 3h; Siemers and Schaub 2011). This decrease in foraging success may explain why some predators avoid noisy areas (Figure 3n; eg Schaub *et al.* 2008; Francis *et al.* 2009). Noise also impairs foraging in three-spined sticklebacks (*Gasterosteus aculeatus*), resulting in more unsuccessful hunting attempts (Purser and Radford 2011). Noise also possibly interferes with the ability of prey species to hear approaching predators, which could impact fitness directly. Although likely, elevated predation risk due to noise has yet to be demonstrated, but some evidence does suggest that animals exposed to noise behave as though they are at greater risk of predation. For example, in the chaffinch (*Fringilla coelebs*), continuous noise impairs auditory surveillance, triggering increased visual surveillance, as a result of which the birds spend less time foraging (Figure 3j; Quinn *et al.* 2006). Noise that serves as a distraction may also lead to an increased latency in predator-escape response (Figure 3i; Chan *et al.* 2010), potentially compromising survival. Both distraction and elevated vigilance could also cause a decrease in foraging rates and success (ie a trade-off; Figure 3o; Gavin and Komers 2006; Quinn *et al.* 2006). Collectively, these studies suggest that both interference noise and noise perceived as a threat decrease the rate and frequency at which organisms obtain food. Studies aimed at understanding the extent to which these behavioral shifts

represent a metabolic expense (relevant to survival and reproductive success) will help to reveal the hidden costs of noise exposure.

Changes in mate attraction and territorial defense

The most direct way in which noise may alter an individual’s ability to attract mates or defend its territory is through energetic masking, in which potential receivers are simply unable to hear another individual’s acoustic signals through noise that is frequent or continuous during important temporal signaling windows. Changes made to acoustic signals appear to be an adaptive behavioral adjustment that permits individuals to communicate under noisy conditions (eg Fuller *et al.* 2007; Gross *et al.* 2010; Francis *et al.* 2011b), yet these shifts could also incur a cost. In noisy areas, female great tits (*Parus major*) more readily detect male songs sung at higher frequencies than females typically prefer (Halfwerk *et al.* 2011a). However, males who sing predominately at higher frequencies experience higher rates of cuckoldry (Figure 3l). Great tits breeding in noisy areas also have smaller clutches and fewer fledglings (Halfwerk *et al.* 2011b); similarly, eastern bluebirds (*Sialia sialis*) experience decreased productivity when nesting in areas with elevated noise levels (Kight *et al.* 2012). Paired with patterns of decreased pairing success in noisy areas (Habib *et al.* 2007; Gross *et al.* 2010), these studies suggest that short-term signal adjustments in response to anthropogenic noise might function as evolutionary traps (eg Schlaepfer *et al.* 2002) in which behavioral responses to novel acoustic stimuli could be maladaptive. That is, behavioral shifts to be heard in noisy areas may come with the cost of compromising the attractiveness of the signal to potential mates. This possibility remains to be tested against other potential explanations for declines in pairing or reproductive success, but emphasizes why investigators should measure aspects of fitness in noise-impact studies rather than simply documenting changes in site occupancy or abundance.

Finally, although the list of species known to shift their signals in response to noise is growing, there is at least one frog species and some bird species that do not alter their vocalizations in response to noise (eg Hu and Cardoso 2010; Love and Bee 2010; Francis *et al.* 2011b). More work is needed to provide a thorough understanding of the phylogenetic distribution of noise-dependent vocal change and researchers should strive to publish negative results, as knowledge of the apparent absence of these behavioral modifications is just as important as knowledge of their presence.

■ Linking behavioral changes, physiological responses, and fitness costs

The behavioral changes mentioned above can have direct consequences for fitness (Figure 3r), such as reduced pairing success (Habib *et al.* 2007) or reduced

reproductive success (Halfwerk *et al.* 2011b). However, behavior can influence, and be influenced by, physiological responses (Figure 3p; Kight and Swaddle 2011), which in turn can affect fitness (Figure 3q; Bonier *et al.* 2009). Kight and Swaddle (2011) reviewed many links between noise, physiological stress, and behavioral change, so we only briefly mention them here.

It is well known that increased physiological stress affects fitness (Figure 3q); yet, to our knowledge, a direct link between increased physiological stress due to noise and decreased survival or reproductive success has not been shown in wild animals. The best evidence for this potential link comes from two studies. In one, Blickley *et al.* (2012b) found that greater sage grouse on leks exposed to experimental playback of continuous natural gas drilling noise or intermittent road noise had higher fecal glucocorticoid metabolites (fGMs) than individuals on control leks. The authors suggested that masking of cues likely resulted in elevated stress levels, inhibiting social interactions or leading to a heightened perception of predation risk. In the other, Hayward *et al.* (2011) showed that experimental exposure to motorcycle traffic and motorcycle noise increased fGMs in northern spotted owls (*Strix occidentalis caurina*). In an observational component of the same study, spotted owls nesting in areas with higher levels of traffic noise fledged fewer offspring, even though they did not have elevated fGMs, suggesting that the effects of road noise may have been offset by greater prey availability in noisy areas. These two studies demonstrate that noise may lead to decreased fitness in sage grouse and spotted owls, and also clearly indicate that more research is needed to determine how noise exposure, physiological stress, and fitness are linked in wild populations.

■ Scaling up behavioral responses

Here, we have focused on effects of noise exposure at the level of the individual; however, studies that integrate individual behavior, population responses among multiple species, and species interactions are critical to understanding the cumulative, community-level consequences of noise. Measures of species richness are a good starting point, but may be misleading because species may respond negatively, positively, or not at all to sound stimuli (Bayne *et al.* 2008; Francis *et al.* 2009), individuals within a single species may respond differently to the same stimulus (Sih *et al.* 2004), and individuals that remain in noisy areas may suffer from one or more of the fitness costs discussed above. This variation within and among species in response to noise guarantees that communities in noisy areas will not always be subsets of the species that make up communities in comparable quiet areas. Researchers should couple standard measures of richness and alpha (local) diversity with beta-diversity metrics that reflect variations in the composition of species within communities and among sites.

Nevertheless, additional investigations will be needed to understand why species respond to sound stimuli as they do. Settlement patterns may not hinge on the intensity of noise, but are perhaps due to the presence or absence of cues indicating the presence of predators and heterospecific competitors (Francis *et al.* 2009). These other species (ie predators or competitors) may have unique settlement patterns in response to noise and will complicate efforts to measure how noise directly affects the species of interest. Disentangling these interactions will also be essential to understanding the consequences of noise exposure for organisms that are not directly impacted by noise, such as plants that depend on noise-sensitive faunal taxa (Francis *et al.* 2012) or animals whose hearing range is not tuned to a particular frequency that makes up a sound stimulus.

■ Conclusions

Both policy and scientific literature have often oversimplified the effects of noise on wild animals, typically suggesting that species either are sensitive and abandon noisy areas or are not and remain. In our experience with stakeholders, habituation is an oft-cited reason for persistence and an absence of noise impacts, yet research on other stressors indicates that acclimation to a stressor might not release an organism from costs to fitness (Romero *et al.* 2009). Additionally, we have shown how behavioral modifications among individuals confronted with noise – even those individuals that outwardly appear to habituate – can lead to decreased fitness. Challenging the assumption that habituation to noise equals “no impact” will be difficult, but it will also be a critical component in revealing how a range of behavioral mechanisms link noise exposure to fitness costs. Ideally, we need to predict which combination of noise characteristics and behavioral contexts are most detrimental and under what circumstances behavioral changes affect fitness directly or indirectly. This will require an array of experimental and observational approaches and frameworks that complement the conceptual structure presented here (Figure 3). Other promising frameworks include the risk–disturbance hypothesis (Frid and Dill 2002), which provides an avenue for understanding energetic costs associated with wildlife responses to noise disturbances that are perceived as threats. Studies evaluating aspects of habitat selection and acoustic communication in response to noise may find it useful to frame questions in terms of ecological and evolutionary traps (Schlaepfer *et al.* 2002). Furthermore, investigators should strive to measure responses along a range of noise exposure levels to reveal the shape of response curves (eg threshold, linear) because these details will be indispensable to resource managers and policy makers when establishing and modifying regulatory limits that reflect the ecological effects of noise exposure.

An increase in anthropogenic noise levels is only one of many threats to biodiversity on which ecologists and policy makers should focus their attention. However, rel-

ative to other conservation problems, noise may also offer readily available solutions, which, if implemented, could lead to major, measurable improvements for both wildlife and people. For example, use of noise-attenuating walls could reduce the area of a landscape exposed to elevated noise levels from natural gas extraction activities by as much as 70% (Francis *et al.* 2011c) and similar solutions exist for mitigating noise from roadways and cities (Code of Federal Regulations 2010). These mitigation efforts could come with drawbacks; for instance, noise-attenuating walls near roads could restrict the movement of wildlife and impede gene flow. Nevertheless, as we develop a better understanding of the ecological effects of noise, implementation of mitigation efforts can begin in many well-studied and high-priority systems (eg oil and gas developments in natural areas, transportation networks in national parks), where benefits outweigh the potential costs. In addition to protecting contiguous natural habitat, reducing noise exposure in and around developed areas will not only benefit wildlife populations and diversity, but will also provide adjacent human populations with the suite of physiological benefits afforded by living in a quieter community.

■ Acknowledgements

We thank J Bunkley, K Fristrup, A Keener, N Kleist, B Leavell, T Mason, C McClure, and H Ware for comments on earlier versions of this manuscript. CDF thanks the National Evolutionary Synthesis Center (NSF EF-0905606) for support and JRB acknowledges support from the Natural Sounds and Night Skies Division of the National Park Service (CESU H8R07060001).

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BLM RGFO
3028 E Main St.
Canon City, CO 81201

Re: Issues and concerns to be considered in the proposed use of BLM lands for HAMET activities

Submitted to rgfo_comments@blm.gov via email on 12/19/14

Persons;

Please accept these comments on behalf of the Quiet Use Coalition and other undersigned organizations on proposed analysis of HAMET landing zones (LZ) on BLM lands.

We sincerely appreciate allowing the public an opportunity to comment on this proposal.

While we appreciate the desire to train military personnel by practicing landing in high altitude and mountainous areas that simulate conditions that may be encountered in other areas they may be deployed to, we do not think this activity is appropriate in all locations.

High altitude mountainous BLM terrain provides other values and benefits, including but not limited to: important wildlife habitat; important plant habitat; locations for dispersed recreation such as hiking, camping, hunting; untrammelled locations that offer opportunities to experience solitude; naturalness; and primitive and unconfined recreational experiences, etc.

The analysis of this proposal must include the items that follow.

Limit the LZ to specific locations

We appreciate the aspect of the proposal that identifies a set number of distinct potential LZs, rather than permitting dispersed landing in general areas throughout BLM lands. A fixed number of identifiable potential LZs help confine and concentrate the impacts of this activity to limited areas.

We believe the proposed activities need to be carefully analyzed and considered to properly determine if it is best to disperse this use (LZs in particular) over a larger area /number of LZs or concentrate this use in a more limited number of areas/LZs. There are likely some LZs that may be more appropriate than others for this use.

Do not land or conduct low altitude NOE flights when people or wildlife are present

We appreciate LZs will not be used when humans, livestock or wildlife (particularly big game, elk, deer, antelope, and bighorn sheep) are present.

We think that LZs must not be used when visible evidence of humans is present. A vehicle, a bicycle, a tent or burning campfire, or other visible indicator in the LZ that humans are in the immediate area should also prevent landing.

Identify how the proposed large number of BLM LZ will provide substantive and significant variety

We understand a desire to have a variety of LZ locations that are different from the 16 locations already permitted on USFS land. We strongly believe that the analysis must identify substantive and significant characteristics of the USFS landing zones, and the also how and which BLM proposed landing zone would provide a significant difference.

We question the need to have so many LZs. We feel these landing exercises will have significant negative impacts to humans, wildlife and the ecosystems surrounding these landing sites. We feel it is better to concentrate this high impact activity on a smaller more limited number of landing sites then dispersing it throughout public lands.

The total acreage impacted by a helicopter landing must be accurately portrayed

Significant disturbances such as loud levels of noise, propeller wash, visual impacts (including unnatural lights at night), and likely engine exhaust, unnatural fumes and odors, and dust will impact areas outside of and beyond the small acreages identified for each LZ. The individual and cumulative effects of disturbances that will extend beyond the boundaries of each LZ must be accurately portrayed, considered and analyzed.

The relatively long duration of time in each landing zone must be considered

The HAMET Plan of Development, page 6, indicates that each aircraft would spend approximately 30 minutes in the LZ. It is unclear if this means 30 minutes on the ground or 30 minutes in the vicinity of each landing zone and this needs to be clarified further. Either way, 30 minutes is a significant amount of time to be in an area or this duration increases the impacts of the presence of a large loud machine and humans.

Page 10 of the HAMET plan states that “In all training periods, surface operations will be limited to landing and takeoff, which will not involve any ground operations.” Exactly what will occur with each landing that may take 30 minutes needs to be better defined. The impacts of each landing would vary depending upon: if helicopters land, spend 30 minutes idling on the ground before leaving; repeatedly land and take off from the same landing area within a 30 minute time period, land and shut off an engine before starting it again 30 minutes later before leaving, etc.

Flight paths need to be better defined to avoid certain areas

The fact that flight paths to and from LZs are not defined, and that helicopters will be operating at low altitudes (as low as 500’ AGL outside of MTAs according to the HAMET Plan on page 8) presents additional impacts that must be considered.

Noise of helicopters traveling to and from LZs and MTAs will have a significant impact on humans and wildlife over a large undetermined area. Maximum noise will range from 79-84 dBA (average 81.5 dBA) at low 500’ AGL operation according to the HAMET Plan chart on page 7.

Noise is a significant environmental and ecological pollutant and the impacts of helicopter noise must be fully considered

The impacts of helicopter noise will be significant and cannot be mitigated when experienced by organisms when helicopters are in landing zones or flying at low elevations. Organisms that can flee will do so, and those unable to escape will endure significant stress.

The volume of this noise at such close range will be incredibly loud. The Plan of Development only considers helicopter noise at 200’. As noise dissipates as it moves farther from the source, the amount of noise produced by a helicopter at a distance of 100, 50, 25 feet or less would be even greater.

The analysis must include an accurate determination of maximum helicopter noise dBAs at distances ranging from 25-200 feet, as there will be organisms that will not be able to escape the helicopters and thus would be subjected to higher levels of noise.

The analysis must include an accurate determination of average helicopter noise as they pass by monitoring equipment at 25 feet of distance. This will permit a more accurate analysis of the impacts of helicopter noise flying NOE maneuvers within 1000 meters of LZs.

As a reference humans find noise of 70 dB or greater to be annoying, and 110 dB to be painful.

Humans find helicopter noise to be particularly annoying, according to an FAA study attached.

Noise will be widespread: not limited to LZ but also MAT and flight paths to and from MATs and LZ’s

Noise can be a threat to human health, as evidenced by a 2013 literature review included in the attached file.

Wildlife and humans do not always show visible responses or reactions to noise. Noise can be a significant stressor that can result in significant negative costs for organisms.

The intermittent and unpredictable noise from this use is difficult to adapt to, harder to avoid, and will be perceived as more of a threat by wildlife. Please see the recent literature review and study “A framework for understanding noise impacts on wildlife: an urgent conservation priority” attached.

The potential negative impacts from widespread helicopter noise this proposal may have must be fully considered. Noise will have negative impacts on humans and wildlife.

Avoid sensitive wildlife areas

LZ and low elevation flight paths must avoid sensitive wildlife habitat. This must include areas where surface water is present in the form of springs, seeps, streams, any significant wetlands or ponds/lakes. The entire area being considered for this proposal is very dry and surface water is scarce. Known locations where surface water is present are crucial for wildlife, and wildlife in all forms tends to congregate near these water sources.

There may be habitat for Colorado State or Federal Threatened and Endangered Species that will be impacted by low elevation helicopter flight paths and noise to and from LZs or MTA. This should be identified, considered and avoided.

Wildlife concentration areas, production areas, nesting areas and others must be avoided.

We believe that frequent use of LZs and surrounding NOE training the adjacent areas have the potential to significantly impact wildlife, to the extent that they abandon these areas. It is difficult to quantify how much use will cause wildlife to abandon an area, and we suggest erring on the side of caution when allowing the proposed activities.

Avoid lands with wilderness characteristics

There are a number of proposed LZs within areas that have been identified by citizens as lands with Wilderness Characteristics (LWC). The BLM will be considering these areas in an upcoming Resource Management Plan revision for this Field Office.

These citizen proposed LWCs have been carefully inventoried by citizens as offering outstanding opportunities to experience solitude, naturalness, unconfined and primitive recreation, as well as significantly undisturbed natural soundscapes.

Federal Aviation Advisory circular NO. 91-36D issued in 2004 encourages pilots to fly at an altitude of over 2000 feet when over any LWC and other noise sensitive areas.

[http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/208330d7efad2bf9862570650070769f/\\$FILE/AC91-36d.pdf](http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/208330d7efad2bf9862570650070769f/$FILE/AC91-36d.pdf)

“Paragraph 7. DEFINITION. For the purposes of this AC, an area is “noise-sensitive” if noise interferes with normal activities associated with the area’s use. Examples of noise-sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas (including areas with wilderness characteristics), wildlife refuges, and cultural and historical sites where a quiet setting is a generally recognized feature or attribute.”

We strongly believe flight paths to and from, and landing zones, should avoid any identified areas with wilderness characteristics. This includes Wilderness Study areas, BLM identified LWC, and citizen proposed LWCs.

LZs in citizen LWCs include: 402, 403, 404, 405, 408, 409, 510, 511, 602, 603, 604, 606, 705, 706.

There are 8 additional proposed LZs in the Table Mtn area with which potentially are in lands with wilderness characteristics: 607, 608, 609, 610, 611, 612, 613, and 614. Six of these fall within the BLM identified Arkansas Canyon Area of Critical Environmental Concern, and the impacts of this proposal to that ACEC must be fully considered.

There are 4 proposed LZs near Copper Mtn that are in proposed lands with wilderness characteristics: 501, 592, 503 and 504.

Avoid areas used for recreational purposes

We strongly believe NOE training and LZs should avoid lands that receive moderate to high recreational use. This would include trails, popular roads, and other areas where humans congregate.

Restrictions for use should be considered to avoid these areas during weekends or other periods of high use.

The public should be allowed an opportunity to comment on areas used for recreational purposes identified by the BLM.

The final Plan must be adaptable if biological, social or cultural concerns arise that cannot be mitigated

New information that arises after any final decision must be fully considered, and the final decision must be modified if substantive and significant biological, social or cultural concerns arise that cannot be mitigated.

Ongoing monitoring and review needs to occur

Monitoring of wildlife use patterns, recreationists and recreational use, and residents living along potential flight paths needs to be conducted. Often times the impacts of implementing a decision are not fully apparent until after implementation. The decision must allow adaptive management to mitigate any problems that are identified with monitoring.

Seasonal closures to landing need to occur in big game hunting seasons, big game winter range, and bighorn sheep and elk production areas.

We have identified current elk, deer, pronghorn, and bighorn sheep winter range and winter concentration areas in proposed LZs. Also an elk production area for LZ 615 and 616. There are also Turkey winter concentration areas that overlap with at least one LZ. (All according to current 2013 CPW data).

A 2007 EA for similar helicopter training on adjacent USFS lands had seasonal restrictions on landing in these types of important wildlife areas. These restrictions must also be applied to landing in these important areas on BLM lands.

Impacts of NOE training need to be fully considered

The significant and potentially stressful impacts of helicopters flying within 25 feet of the ground within 1000 meters of an LZ must be fully analyzed and considered. Such low elevation maneuvers could have significant negative impacts on vegetation, wildlife (including potential collisions with birds flushed from trees), humans and nests must be fully considered. Intense noise, propeller/rotor wash, visual impacts (including unnatural lights at night), and likely engine exhaust, unnatural fumes and odors, and dust will occur as a result of these maneuvers. This training effectively spreads many of the negative impacts of landing over a much larger area than the LZ itself.

The force and impacts of air movement resulting from helicopter propellers/rotors and helicopters moving through the air at low elevations must be considered

The analysis must disclose and fully analyze and consider the potential force of air movements generated by helicopters flying within 25 feet of the ground in certain locations. The force and direction of this air movement must be quantified and disclosed.

The unpredictable and sudden movement of this air could potentially be strong and violent enough, and come from unnatural directions, so as to result in damage to flowering plants, amphibian eggs in water, small, lightweight or young species of wildlife, etc. It could have the potential to flush and kill birds, violently blow birds around, displace eggs and young from nests, destroy nests, etc. It could potentially collapse a tent, blow ashes from a campfire beyond a fire ring (starting a wildfire), knock over a hiker or mtn biker, etc.

Have modified helicopters that have limitations which would simulate high altitude conditions been considered?

While not experts, it seems possible to construct specially modified helicopters that would perform similarly at low elevations to the way helicopters perform at high elevations. (Engine power and rotor blade modifications would be possible). This could allow some simulated high altitude training to occur at low elevations near Ft. Carson. This would save money, time and resources and lessen impacts to public lands.

Thank You for this opportunity to comment.

Sincerely

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Re: HAMET Comment

1 message

nancy radecki <nancyradecki@gmail.com>

Tue, Nov 4, 2014 at 8:46 AM

To: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

Thank you.

Since my personal letter was undeliverable, I would like to attach the corrected version here for submission.

Again, thank you for all of your hard work.

Nancy J. Radecki

On Mon, Nov 3, 2014 at 10:08 PM, RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov> wrote:

Thank you Ms. Radecki for your comments. We will add your name to our mailing list. We will be back in touch as soon as we have a document for review.

On Sun, Nov 2, 2014 at 8:10 PM, nancy radecki <nancyradecki@gmail.com> wrote:

U.S. Dept. of the Interior, Bureau of Land Management

Royal Gorge Field Office

Attention: Nancy Keohane

As the business owner of the local country store in Southwestern Teller County, Evergreen Station, I would like to express my concern regarding the affect HAMET could have on the economy in the area.

Our business increases significantly in the Summer and Fall due to part time residents, tourism, and outdoor enthusiasts (hunters, campers, fishermen, hikers, etc.). We are on the Gold Belt Tour Scenic Byway, a few miles south of Florissant Fossil Beds National Monument. This brings many tourists to the area of HAMET. The Gold Belt Tour Map and the Plan of Development HAMET maps show Landing Zones in close proximity.

<http://www.goldbeltbyway.com/map>

If tourism and part time resident numbers decline, there could be a significant negative effect on the economies of Teller, Park and Freemont Counties.

Hence, the upcoming Environmental Assessment should address the impact on the following:

- Local Economy (Ranching, Property Values, Businesses, Camps, Vacation Rentals, Outfitters, etc.)
- Residential Property Values and Quality of Life
- Tourism
- Public Land Use (e.g. Hunters, Campers, Fisherman, Hikers, Gem Hunters and their safety)

- Distracted Drivers

- Wildlife

Sincerely,

Nancy J. Radecki

Managing Member

Evergreen Station Enterprises, LLC



Final HAMET letter.docx
19K

I am writing to you, The Bureau of Land Management, Royal Gorge Field Office, as you have expressed your desire for input on Fort Carson's proposal to use public lands for helicopter training. This scoping process has come to our attention in the last week. The scope of my concern is deep and broad and I will attempt to express it in full here. Since you specifically asked for areas of concern and suggestions, I am putting those in italics.

I first would like to express my thanks to the Army and all of the Armed Services for their dedicated service to our country. The deployments and hardships are extensive. It is absolutely imperative that if we are deploying our troops, they are trained and proficient in high altitude flight techniques and in the differences in the performance of their aircraft under different circumstances.

25 years ago, in January, my husband and I bought our home in Lakemoor West Subdivision, Florissant, Colorado. We were pregnant with our first son and wanted to buy our family forever home. My husband is an engineer and we knew that his work would require frequent moves on assignment. This home would be the roots for our family, forever. Our family grew to include 4 sons who call this home.

Our family enjoys the great outdoors. We fish, hike, climb the mountains, hike to Cripple Creek, and just sit enjoying nature and all that it brings. I am a stargazer and sleep under the stars regularly. Our neighbors are regularly seen walking for exercise or riding their bikes, horses or motorized toys in the area. We all love our home here in the mountains. We chose it with the knowledge that we were surrounded with BLM and all of the recreation opportunities that brings both now and for generations to come. We use the BLM for recreation and so do many others. It is for the public.

This week has been a roller coaster of emotion since someone in the neighborhood read a small article and we all found out about the possibility of being immediately (in very close proximity) surrounded by 6 Landing Zones for HAMET in MTA 7 plus another LZ just South of us on Booger Red Hill, LZ410. Not only will our home and neighbors be surrounded with extreme noise, percussive vibration, dust and disruption, but the BLM land in our area will possibly (though, I fear most certainly) be filled with an additional 38 LZs for high frequency helicopter landings, takeoffs, low level, contour and NOE training as defined in the Plan of Development High Altitude Mountain Environment Training (POD HAMET).

I am not an engineer, an attorney or a scientist. I have no formal training that would give me any expertise that would help define professionally my concerns. My life is dedicated to the service of others. I will do the best I can here to express the gamut of my concerns.

According to the POD HAMET document, paragraph 1, section1, Purpose and Need: Fort Carson's Combat Aviation Brigades (the tenant unit) as well as Combat Aviation Brigades throughout the Army and "other armed services" (non-tenant units) will receive HAMET training on these Landing Zones in order for pilots to become proficient at High Altitude Operations. I have great concern as to the estimate of landings per LZ when there is no clear limitation or definition of the "Occasional use" by the USMC, USAF and US Navy. All armed services have helicopters.

Based on the numbers in the POD HAMET, there will be a minimum of 16.25 landings, per year, per LZ [if all of tenant pilots can become proficient with 2 practice landings each (day be 1440 landings, per year,

per LZ for non-tenant pilots (I assume the proficiency element comes into effect here as well). Every landing must have a takeoff so, with 7 LZs surrounding our valley, this works out to be almost 20,000 landings and takeoffs in an approximate 6 square mile area.

While wondering why a Brigade from Hawaii was considered a tenant unit, I came across The Final Environmental Assessment, High Altitude Military Environment Training , Dept. of the Army, 25th Combat Aviation Brigade, Hawaii, September 2011. This report indicates that maneuvers in LZs would include multiple touch –and go, hover, short-stop approach, full-stop landing, and elevated (100' -500') reconnaissance over the LZs per HAMET training requirements. This shows that there will be a lot more activity than we can possibly imagine and a lot more than is being explained to us at this point.

POD HAMET states that non-tenant training will consist of 2 “very concentrated” continuous operations (day, night, weekends and holidays) for approximately 90 days. So dividing the number of landings and takeoffs by 365 days a year would not really be an accurate analysis. Some days, weeks and months will be worse than others.

With this incredible number of flights not only will noise and vibrational disturbance be an incredible issue, so will dust. It seems to me that the wind from the rotors, so intensely concentrated in small areas, will cause a drying effect on the soil and the vegetation causing impaction and erosion. The surrounding trees will be dried out as well increasing the risk of fire. There needs to be a flight ban in any area with a Stage II Fire Restriction. Waiting for Stage III is far too dangerous.

When there is dust and erosion there is also the possibility of fouling the water in our streams with high particulate run off thus cutting off oxygen for living organisms. Noise studies, Vibrational studies, Particulate Studies on air and water quality and environmental, human and animal health impacts all need to be studied and considered.

I do not think that there is anyone who would think that this kind of military activity should occur so close to a populated area. The Plan of Development refers to the large number of helicopter accidents that occur in high altitude. Not only does this point out the serious need for training but also the danger to those in the area of the training. *Environmental Issues: Safety, Quality of life, Property values*

Now for those of us who can't speak, the wildlife. We are surrounded by wildlife. There are bighorn sheep, elk, deer, bear and mountain lions to name some. I read the report by The Coalition of the Upper South Platte, CUSP, and noticed many of the landing zones are within Bighorn Range but, I also know from experience, that we are *in Elk Range. Elk are often in the fields on the North end of our valley.* There are also mountain lions in close proximity to our valley that I am sure, by their nature, will be highly affected by the constant barrage of high decibel noise and vibration. All of these animals will flee, some to return, if the flights were to stop. But, it doesn't seem that the flights will ever stop based on the magnitude of landings predicted. *Maps indicating mountain lion, bear and wolf areas need to be added.* This is of great concern. The pilots will never know when wildlife is present. They will never know when I am present. We will both be hiding in fear from the noise and vibration. (Section 5 Operational Consideration, subsection c) *Flora and Fauna species need to be addressed. The migration routes of ducks and geese that fly this valley also need to be mapped.*

The Executive Summary, HAMET, Hawaii, noted that the need for training of aviation brigades who were to conduct combat operations in Afghanistan let the US Army Forces Command to develop HAMET for high altitude (up to 14,000') training for their aviation brigades. As I look at the "additional 43 LZs" as referred to in Table 2.1, the number of LZs per altitude range is as follows: 6268' to 6586' = 4 (MTA 5), 7313' to 7998' – 14 (MTAs 4, 5 & 7), 8092' to 8998' – 17 (MTAs 4, 5, 6E & 7), 9021' to 9509' – 6 (MTA 6E & 6W) and 10,242' to 10,646' – 2 (MTA 6W). Afghanistan's mountains overall are much higher in altitude reaching 24,580' at Noshaq Mountain. Although the crossing from Afghanistan to Pakistan involving Khojak Pass in Pakistan is 8,881', I would think that *flight training at even higher altitudes would be more helpful especially when you take into consideration the added extremes in temperatures both cold and hot in that region as well as the months of snow cover.*

I would like there to be an examination of putting HAMET LZ training above tree line. These LZs could be placed somewhere without a residential population in a high volume tourism area, possibly closer to the Continental Divide. Thus greatly reducing the risk to people and big game. This would greatly reduce the concerns of Section 5: Operational Considerations.

Another option is the BLM that is closer to Fort Carson. It may have the appropriate elevation and be closer to the urban area where big game is not as prevalent. There are many other areas in BLM that can be considered. I would like to also suggest that the Mountain Training Areas not be so closely oriented to each other. This makes a heavy burden for one area to carry.

The POD HAMET refers to "43 additional LZs". I cannot find any definition of what already exists. Please define in the final report. If you calculate the minimum figures of 1456.25 landings, per LZ, per year x 43 that equals 62,618.75 + 62,618.75 takeoffs = 125,237.5 within a very small area of Colorado. Approximately 20 miles wide by 30 miles long.

I know a thousand other things have crossed my mind this week. I am sure you, who have dedicated so much to the BLM and its mission, know of even more environmental concerns. I know you will do an excellent job in your study and in your Environmental report. This is a very daunting task. I comment you.

Thank you for your time and consideration,

Nancy J. Radecki

Lakemoor West Resident

SW Teller County



Re: Helicopter High Altitude Mountain Environment Training (HAMET)

Keohane, Nancy <nkeohane@blm.gov>

Wed, Dec 17, 2014 at 5:18 PM

To: skyjmp1 <skyjmp1@yahoo.com>, BLM_CO RG_Comments <rgfo_comments@blm.gov>

Cc: Sue Raney <sueraney@live.com>, John Raney <crude_rewards@hotmail.com>

Thank you Mr. and Mrs. Raney for your comments. I will add you to our mailing list and will be back in touch as soon as we have material for review.

Thanks. Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Thu, Dec 11, 2014 at 4:42 PM, skyjmp1 <skyjmp1@yahoo.com> wrote:

To Whom This May Concern,

My name is John Raney. My wife, Susanne & I live at 560 Cap Rock Drive, Canon City, CO 81212. With respect to the proposed HAMET training in our area & the BLM land that is attached to our state land lease, I would like to voice my concerns & aversion to this proposal.

This area has a great deal of folks, like myself, leasing land to graze our livestock on, hunt on & enjoy the peace, quiet & tranquility that it provides. While I respect the US Military & all the men & women of the various branches do to protect our nation, I understand the need for training events, However, I cannot & will not condone these maneuvers. I have no idea if this is a voting situation, or simply a voice of concern, however if indeed feedback is welcome, our thoughts are for the Army, or any branch of the service, to find a much more remote & less populated area to hold these types of training exercises.

Respectfully John & Susanne Raney

"Don't Just Dream It....Live It"
Crude Rewards Ranch
John & Sue Raney



Fwd: FW: Helicopter High Altitude Mountain Environment Training (HAMET)
(UNCLASSIFIED)

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Tue, Dec 30, 2014 at 7:21 PM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: Johnson, Daneta J CIV USARMY USAG (US) <daneta.j.johnson.civ@mail.mil>
Date: Fri, Dec 12, 2014 at 8:34 AM
Subject: FW: Helicopter High Altitude Mountain Environment Training (HAMET) (UNCLASSIFIED)
To: "nkeohane@blm.gov" <nkeohane@blm.gov>, "Sullivan, Kyle" <ksullivan@blm.gov>, "Kimber, Kenneth W
CW4 USARMY (US)" <kenneth.w.kimber.mil@mail.mil>, "Gamer, Billie J CIV (US)"
<billie.j.gamer.civ@mail.mil>, "McNutt, Doraine K CIV USARMY USAG (US)" <doraine.k.mcnutt.civ@mail.mil>

Classification: UNCLASSIFIED
Caveats: NONE

FYSA

Dani Johnson
Chief, Media Relations
Fort Carson Public Affairs
719-526-4143
DSN 691-4143
Blackberry: 719-338-0506
daneta.j.johnson.civ@mail.mil

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

From: skyjmp1 [mailto:skyjmp1@yahoo.com]
Sent: Friday, December 12, 2014 8:16 AM
To: Johnson, Daneta J CIV USARMY USAG (US)
Cc: John Raney
Subject: Fw: Helicopter High Altitude Mountain Environment Training (HAMET)


To Whom This May Concern,

My name is John Raney. My wife, Susanne & I live at 560 Cap Rock Drive, Canon City, CO 81212. With respect to the proposed HAMET training in our area (Beckham Basin, Fremont County) & the BLM land that is attached to our state land lease, I would like to voice my concerns & aversion to this proposal. This area has a great deal of folks, like myself, leasing land to graze our livestock on, hunt on & enjoy the peace, quiet & tranquility that it provides. While I respect the US Military & all the men & women of the various branches do to protect our nation, I understand the need for training events, However, I cannot & will not condone these maneuvers. I have no idea if this is a voting situation, or simply a voice of concern, however if indeed feedback is welcome, our thoughts are for the Army, or any branch of the service, to find a much more remote & less populated area to hold these types of training exercises.

Respectfully John & Susanne Raney

"Don't Just Dream It....Live It"
Crude Rewards Ranch
John & Sue Raney

Classification: UNCLASSIFIED
Caveats: NONE

 smime.p7s
6K



Fwd:

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Thu, Jan 29, 2015 at 4:16 PM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: Jerry San Pietro <jsanpietro@att.net>

Date: Wed, Oct 29, 2014 at 6:07 PM

Subject:

To: "nkeohane@blm.gov" <nkeohane@blm.gov>

Cc: Stephen Witcher <s.witcher@ccvnet.net>, "candicelyn57@gmail.com" <candicelyn57@gmail.com>

I am writing to you to express my opinion concerning the proposed LZ above the subdivision of Lakemoor West. This has been a peaceful and tranquil area since I have been here since 1987. I feel that if this proposal is granted this tranquility will be ruined and our property values will be greatly harmed. I am also concerned as to the danger if there was a crash or hard landing as it would put these homes and residents in danger of losing their homes and or lives. I also hunt there as do others because it contains a lot of game and with all the noise and commotion this would be a thing of the past.

Please, I implore you to not grant this proposal because of the reasons that I have outlined above.

Thank you for your consideration,

Sincerely,

Jerry San Pietro



Re: Residence in Lakemoor West

Keohane, Nancy <nkeohane@blm.gov>

Wed, Dec 17, 2014 at 2:20 PM

To: Candice SanPietro <candicelyn57@gmail.com>, BLM_CO RG_Comments <rgfo_comments@blm.gov>

Cc: Steve and Sandy Witcher <s.witcher@ccvnet.net>

Thank you for your comments Mr. and Mrs. SanPietro. We will place your name on our mailing list and will be back in touch as soon as we have a document for your review. Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Wed, Dec 17, 2014 at 2:41 AM, Candice SanPietro <candicelyn57@gmail.com> wrote:

To whom it may concern,

I want to let you know that my family and I emphatically do not support having the "chopper training" and "proposed landing zones" placed in or near Lake moor West. I do not think this is safe for the habitat, residents, or student pilots in training.

The burdens associated with "flying over homes" adds additional stress for all involved. The mountains may emulate the terrain / weather for combat situations but that is not the only consideration when a multitude of folks will be placed at risk every time a chopper takes off.

In addition, the wildlife is a relevant consideration especially given the "Federally Protected" animals. The noise alone at all hours of the day will devastate the habitat not to mention the possibility of accidents and potential fire hazards.

We are a small community and DO NOT have the capability of managing chopper accidents and potential fire hazards due to their escalated danger potential. We are also remote which makes the provision of additional resources in a timely manner challenging if not impossible.

I do not know of any precedence that legally allows the BLM to make deals with the Army outside of congressional approval. It seems that this has been a "back door" proposal with the taxpayer considered last. The way the situation has been handled has ultimately stirred up tremendous frustration among neighbors. It has certainly undermined any trust in our family that either group, BLM or Army personnel, are interested in perspectives contrary to their agendas. Ethically, integrity appears to have been compromised. It is evident to many that the public has not been the priority for the past 18 months.

This situation should be about safety, responsibility and accountability. I trust that the BLM will take these concepts seriously when looking at the proposals given that the habitat, wildlife, and public should be their primary concern.

Military training IS NOT the responsibility of the BLM nor should it be conducted at the risk of what the BLM was established to protect.

In closing, I fully support the military as I served per active duty from 1975 to 1978 in addition to 6 years of "Reserve Status". Supporting our troops IS NOT the issue. That argument is similar to the "race card" that we hear so much about to excuse criminal behavior due to racial affiliation. I resent having to revisit this every time I hear a proponent voice their opinions because it serves as a distraction from the real issues at hand.

Thank you for your time,

Candice and Jerry SanPietro
1125 Lakemoor Drive, Florissant, CO 80816
7196890991



Fwd: HAMET

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Mon, Dec 29, 2014 at 12:22 PM


Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number


----- Forwarded message -----
From: Aaron Mandel <wildfire@guffeyfire.net>
Date: Tue, Dec 23, 2014 at 2:03 PM
Subject: HAMET
To: nkeohane@blm.gov

Hello Nancy,
Here is a copy of the letter you requested stating my Districts concerns.
I have also send a signed original by snail mail. I hope to meet with you
soon to address some of these concerns. Thanks and Happy Holidays.

Aaron Mandel
Acting Chief
South Park Fire Dist.

2 attachments

 Hamet Letter Final.doc
134K

 Scan.pdf
584K



AARON MANDEL
ACTING CHIEF
S.P.C.F.P.D.

P.O. Box 11
Guffey, Colorado 80820
Phone (719) 689-9479
Email wildfire@guffeyfire.net

December 22, 2014

Nancy Keohane
Bureau of Land Management
Royal Gorge Field Office
3028 East Main Street
Canon City, CO. 81212

Ms. Keohane,

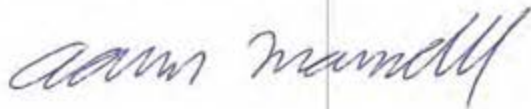
This letter is in regards to the conversation we had on December 8th of this year about the proposed HAMET project operating on BLM lands. Per your request this letter is to state the concerns of the Southern Park County Fire Protection District formally to you and the military. Our goal is to make sure plans are in place and responsibilities assigned so that in the event of an accident we all have clear direction on who is in charge and what responsibilities our district would have.

One of our concerns is will the HAMET program affect our use of air ambulances? Our district is only able to provide basic life support so when we need a higher level of medical response we rely heavily on Flight for Life. If these training flights, conducted by the military, restrict air access to our community it will endanger our patients' lives. Paramedics would have to come from Fairplay, Cripple Creek, or Divide. The time it takes to get to our district from these locations and to a hospital could cost lives and affect patient outcomes.

Another concern is in the event of a crash on private lands in our district who is responsible? Our district is understaffed and we have limited resources to respond to a helicopter incident. In addition, if a crash were to turn into a wildfire, who is responsible for covering the cost of fighting that wildfire? As we are all aware wildfires can be very costly to fight and our agency cannot bear those costs. If the wildfire were on BLM land would the district be working under current CRRF agreements where we provide mutual aid at no cost for the first 24 hours and bill after that? If so, who do we bill? Our district can not afford to have the HAMET program become a financial burden on our department.

These are the main concerns of our district. I'm sure all of our concerns can and may already be addressed through memorandums of understanding and mutual aid agreements, but we need to clarify these concerns. I look forward to meeting with you again as this process moves forward and appreciate all the hard work you are putting in to get feedback from affected Emergency Services.

Respectfully,

A handwritten signature in cursive script that reads "Aaron Mandel".

Aaron Mandel
Acting Chief
Southern Park County Fire Protection District (S.P.C.F.P.D.)



Fwd: Additional comments and questions on the Gray Eagle EA

Keohane, Nancy <nkeohane@blm.gov>

Mon, Feb 2, 2015 at 12:18 PM

To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----

From: Bill Sulzman <bill.sulzman@gmail.com>

Date: Mon, Feb 2, 2015 at 11:32 AM

Subject: Fwd: Additional comments and questions on the Gray Eagle EA

To: "Keohane, Nancy" <nkeohane@blm.gov>

Hi Nancy, I'm forwarding a copy of my comment on an EA done by Fort Carson on the Gray Eagle UAV. Note the highlighted paragraph. I believe you should check into that.

----- Forwarded message -----

From: Bill Sulzman <bill.sulzman@gmail.com>

Date: Mon, Feb 2, 2015 at 10:19 AM

Subject: Fwd: Additional comments and questions on the Gray Eagle EA

To: Bill Sulzman <bill.sulzman@gmail.com>

----- Forwarded message -----

From: Bill Sulzman <bill.sulzman@gmail.com>

Date: Mon, Feb 2, 2015 at 10:18 AM

Subject: Additional comments and questions on the Gray Eagle EA

To: usarmy.carson.imcom-central.list.dpw-ed-nepa@mail.mil

After additional research I have additional comments and questions concerning the deployment of Gray Eagles at Fort Carson:

- What exactly is the origin of the Gray Eagle UAV's name? Answers I've found are unclear. Is it named after an Army hero or an Indian chief? Cherokee or Lakota tribe?
- The literature I have found indicates that the Gray Eagle can carry not only Hellfire missiles but also Viper bombs and Stinger missiles. Why are these not mentioned in the EA?
- Just to be clear why should we not expect the training area for the Gray Eagle to be expanded to places like PCMS and Bullseye. The Colorado Springs Business Council says it will be used at PCMS in the future. There is a hint of this in the EA implying that future inclusion of PCMS use would include the necessity for a new EA before going forward? Sounds like a formality.
- A study of background information also reveals that an important part of the Gray Eagle mission is to coordinate with the Apache helicopter in attack scenarios. Since many of these scenarios would include high altitude (HAMET) missions why should we not expect to see expansion of use in joint Apache-Gray Eagle high altitude training involving BLM airspace? A new EA could clear the way for that, right?

- Another possible change could be firing Gray Eagle munitions into the impact range at Fort Carson. Much larger explosives are already dropped and detonated there by the Army, Air Force and National Guard. Why not the hellfire missile? Another EA?
- There is information that the scenario in the EA that describes what would happen if the remote control link fails is misleading. In one account I've read it indicates that only 2 out of 3 rogue UAV's in one such event landed as planned. One strayed way off course before running out of fuel and in another case a UAV had to be shot down by the Air Force.

—
Bill Sulzman

P.O. Box 915
Colorado Springs, CO 80901
[\(719\) 389-0644](tel:(719)389-0644)
bill.sulzman@gmail.com

—
Bill

P.O. Box 915
Colorado Springs, CO 80901
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bill.sulzman@gmail.com

—
Bill

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[\(719\) 389-0644](tel:(719)389-0644)
bill.sulzman@gmail.com



Hamet comment

Bill Sulzman <bill.sulzman@gmail.com>

Thu, Dec 4, 2014 at 8:35 AM

To: rgfo_comments@blm.gov

To Royal Gorge field office of BLM

I have a number of comments and questions concerning the Environmental Assessment of Army and other military helicopter use of BLM Landing Zones (LZ's) in the Canon City, Victor, Cripple Creek and Guffey areas.

What are the air use corridors for access to the 43 BLM LZ's? Are these same corridors sometimes used by flights going to and from United States Forest Service (USFS) LZ's in the same general area? Are the Stage Coach Road and Gold Camp Road routes in use already or will they be included in the future?

Would there be missions which would use BLM and USFS sites in the same training exercise? Could sites such as Mt Rosa, Almagre and Sheep's Nose Mountain be included in exercises in the Victor, Cripple Creek and Guffey areas? Is this already happening? Will the Manitou Springs and Broadmoor areas see heavier airspace use as part of this proposal?

It is my understanding that the original 20 BLM landing zones designated for use in 2010 were selected by the CAB at Fort Hood TX and a Colonel from Fort Hood brought an already completed map to BLM for rubber stamp approval? Were the other use installments determined in the same way? Does the selection process include BLM personnel either in the air or on the ground as new zones are added? Will new sites be added in the future by the same means?

It is my understanding that Fort Carson wants new landing zones in the San Isabel National Forest as part of the agreement renewal with the USFS to be completed in 2017. How is that factored into this current Environmental Assessment?

It was mentioned in the Canon City meeting that there will be other military users of the LZ's in questions. What are the details? How much will the National Guard, the Air Force and 16th Special Forces Group use these sites?

A stir was created a few years ago when Special Forces units from Fort Carson conducted a parachute exercise using the Canon City airport? Is the Canon City Airport still used in that fashion? Are similar Special Forces exercises set for the BLM LZ's? Is the Canon City Airport part of the training package envisioned in this EA?

—
Bill

P.O. Box 915
Colorado Springs, CO 80901
(719) 389-0644
bill.sulzman@gmail.com



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Independent story with links Cec 8 - 14

Bill Sulzman <bill.sulzman@gmail.com>

Tue, Dec 9, 2014 at 7:49 AM

To: rgfo_comments@blm.gov

<http://www.csindy.com/IndyBlog/archives/2014/12/08/army-helicopter-training-meeting-draws-crowd>

—

Bill

P.O. Box 915
Colorado Springs, CO 80901
(719) 389-0644
bill.sulzman@gmail.com



Re: FW: HAMET Project - Guffey, CO (UNCLASSIFIED)

Keohane, Nancy <nkeohane@blm.gov>

Wed, Dec 17, 2014 at 1:55 PM

To: "Garner, Billie J CIV (US)" <billie.j.garner.civ@mail.mil>, BLM_CO RG_Comments <rgfo_comments@blm.gov>
Cc: "Kimber, Kenneth W CW4 USARMY (US)" <kenneth.w.kimber.mil@mail.mil>, "Sartori, Timothy E MAJ USARMY 4 ID (US)" <timothy.e.sartori.mil@mail.mil>, "Young, Quentin E CW2 USARMY 4 ID (US)" <quentin.e.young.mil@mail.mil>, "Tajeron, Fredrick S CIV (US)" <fredrick.s.tajeron.civ@mail.mil>

Thanks Billie!

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Tue, Dec 16, 2014 at 5:18 PM, Garner, Billie J CIV (US) <billie.j.garner.civ@mail.mil> wrote:

Classification: UNCLASSIFIED

Caveats: NONE

Hello Nancy! I just wanted to forward one of the nice messages we have received. See below.

VR,
- Ms. Billie Garner
Fort Carson Garrison Public Affairs
Chief, Community Relations
ATTN: IMCR-PA
1625 Ellis St., Bldg. 1218, Rm. 323
Fort Carson, CO 80913-5119
(719) 526-1246 - DSN 691
(719) 526-1021 - FAX
billie.j.garner.civ@mail.mil or billie.garner@us.army.mil

Official Mailing Address:

Department of the Army, Garrison Public Affairs Office IMCR-PA, 1626 Ellis Street, Bldg. 1118, Ste. 200 Fort Carson, CO 80913

Your opinion is important - Please tell us how we are doing:

https://ice.disa.mil/index.cfm?fa=card&service_provider_id=95425&site_id=437&service_category_id=2

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

From: Garner, Billie J CIV (US)

Sent: Tuesday, December 16, 2014 5:16 PM

To: 'Carol Todd'

Cc: McNutt, Doraine K CIV USARMY USAG (US); Martinez, Peggy S CIV USARMY IMCOM CENTRAL (US); Mayne, Anthony R CIV USARMY USAG (US); Anderson, Randall E CTR USARMY IMCOM CENTRAL (US)

Subject: RE: HAMET Project - Guffey, CO (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Good afternoon Ms. Todd! We sincerely appreciate your positive comments.

For your information, we strive to keep noise issues and other disruptions to a minimum by enforcing Fort Carson policies and procedures that regulate limits for local residential areas. While Fort Carson's primary purpose is to maintain mission readiness for the benefit of the country, it must also consider the needs of the surrounding community.

While we appreciate the positive remarks, we also take seriously the concerns of the community and do all we can to ensure we are acting as responsible neighbors and are in compliance with applicable rules and regulations.

Again, thank you.

I hope you've had a nice day.

VR,

- Ms. Billie Garner

Fort Carson Garrison Public Affairs

Chief, Community Relations

ATTN: IMCR-PA

1625 Ellis St., Bldg. 1218, Rm. 323

Fort Carson, CO 80913-5119

(719) 526-1246 - DSN 691

(719) 526-1021 - FAX

billie.j.garner.civ@mail.mil or billie.garner@us.army.mil

Official Mailing Address:

Department of the Army, Garrison Public Affairs Office IMCR-PA, 1626 Ellis Street, Bldg. 1118, Ste. 200 Fort Carson, CO 80913

Your opinion is important - Please tell us how we are doing:

https://ice.disa.mil/index.cfm?fa=card&service_provider_id=95425&site_id=437&service_category_id=2

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

From: Carol Todd [mailto:ctoddelvis@gmail.com]

Sent: Tuesday, December 16, 2014 11:24 AM

To: USARMY Ft Carson HQDA OCPA List PAO COMREL

Subject: HAMET Project - Guffey, CO

I don't mind helicopter training in my area at all. I worked for NORAD for 37 years, and when we got complaints about aircraft noise, our reply was, "That is the sound of freedom." I still believe that. Bin Laden would be alive yet if there had been no helicopter training out here at this altitude (equal to Afghanistan & Pakistan) a few years ago.

Carol J. Todd

4-Mile Ranch Subdivision

Witcher Mountain area

Guffey, CO

Classification: UNCLASSIFIED

Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE



Requested Comments on HAMET

Carol Todd <ctoddelvis@gmail.com>

Thu, Dec 18, 2014 at 1:31 AM

To: Nancy Keohane <rgfo_comments@blm.gov>

Cc: Mary Alice Bross-Evans <mabe219@msn.com>, billie.j.garner.civ@mail.mil, coloradoprop@gmail.com

High Altitude Mountain Environment Training (HAMET)

The Bureau of Land Management Royal Gorge Field Office wants your input on Fort Carson's proposal to use public lands for helicopter training. Fort Carson has used public lands in the Royal Gorge Field Office for High Altitude Mountain Environment Training since 2010 on a temporary and infrequent basis. In 2013, Fort Carson requested a longer term agreement with the BLM for HAMET activities. The HAMET program is designed to provide pilots experience flying and landing helicopters in high elevation, mountainous terrain. Fort Carson has submitted a Plan of Development to the BLM. The BLM is analyzing this plan through an open public process, and would like your help to identify what issues and concerns should be addressed in the environmental assessment before the BLM begins drafting the document. For more information about the use of BLM lands for HAMET activities, please visit the Royal Gorge Field Office website at: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

This scoping period will run from Oct. 1 to Nov. 1, 2014. Comments concerning the proposed action, alternatives and identification of environmental issues are most helpful. For additional information or to submit a comment, please contact Nancy Keohane at [719-269-8531](tel:719-269-8531) or email comments to rgfo_comments@blm.gov. Keep up with Royal Gorge Field Office planning efforts

at <http://blm.gov/3zld>. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Comments:

I am looking at the BIG picture here, the future of the United States of America.

We are free to complain about all the awful and scary things that might happen with helicopters: our property values (money!), noise, compacted soil, scaring people and animals, lighting up my bedroom (I wish!), declining tourists, car wrecks while looking up, and on and on.

But have you thought of the consequences of no high altitude training for our military? Afghanistan and Pakistan have high altitude mountains. Bin Laden would still be alive if there had been no high altitude helicopter training out here a couple of years ago. The only similar terrain with comparable mountains and elevations near a major military base in the lower 48 states is RIGHT HERE IN OUR AREA OF COLORADO. Fort Canson's Pinion Canyon, Holloman AFB, NM, or Fort Drum, NY, do not have the required altitudes. Even Vail was begun by the 10th Mountain Division of military men who trained at Ski Cooper for fighting in Afghanistan many years ago.

I'd rather endure some home-grown hardships now, than live under Sharia Law later (or maybe sooner). Life will be a lot more difficult in those burkas.

Frankly, I feel proud to be able to give my support and be a part of this training program. My retirement flag flew over the U.S. Capitol on Pearl Harbor Day 1994, and it now flies over my deck at the foot of Witcher Mountain. Whenever I hear a helicopter, I run out and wave at it.

Carol Todd, 10860 CR 102, Guffey, CO 80820
4-Mile Ranch
Witcher Mountain



O Beautiful Pikes Peak.jpg
528K

December 23, 2014

Via email (rgfo_comments@blm.gov)

Keith Berger, Field Manager
BLM Royal Gorge Field Office
3028 East Main Street
Cañon City, Colorado 81212

Re: High Altitude Mountain Environment Training (HAMET) Proposal

Dear Mr. Berger,

Thank you for the opportunity to submit scoping comments on the US Army Fort Carson's proposal to conduct High Altitude Mountain Environment Training (HAMET) activities on the public lands managed by the Royal Gorge Field Office. We support BLM completing National Environmental Policy Act (NEPA) analysis for this proposal, as it would have significant impacts on the public lands resources in the Royal Gorge Field Office, including specially designated areas, wilderness and recreation resources. We note that BLM previously declined and/or limited HAMET activities in some of these areas through its coordination with Fort Carson on casual use activities (see casual use letter dated May 1, 2013, attached to these comments), and support BLM's robust review of Fort Carson's HAMET activities in the past. BLM should continue to take a close look at potential impacts from the current Plan of Development, and eliminate, minimize and mitigate those impacts based on this NEPA analysis and its multiple use mandate, which includes protecting wilderness and recreation values.

I. Policy and Legal Framework

a. Federal Land Policy and Management Act

The Federal Land Policy and Management Act (FLPMA), 43 U.S.C. § 1701 *et seq.*, imposes a duty on BLM to manage the public lands for multiple use and sustained yield, including by identifying and protecting the many natural resources of the public lands. Multiple use management requires BLM to consider the various resources and values of our public lands and ultimately manage the majority of our public lands for the many benefits that they provide to all Americans.

The HAMET activities as proposed would preclude multiple use management in a substantial portion of the Royal Gorge Field Office. According to the Plan of Development, operations would require "continuous sorties throughout the year", and non-tenant training activities could amount to 1,440 landings per year, per landing zone (POD, p. 5-6). This is in addition to the *minimum* usage by Home Station Units of 16.25 landings per year per landing zone, and the POD states that estimating the maximum usage is infeasible. *Ibid.*

b. National Environmental Policy Act

NEPA, 42 U.S.C. § 4321 *et seq.*, dictates that the BLM take a "hard look" at the environmental consequences of a proposed action and the requisite environmental analysis "must be appropriate to the action in question." *Metcalf v. Daley*, 214 F.3d 1135, 1151 (9th Cir. 2000); *Robertson v. Methow*

Valley Citizens Council, 490 U.S. 332, 348 (1989). In order to take the hard look required by NEPA, BLM is required to assess impacts and effects that include: “ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, **whether direct, indirect, or cumulative.**” 40 C.F.R. § 1508.8. (emphasis added). NEPA defines “cumulative impact” as:

the impact on the environment which results from the incremental impact of the action **when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.** Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

As detailed above, the scale of total potential impacts from implementation of Fort Carson’s full suite of activities proposed in the Plan of Development could lead to severe degradation of other public lands resources in the Royal Gorge Field Office. This proposal therefore requires an environmental impact statement to fully and adequately analyze those impacts and consider appropriate mitigation measures for activities that are allowed to move forward. Additionally, Fort Carson must estimate the maximum usage by Home Station Units to inform a defensible NEPA analysis, or BLM must impose a maximum and evaluate impacts from that usage in the NEPA analysis.

NEPA further requires that BLM consider a range of management alternatives, including assessment of more environmentally protective approaches, and assess opportunities for mitigating impacts. 40 C.F.R. § 1502.14; *Envnt’l Defense Fund., Inc. v. U.S. Army Corps. of Eng’rs*, 492 F.2d 1123, 1135 (5th Cir. 1974); *see also Or. Env’tl. Council v. Kunzman*, 614 F.Supp. 657, 659-660 (D. Or. 1985) (stating that the alternatives that must be considered under NEPA are those that would “avoid or minimize” adverse environmental effects). In addition to evaluating an action and no action alternative, BLM should evaluate multiple alternatives that reduce the number and locations of landing zones for HAMET activities. We further recommend BLM evaluate alternatives to reduce impacts from activities where they do occur, such as timing limitations, phasing zone locations and offsite mitigation.

Importantly, 40 C.F.R. § 1502.15 requires agencies to “describe the environment of the areas to be affected or created by the alternatives under consideration.” Establishment of baseline conditions is a requirement of NEPA. In *Half Moon Bay Fisherman’s Marketing Ass’n v. Carlucci*, 857 F.2d 505, 510 (9th Cir. 1988), the Ninth Circuit states that “without establishing . . . baseline conditions . . . there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA.” The court further held that “[t]he concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process.” We note that BLM is beginning a full revision to the Royal Gorge RMP imminently, a process through which the agency will be updating its inventory of public lands resources and considering management direction for those resources. BLM must ensure the baseline conditions informing the NEPA analysis for HAMET are updated and accurate, which will likely require inventory work that is not yet complete but is underway. BLM should consider deferring approval of HAMET activities until the baseline inventory is complete for the RMP.

c. Instruction Memorandum 2001-030 – Military Activities On and Over the Public Lands

BLM’s website for the HAMET proposal includes IM 2001-030, which BLM describes as a compilation and restatement in a single document of statutory, regulatory and policy guidance that affect the authorization of military activities that may impact public lands managed by BLM. This IM identifies several components that must be included in BLM’s NEPA analysis for the HAMET proposal. First and foremost, we note that the IM explicitly states that “Requests for use of the public lands for military activity are not given any special status” and “The NEPA analysis must address why existing military lands can not accommodate the proposed use.” IM 2001-030(B). This should be explicitly addressed in the NEPA analysis, including considering an alternative in which all or part of the proposed activities are limited to existing military lands. This is especially important given that the cumulative area of proposed activities amounts to a significant proportion of public lands in the Royal Gorge Field Office.

IM 2001-030 also states that decision making documents should evaluate environmental effects and effects on other public land users. IM 2001-030(D). As detailed later in these comments, the proposed activities could significantly impact natural resources and recreation experiences on the public lands. BLM must fully evaluate impacts to the public lands users from authorizing HAMET activities in this valuable area, including recreation visitors and outfitters, as well as other businesses that rely on recreation visitors to this area.

Recommendations: BLM must take a hard look at the potential impacts from the HAMET proposal, complying with FLPMA, NEPA and agency guidance. BLM should complete an environmental impact statement, ensure its inventory of baseline conditions is updated especially in light of the impending RMP revision, evaluate a robust range of alternatives to the proposed action, and eliminate, minimize and mitigate impacts to public lands resources as much as possible where impacts could occur.

II. Wilderness Resources

The HAMET proposal would impact multiple wilderness resources in the Royal Gorge Field Office, including the High Mesa Grass Wilderness Study Area, the Table Mountain proposed wilderness area, and many other inventoried lands with wilderness characteristics on the public lands. Impacts to all of these resources should be eliminated or mitigated to preserve multiple use and balanced management of the public lands.

Wilderness Study Areas

First and foremost, BLM should not authorize HAMET activities in the High Mesa Grass Instant Study Area (or any other wilderness study areas). BLM is required to manage WSAs so as to not impair the suitability of such areas for designation by Congress as wilderness. Therefore, WSAs are correspondingly subject to the same DOD regulation(s) applicable to designated wilderness, and should be excluded from HAMET activities that include repetitive and continuous helicopter landings.

Table Mountain Citizens’ Wilderness Proposal

Secondly, the Table Mountain Citizens’ Wilderness Proposal area should similarly be excluded from HAMET activities. Citizens and wilderness organizations have advocated for the Table Mountain area to be designated as wilderness for the past 12 years. BLM should not authorize activities that would impair its suitability for wilderness designation, or that would degrade the values which make Table Mountain important to public lands visitors seeking wilderness experiences.

We note that BLM previously declined landing zones proposed by Fort Carson within the Wilderness Study Area and Table Mountain wilderness proposal because they “did not meet the casual use criteria” (see casual use letter dated May 1, 2013, attached to these comments). We expect BLM would reach a similar conclusion on these same zones which are now being proposed under the Plan of Development.

In addition to the exceptional wilderness-quality lands identified above which must be excluded from all HAMET activities, a substantial majority of the proposed landing zones would impact inventoried lands with wilderness characteristics in the Royal Gorge Field Office. These lands require analysis and management consideration per BLM Manuals 6310 and 6320, which is best completed through the land use planning process. BLM should therefore defer authorizing HAMET activities in all potential lands with wilderness characteristics until the Royal Gorge RMP revision is complete.

Lands with Wilderness Characteristics

The majority of the HAMET proposed landing zones are within lands with wilderness characteristics inventoried by BLM and Wild Connections. Lands with wilderness characteristics are a resource of the public lands that must be inventoried and considered in NEPA processes. These areas are important for their natural values, such as wildlife habitat and ecological functions, and to public lands visitors seeking the sights and sounds of nature for primitive recreation experiences. Lands with wilderness characteristics would be adversely impacted by HAMET activities.

Section 201 of the Federal Land Policy and Management Act (FLPMA) requires the BLM to maintain on a continuing basis an inventory of all public lands and their resources and other values, including lands with wilderness characteristics. IM 2011-154 and Manuals 6310 and 6320 set forth the agency’s current policy for implementing that requirement. The IM directs BLM to “conduct and maintain inventories regarding the presence or absence of wilderness characteristics, and to consider identified lands with wilderness characteristics in land use plans and when analyzing projects under [NEPA].” Manual 6310 requires BLM to consider whether to update or conduct a wilderness characteristics inventory when a project that may impact wilderness characteristics is undergoing NEPA analysis (Manual 6310 at .06(A)(4)). Manual 6320 requires BLM to ensure that “wilderness characteristics inventories are considered and that, as warranted, lands with wilderness characteristics are protected in a manner consistent with this manual in BLM planning processes” (Manual 6320 at .04(C)(2)).

The Royal Gorge Field Office conducted an initial LWC inventory update in compliance with the new guidance in 2013. The proposed HAMET landing zones overlap with at least two of the areas BLM found to have wilderness characteristics in the updated inventory: Cooper Mountain and Red Canyon. The inventory will be subject to NEPA through the Royal Gorge RMP revision, in which the public will have opportunities to comment on the inventory and BLM will evaluate management alternatives for protecting lands with wilderness characteristics. Until that process occurs, BLM should not authorize activities which would degrade lands with wilderness characteristics and preclude the agency from adopting management decisions to protect those areas.

Moving forward with the HAMET activities as proposed at this time could undermine the upcoming RMP revision by foreclosing management alternatives that might otherwise protect the wilderness and wildlife values of lands with wilderness characteristics in violation of the National Environmental Policy Act, which provides that:

(a) Until an agency issues a record of decision as provided in Sec. 1505.2 (except as provided in paragraph (c) of this section), *no action concerning the proposal shall be taken which would:*

1. Have an adverse environmental impact; or
2. *Limit the choice of reasonable alternatives.*

....

(c) While work on a required program environmental impact statement is in progress and the action is not covered by an existing program statement, agencies shall not undertake in the interim any major Federal action covered by the program which may significantly affect the quality of the human environment unless such action:

1. Is justified independently of the program;
2. Is itself accompanied by an adequate environmental impact statement; and
3. *Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives.*

40 C.F.R. § 1506.1 (emphases added). While the agency has discretion in determining where this standard applies, in this context approving long-term activities that would degrade wilderness resources within these lands will limit the choice of alternatives and prejudice the ultimate decision in the Royal Gorge RMP revision.

Wild Connections has also been completing lands with wilderness characteristics inventory in the Royal Gorge Field Office. BLM Manual 6310 provides for the public to submit information regarding lands with wilderness characteristics and requires BLM to evaluate and respond to that information. The majority of the proposed landing zones are within Wild Connections' lands with wilderness characteristics inventory. Some of these zones were previously declined for use by BLM in its May 2013 casual use letter, and those zones are presumably still not appropriate for HAMET activities. **For all proposed landing zones that overlap with Wild Connections' LWC inventory, BLM must analyze impacts to wilderness characteristics from the proposed action and any alternative actions and consider measures to eliminate, minimize and mitigate those impacts, including by declining landing zones within those areas, deferring decisions on landing zones within those areas until management is determined through the upcoming RMP, and offsetting impacts by protectively managing other LWCs in the Royal Gorge Field Office.**

We furthermore note that the Plan of Development states that Fort Carson would "prefer to avoid areas of concern where conflicts with resource values or other public land users are identified or foreseeable," including sensitive or protected resources on the public lands (HAMET Plan of Development, 9/3/2013, p. 10-11). Wilderness resources on the public lands are sensitive areas in which there are identified conflicts with HAMET activities, and so those areas should be avoided all together, including Wilderness Study Areas, proposed wilderness, and lands with wilderness characteristics.

Recommendations: BLM should not authorize HAMET activities in any lands with wilderness resources, as these areas provide important natural and recreation values on the public lands that are incompatible with the proposed action. BLM must respond to citizens' information regarding lands with wilderness

characteristics and evaluate management alternatives for protecting lands with wilderness characteristics prior to authorizing activities that may degrade those characteristics, including HAMET. That is best accomplished through the land use planning process; therefore, BLM should defer authorizing HAMET activities in all potential lands with wilderness characteristics until the RMP revision is complete.

III. Arkansas Canyonlands Area of Critical Environmental Concern

Several of the proposed HAMET landing zones are within the Arkansas Canyonlands ACEC. It appears that many or all of these proposed landing zones were previously declined by BLM in its May 2013 casual use letter, presumably because HAMET activities would be an inappropriate use of the ACEC. That conflict is still present, and those same zones remain inappropriate and should be excluded from the Plan of Development.

The Arkansas Canyonlands ACEC is managed to protect scenic, historic, and cultural values, including endangered peregrine falcons, important raptor habitat, bighorn sheep, special status plants and fisheries (1996 Royal Gorge Land Use Plan, p. K-10). The ACEC encompasses an exceptional scenic canyon that is popular for river recreation, offering scenic vistas, two resident bighorn sheep herds, wintering bald eagles, and numerous other sites of historic and geologic interest. BLM manages the ACEC with a no surface occupancy stipulation to protect those values, demonstrating their fragile nature and incompatibility with HAMET activities.

The Plan of Development states that Fort Carson would “prefer to avoid areas of concern where conflicts with resource values or other public land users are identified or foreseeable,” including sensitive plant and wildlife habitat, high use recreation areas, and other sensitive or protected resources on the public lands (HAMET Plan of Development, 9/3/2013, p. 10-11). The Arkansas Canyonlands ACEC is a protected area on the public lands harboring many sensitive resources, and so it should be completely excluded from any HAMET activities.

Recommendations: No HAMET activities should be permitted in the Arkansas Canyonlands ACEC, or any other ACECs, as these areas have relevant and important values requiring protective management.

IV. Recreation Conflicts

A substantial amount of the proposed HAMET landing zones are within the Gold Belt Recreation Area. The Gold Belt area is one of the Royal Gorge Field Office’s crown jewels and is a haven for scenic touring and recreation. The Gold Belt Recreation Area includes the famous Gold Belt Tour Scenic and Historic Byway, which features steep winding canyons, rolling hills and historic artifacts. The Gold Belt Recreation Area also includes many other sought after recreation opportunities for hikers, mountain bikers, equestrians and climbers, and is renowned for the Shelf Road rock climbing area. The Garden Park Fossil Area, Florissant Fossil Beds National Monument and Indian Springs Trace Fossil Site are other popular destinations in this area.

According to the Royal Gorge RMP,

The Gold Belt Scenic Byway was added to the BLM National Backcountry Byway system because of the scenic qualities, rich history, and over 350,000 annual pleasure drivers. Results of a 1991 recreation survey conducted along the scenic byway indicated that the scenic quality of the area

was the number one attraction for visitors to the area. Steep and rugged terrain of Eight and Fourmile Canyons along with the wide expanses and rolling hillsides of the High Park area attracts visitors from around the world. The Gold Belt SRMA includes one wilderness study area (Beaver Creek) recommended by BLM for wilderness designation. The SRMA has VRM Class II rating areas in the foreground and views of the scenic canyons/vista adjacent to the byway roads where the majority of activity occurs.

Royal Gorge Draft RMP, p. 2-82. The scenic and recreation values of this area would be impacted by HAMET activities, especially on the scale proposed in the Plan of Development. BLM should eliminate these impacts where possible, and also consider ways to minimize impacts such as by restricting HAMET activities to times of low tourism.

BLM manages the Gold Belt Recreation Area to maintain and/or enhance the natural setting, such as wildlife habitat, visual resources and recreation sites. This includes limitations on motorized vehicle use, rights-of-way, mineral leasing and development and livestock grazing. These management actions demonstrate the importance of protecting recreation experiences in this area from uses that would degrade those experiences, and HAMET activities on the scale proposed in the Plan of Development would severely degrade recreation opportunities in the Gold Belt Recreation Area.

The Plan of Development states that Fort Carson would “prefer to avoid areas of concern where conflicts with resource values or other public land users are identified or foreseeable,” including high use recreation areas (HAMET Plan of Development, 9/3/2013, p. 10-11). The Gold Belt Recreation Area is a sensitive and protected area on the public lands with high recreation use, and so impacts from HAMET activities should be excluded, avoided or mitigated. If use of the area can not be avoided all together, BLM should evaluate alternatives that consider significant measures to mitigate impacts, such as phasing activities and timing limitations.

We also note that many BLM lands within the Gold Belt Recreation Area have been found by BLM and Wild Connections to possess wilderness characteristics. Lands with wilderness characteristics provide excellent backcountry recreation opportunities, and protecting those areas has the added benefit of protecting sought-after primitive recreation experiences. Likewise, authorizing HAMET activities in these areas as proposed would degrade multiple values of the public lands because many of those values coexist in these areas.

Recommendations: BLM must take a hard look at impacts on recreation from the proposed HAMET activities in this NEPA analysis and evaluate alternatives to eliminate, minimize and mitigate those impacts. The Gold Belt Recreation Area is a highly valuable recreation destination in the Royal Gorge Field Office, and has statewide and national importance as well, and HAMET activities should not be authorized that would cause major conflicts with recreation experiences.

V. Soundscape Analysis

As part of the NEPA analysis for the HAMET proposal, we encourage BLM to evaluate noise impacts on recreation and wildlife, and consider alternatives to minimize or mitigate those impacts. Like viewsheds and air quality, sound is one of the resources on the public lands that is affected by agency-authorized uses and can impact other resources as well, such as recreation and wildlife. BLM has a statutory obligation to manage the public lands “in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values;

that, where appropriate, will preserve and protect certain public lands in their natural condition.” 43 U.S.C. § 102(8). To fulfill this mandate, it is important for the BLM to consider natural soundscapes in order to give meaningful effect to this provision, especially on those lands which are to be managed in their “natural condition,” including wilderness study areas and lands with wilderness characteristics.

As a part of its multiple-use mandate, BLM can and should provide opportunities for quiet recreation on the public lands. See 43 U.S.C. § 102(7). As a result, BLM must also consider activities that interfere with the soundscape associated with quiet recreation opportunities, such as the proposed HAMET activities. Research shows that for many people, especially quiet recreationists, the primary reason for visiting primitive landscapes is to attain a sense of solitude and tranquility, which are interrupted by non-natural noises. A study performed by psychologists at Colorado State University (CSU) found that acoustic stressors impact visual landscape quality.¹ In other words, non-natural noise actually affects the perceived naturalness of a landscape. Therefore, in order to preserve the naturalness of an area, BLM must preserve the natural soundscape.

Furthermore, the authors of the CSU study note that “tranquility” and “solitude” are explicitly addressed in the Wilderness Act as values that must be preserved by land management agencies. BLM guidance directs the preservation of “naturalness” in Wilderness Study Areas, Visual Resource Management I zones, and other areas managed to protect wilderness qualities. All of these values are negatively impacted when the natural soundscape is impacted; therefore, BLM must retain the natural soundscape in wilderness-quality lands and primitive recreation areas. This is important because the U.S. Geological Survey has found that dissatisfaction with recreational opportunities can “diminish public support for land-management programs.”²

BLM’s obligation to preserve natural soundscapes is further described in Executive Order 11644 (1972), as amended by Exec. Order 11989 (1977), which directs the BLM to locate areas and trails so as to Minimize conflicts between off-road vehicle use and other existing or proposed recreation uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors. BLM regulations at 43 C.F.R. § 8342.1 reiterate the directives of the executive order.

In order to effectively and appropriately achieve this goal, the Colorado BLM issued “A Recreation and Visitor Services Strategy” (“Recreation Strategy”) to help field offices provide quality recreation experiences for all users. The Recreation Strategy recognizes that BLM’s obligation to provide recreation areas for many user types requires designation of quiet recreation zones. It defines “quiet recreation” as “Outdoor recreation enthusiasts such as hikers, skiers, mountain bikers, equestrians, bird watchers, hunters and anglers *who seek the opportunity to enjoy natural soundscapes*” (p. 17) (emphasis added).

¹ Britton L. Mace et al., *Aesthetic, Affective, and Cognitive Effects of Noise on Natural Landscape Assessment*, *Society & Natural Resources*, 12: 225-242, 1999.

² Ouren, D.S., C. Haas, C.P. Melcher, S.C. Stewart, P.D. Ponds, N.R. Sexton, L. Burris, T. Fancher and Z.H. Bowen. 2007. Environmental effects of off-highway vehicles on Bureau of Land Management lands: a literature synthesis, annotated bibliographies, extensive bibliographies, and internet resources. U.S. Geological Survey, Open-File Report 2007-1353, Reston, VA. Available at: <http://www.fort.usgs.gov/products/publications/22021/22021.pdf>.

Additionally, courts have upheld the responsibility of federal land management agencies to evaluate noise impacts on the natural soundscape. *Izaak Walton v. Kimbell*, 516 F. Supp. 2d 982, 985, 995-96 (D. Minn. 2007) (EA prepared by U.S. Forest Service for plan to construct snowmobile trail adjacent to Boundary Waters Canoe Area Wilderness failed to properly analyze noise impacts from snowmobile use, as required by NEPA; EA provided no quantitative evidence of analysis of decibel levels to be projected by snowmobile use of the trail into adjoining wilderness).

By way of example, the Northwest Colorado Greater Sage-grouse Draft EIS includes soundscapes as a separate resource in its affected environment and environmental consequences analyses. The Draft EIS modeled ambient background noises at specific points to determine the expected levels of sound dissipation during winter and summer months as tied to vegetation and topography. The Draft EIS assessed factors influencing the habitat soundscape, including aviation, recreation and off-road vehicle use, transportation routes, energy development, and urban areas (Draft EIS, pp. 397-401). The Draft EIS finds that any change from ambient noise levels would be an adverse impact on soundscapes and further commits the agencies to further analyze impacts on soundscapes at the project implementation level (Draft EIS, pp. 831-833). The Vermilion Cliffs National Monument Approved Resource Management Plan³ also identifies soundscapes as a separate and specific resource addressed in the plan (Approved RMP, p. 2-50). The plan includes a desired future condition that “Natural quiet and natural sounds will be preserved or restored, where practicable.” *Ibid.* The Royal Gorge Field Office should similarly model noise impacts on recreation and wildlife from the proposed HAMET activities and seek to minimize those impacts.

Recommendations: BLM should complete soundscape analysis as part of this NEPA process, giving special attention to impacts on recreation and wildlife, and evaluate alternatives to eliminate, minimize and mitigate those impacts.

Thank you for considering these comments. Please keep us apprised of further developments regarding the HAMET proposal.

Sincerely,

Juli Slivka, Planning Specialist
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³ Available at http://www.blm.gov/pgdata/etc/medialib/blm/az/pdfs/nepa/library/resource_management/vermilion_ROD.Par.1.6341.File.dat/Ch_2.pdf



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET scoping comments

Juli Slivka <juli_slivka@tws.org>

Tue, Dec 23, 2014 at 2:07 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

Attached please find scoping comments from The Wilderness Society and Conservation Colorado regarding the HAMET proposal in the Royal Gorge Field Office.

Thank you,

Juli Slivka

Planning Specialist


The Wilderness Society

BLM Action Center

(303) 650-1179

Facebook: [facebook.com/TheWildernessSociety](https://www.facebook.com/TheWildernessSociety)

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 HAMET Comments 12192014 TWS COCO.pdf
409K

NOT FOR SALE

In 2005, the entire agricultural community in Southeast Colorado faced losing their ranches to an aggressive land grab by the U.S. Army. By combining biological evidence, cultural heritage, intense document research, the political process, and, when necessary, legal action, these ranchers smartly, legally, and collectively saved their land. —**Bob Welch**

"For waging war you need guidance, and for victory many advisers." Proverbs 24:6

SOME 30 YEARS LATER, locals still refer to it as "The Taking."

In 1980, the Fort Carson Army Installation Base, near Colorado Springs, Colo., began the process of acquiring 238,000 acres of ranchland in Southeast Colorado to create the Pinon Canyon Maneuver Site. It was an ambush. The landowners, frightened and confused, responded in a variety of ways but were ultimately pushed out.

Only half of the land was sold to the Army by willing sellers and some of those sales came from realtors who caught wind of the Army's plans and subsequently engineered deals. Any unwilling seller whose ranch lay between two willing sellers was doomed.

Well-versed in battle tactics, the Army divided the ranchers to conquer them. Some felt as though it was their patriotic duty to sell to the Army. Others pleaded with Congress. Others fought until the bitter end in the courts, losing the entire value of their ranches in legal fees. Still others steadfastly refused to leave their property until U.S. Marshalls forcibly removed them.

Charles Gyrman is one rancher who received a visit from a U.S. Marshall who told him to remove his cows. The Army acquired a part of his ranch, and in the process, he suffered a stroke that left him on his

back for the rest of his life. Today, his son, Kennie, continues to ranch on what was left.

Once it was over, in 1983, The Taking became one of the largest condemnations of private property in U.S. history, but it pales in comparison to what came next.

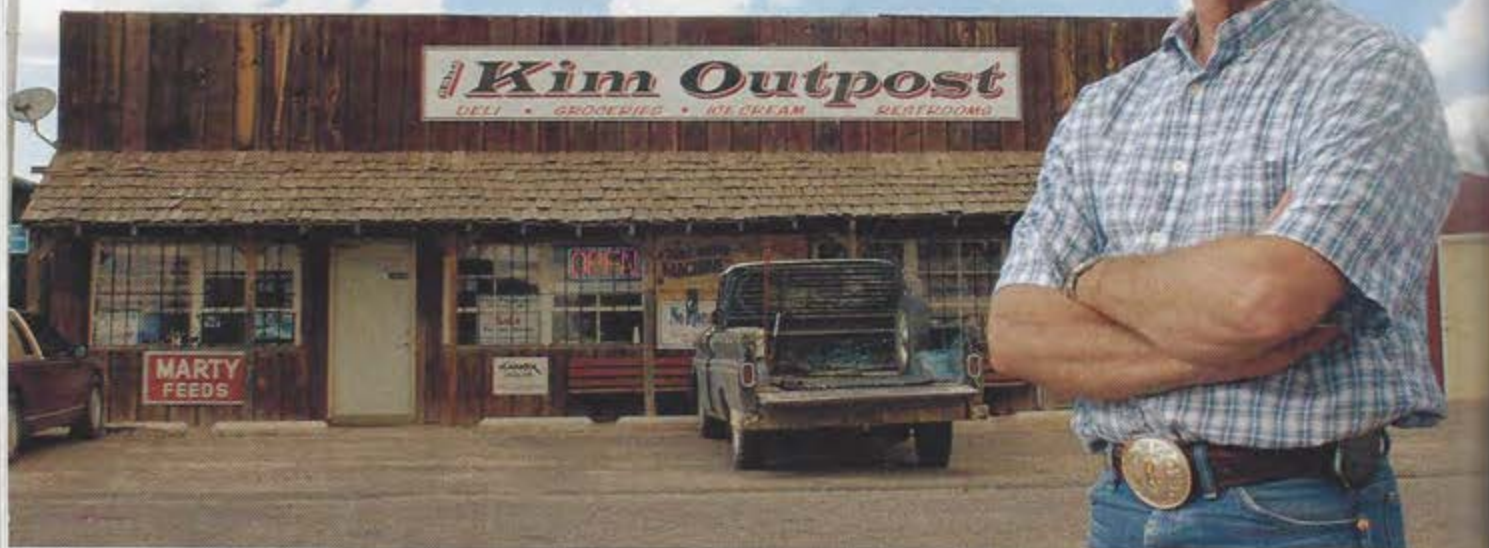
In 2005, a map leaked to the *La Junta Tribune-Democrat* showing plans for a proposed 20-year expansion to overtake nearly 5 million acres of land in Southeast Colorado. Later research uncovered the actual planned expansion was closer to 7 million acres, just bigger than the entire state of Maryland. Though the Department of Defense limits military bases from purchasing land in excess to 1,000 acres or \$1 million, the ranchers soon discovered that Fort Carson had also already applied for a waiver of that regulation.

Roughly 10 percent of the state's acreage—bound by Interstate 25 to the west, New Mexico and Oklahoma to the south, Kansas to the east, and the Arkansas River to the north—was in the Army's crosshairs. More than 17,000 people would be displaced.

This time, though, the Army lost the element of surprise. The ranchers and their allies would fight. They formed the Pinon Canyon Expansion Opposition Coalition, and two offshoots, Grasslands Trust and Not One More Acre!, and began drawing up a battle plan.



PHOTO: KATHLEEN GILBERT



(CLOCKWISE FROM TOP) RANCHER LON ROBERTSON, OWNER OF THE KIM OUTPOST, SERVED AS PRESIDENT OF THE PINON CANYON EXPANSION OPPOSITION COALITION. ACROSS THE REGION, RANCHERS POSTED NOT 4 SALE SIGNS ON THEIR PROPERTY. AN ENHANCED VERSION OF THE LEAKED MAP, SHOWING THE PROPOSED EXPANSION AREA.

[WHY DID THEY WANT IT?] NATIONALLY, THE DEPARTMENT OF DEFENSE controls some 25 million acres. So the proposed massive land grab begged the question, Why does the Army need so much land?

In response to this question, the Army informed the public that it needed the land to properly train troops for brigade-scale combat in semi-arid regions similar to that of Iraq and Afghanistan. Further research, however, reveals frustrating and

typically bureaucratic reasons for the proposed expansion.

First, U.S. Army bases are subject to a process called Defense Base Realignment and Closure, wherein bases are routinely closed. Even Fort Carson, a premier Army base, suffers from the fear of closure and actively works to make itself indispensable to the Army's mission.

Sharing in that fear—and prodding for growth—is the city of Colorado Springs and El Paso County. The city and county's economic vitality is largely dependent upon military presence, and the entities work together to promote the area's growth.

More troops means more growth in the area and a smaller chance that the base will close, but there must be a reason

PHOTO: SAUL LOEB/GETTY IMAGES

for more troops—hence, a brigade-level training ground.

"An active and vibrant military presence is good for their economy," explains Steve Wooten, a rancher who shares about seven miles of fence with the current PCMS near Kim, Colo., and is vice president of the PCEOC. "If Colorado Springs and El Paso County want to have a combination military and private economic base, that's fine. Just not at the expense of our private property rights."

Finally, there's no top-down land use planning in the Department of Defense. Rather, it's a bottom-up process wherein each base proposes and predicts its land use needs for the future. So, for example, while the 800,000-acre Dugway Proving Ground facility in Utah might be suitable for brigade-scale desert training, there's no authority telling Fort Carson that a suitable training ground already exists.

[DEEP ROOTS]

UNLIKE MUCH OF AMERICA'S POPULATION, the kids in Southeast Colorado are often raised in the same house their great-grandparents built. The people here are not as transient as the rest of our culture. History and place are dominant factors in their sense of self.

Lon Robertson, president of the PCEOC, rancher, and owner of the Kim Outpost store, is named for his grandfather, who came in a covered wagon from Texas in 1916 to settle in Southeast Colorado.

Steve Wooten's great-grandfather migrated to the United States in 1860 from Ireland. He built a ranching empire in Southeast Colorado and Northeast New Mexico that includes the ranch where Wooten and his wife, Joy, now live, purchased in 1929.

"Between my wife and I, me on the Doherty side and Joy on the Jackson side, there were 11 families in that expansion area," Wooten says. "With that large-scale land grab, we were going to see our family broken up and scattered to the wind. There's no way to pick all that family heritage up and move it to Arizona and keep it intact."

From Trinidad to Springfield, the stories are similar. These folks are children and grandchildren of those who survived

the Dust Bowl and the Great Depression. Descendants can point to Public Works Administration projects their ancestors helped build that are still in use today. In a word, they're tough.

"We aren't still here after multiple generations because we give up," Robertson says. "Because of the nature of life here, we're a little more stubborn. We don't go along just to go along. It better make sense or we won't survive."

Grady Grissom, another PCEOC board member and rancher from closer to Fowler, puts it more bluntly:

"When it all started, I was told by a lot of people—influential people who had seen the 1980 creation of Pinon Canyon—that I was wasting my time. But I didn't think I could ever forgive myself if I got chased off that land without fighting. It's the mentality of the rancher—you may whip me, but I will hit you before it's over."

[CHANGING PERCEPTIONS]

WHEN THE MAP WAS LEAKED and the dispute started, filmmaker Jim Bigham produced a 30-minute documentary.

RANCHERS IN SOUTHEAST COLORADO STILL MAINTAIN RANCHES (AND FENCE) THAT THEIR GRANDPARENTS AND GREAT-GRANDPARENTS BUILT.





(CLOCKWISE FROM TOP) CATTLE IN THE TWILIGHT OF A SOUTHEASTERN COLORADO EVENING. NATIVE CULTURE REMNANTS, LIKE THESE PETROGLYPHS, DOT THE RANCHES OF SOUTHEASTERN COLORADO. RANCHER KENNIE GYURMAN AND HIS LATE WIFE, MARIA, ON THEIR RANCH.



(OPPOSITE PAGE) GRADY GRISSOM, RANCHER AND PCEOC BOARD MEMBER, ADDRESSES THE CROWD AT A RALLY AT THE KIM HIGH SCHOOL GYMNASIUM.



In it, he interviewed Mike Kazmierski, who, at the time, was the CEO of the Colorado Springs Regional Economic Development Corporation and former Garrison Commander of Fort Carson.

"There's no question that there are willing sellers," Kazmierski says in the film. "If it's anything like the first Pinon Canyon, many of these farmers are barely making ends meet. It's a very dry part of the state. It's over-ranched. In some cases, that part of the state is just getting by."

That sentiment became the perception and argument for expansion. However, within that one statement, the PCEOC found its first two points of rebuttal to

begin their counterattack. The first, that there were willing sellers, and the second, that the area was over-ranched or abused.

Their response in refuting the willing sellers claim was simple. The PCEOC created a map, and starting in concentric circles around the PCMS, they contacted landowners to find out if they were indeed willing sellers, promising anonymity. Not one person came forward publicly as a willing seller.

Next, and perhaps most significantly, PCEOC commissioned an expansive biological study to address the claim that the ranching community had abused the land. Knowing they had to get ahead

PHOTO: KAY BURKH/STRAW PHOTOGRAPHY; PHOTOGYPHS: DEBBIE BOK/GETTY IMAGES

PHOTO: NATE BERG/GETTY IMAGES

of the Army's own studies, they worked with the Colorado Natural Heritage Program—with funding from Great Outdoors Colorado and the Colorado Cattlemen's Ag Trust—to study over 1 million acres of privately held ranchland.

The study kicked off in 2006, and before the fight was over, everyone could see its effect.

"The biological study was huge," Grissom says. "In the 1980s, the Army made the argument that the land was used up; it's been dry and the people are looking for a way out."

Until that point, the only grassland studies in the state were on Comanche

"An active and vibrant military presence is good for [the] economy.... Just not at the expense of our private property rights."

and Pawnee National Grasslands because biologists couldn't get large-scale access to private property.

"Steve had the foresight and the huevos to organize that biological study," Grissom adds. "For 50 years the beef industry has said they're the environmental stewards of the land, but nobody has had the bravery to bring biologists on to their land and prove it. In 1 million acres, the study encompasses all kinds of management styles and the overall verdict was this land is healthy. Those biologists were dumfounded, but Steve had the belief in ranching."

Ranchers, Grissom pointed out, operate on such a thin financial margin that any abuse of the land leads to an almost immediate economic message in the form of smaller weaning weights and poor breed ups. Ranchers anywhere, but particularly in a fragile ecosystem like Southeastern Colorado, cannot abuse the land and stay in business. In fact, Grissom argues, ranching is inherently sustainable for that very fact. Track tanks, on the other hand, are much more difficult—if not impossible—for the short grass prairie to recover from.

The biological study then led to a similar archeological study in 2007, conduct-

ed by Colorado Preservation Inc.

"The Army said they're the better stewards of natural and historical archeological assets and we said, 'We beg to differ,'" Wooten explains. "And we went to get the study to say so."

Chronicling human activity from the Native populations through Hispanic and Anglo settlers, the study brought to light the immense amount of anthropological history in the area. This presented a problem for the Army, in that they would have to preserve any archeological site on land they own under section 106 of the Historical Archeological Act.

"We felt like the area is so rich in cultural history that the Army would see how limited they would be by its mere existence and not want to expand," Wooten said.

[GRASSROOTS EFFORTS]

WHILE THESE GROUNDBREAKING studies were going on behind the scenes, PCEOC was working hard at a grassroots level to curry support and make their argument.

"One of the key elements was the realization that we were going to be judged so carefully by the military, the media, by Congress, by the Senate, and everybody we asked to help," says Wooten. "So we're going to have to be perfectly on target. Our mission statement was calm, collected, and extremely accurate."

"The cowboy culture was put to the test right there and we all bought into it," he continued. "We're going to say it like it is and let it be weighed by its own merits."

Other smaller, but no-less-significant



(TOP) RANCHER STEVE WOOTEN WITH HIS WIFE, JOY (LEFT), AND HIS MOTHER, BETTY, ON THE BEATTY CANYON RANCH. DOUG HOLDREAD, ARTIST AND PROFESSOR. (OPPOSITE) RANCHERS AT AN ANNUAL SPRING BRANDING.

strategies the PCEOC employed included countless media interviews, billboard purchases along Interstate 25, selling bumper stickers, and “Not 4 Sale” signs, which they posted on the highway frontages of their ranches. Funding came from local ranchers donating a calf every year, sale barns hosting benefit auctions, in-kind donations, and grants from foundations looking to support the cause.

The PCEOC also made a point to never hold meetings with the Army on an individual basis. They stressed that all meetings with the Army should be public. This tactic allowed the ranchers to maintain a united front and keep all statements on the public record.

At one meeting, the Army handed out a poorly produced map—Wooten described it as if it came out of a printer that was out of ink. No one could tell what land the Army was focusing on now. Kenie Gyrman, whose father suffered the debilitating stroke during *The Taking*, lost his composure. Shaking and near tears, he stood and confronted the Army officials, demanding they point out if his ranch was on this map. They couldn't.

Passion like Kenie's led to fighting on multiple fronts. Fellow board member Doug Holdread, the now-retired head of the art department at Trinidad State Junior College, dove into the military documents to uncover plans, look for missteps, and find ways to hold the Army accountable. As the Army would try to deny this action or that plan, PCEOC would confront and foil them with the Army's own words and documentation.

“The documents were all redacted with a black marker,” Holdread explained. “There were bits of letters sticking out, so it was like a puzzle to figure out what words had been redacted. Some of that turned out to be significant. Like figuring out how many digits there were in certain numbers so we could get an idea of how big their plans were.”

Meanwhile, PCEOC got out in front of the public. They started with an expansive letter-writing campaign to various local officials. They gave presentations to



school boards, civic clubs, and even to the nuns who went on to break into the nuclear weapons complex in Tennessee.

“The strategy [was] to get resolutions from any entity that will give you resolutions—school boards, chambers of commerce, county commissioners—and build that platform in each town.

“Pretty soon, you've got the county commissioners saying they need to be on the right side of this,” Grissom explains.

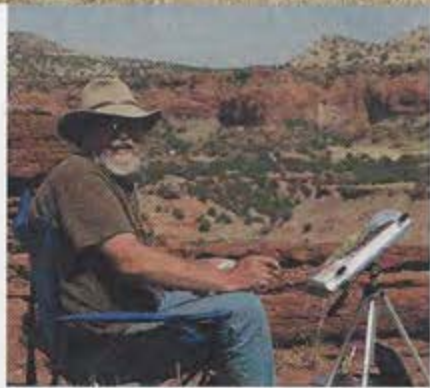
“Any bureaucracy or entity that we were fighting against, they didn't have the commitment for the after-hours work that we did.”

“Then you go to the surrounding counties the same way and it happens quicker.”

Before long, the land battle reached the state level. That's when local FFA chapters loaded up for trips to the capitol in Denver to testify before the state representatives. Completely by design, this became a regional issue—not a partisan one—and representatives from both sides of the aisle supported the PCEOC.

Two Colorado state bills, 1069 and 1317, were passed, adding some layers of protection to the ranchers.

The first bill withdrew the consent of the state of Colorado to the federal government to purchase, or through eminent domain, obtain land specifically for the expansion of PCMS. The other bill prohibits the state of Colorado from selling any state land for the purpose of PCMS expansion.



At the national level in 2008, Sen. John Salazar (D) and Rep. Marilyn Musgrave (R)—armed with biological and historical studies and nearly unanimous local support—co-sponsored an amendment to the National Defense Authorization Act that would withhold any funding for Pinon Canyon expansion on a year-to-year basis.

“That's how we put them at a standstill,” Wooten says. “They got an overwhelming Congressional declaration to withhold funds and then a win—barely—in the Senate. We stopped the expansion by withholding funds. It's pretty hard for Washington to ignore state-level bipartisan support for an issue.”

Not One More Acre! took the lead on the legal front. Led by Jean Aguerre, they attacked in the courts. Their first move was a Freedom of Information Act request that exposed much of the Army's plans they had previously tried to deny.

Next, N1MA! challenged that the Army's usage of its existing site was in violation of the Army's original environmental impact study. U.S. Senior District Judge Richard Matsch ruled that the original EIS was flawed and inadequate and then or-

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dered the Army to go back and re-assess it. "That was a phenomenal move to help shut down expansion," Wooten says. "They could not go forward with expansion because they had a flawed EIS. They kept lots of pressure on them from a legal standpoint."

The combined elements of the environmental and cultural studies, the state and national law passages, as well as NIMA's legal action had the Army on its heels. There were no willing sellers and the Army's own actions—from wiggling through bureaucratic loopholes in expansion efforts to the actual damage being done to the natural and cultural assets on the current Pinon Canyon Maneuver Site—were publicly exposed for being conducted on shaky ground if not outright illegal.

In 2011, Army Secretary John McHugh gave Colorado Sens. Mark Udall and Michael Bennet a letter assuring ranchers that expansion of PCMS was not in the Army's five-year plan.

In 2013, the Army withdrew its expansion waiver—the one that Salazar and Musgrave's bill withheld funds for—and Udall and Rep. Cory Gardner put an amendment in the 2014 Defense Authorization Act stating that PCMS can only be expanded in the future by an explicit vote of Congress.

So many people fought for the resistance effort on so many fronts that to comprehend it all is mind-boggling. Most of what the ranchers did, they did in a flurry of activity over a two-year pe-

riod. From the commissioned studies, to the grassroots efforts, to the countless meetings, to the media relations, to local and statewide fundraising, to political resolutions, to legal action, many of these ranchers put their lives on hold to save their livelihoods.

"A lot of people donated a lot of hours," Robertson said. "Any bureaucracy or entity that we were fighting against, they didn't have the commitment for the after-hours work that we did. Being steadfast and focused were some of the things that brought us to this point."

[REMAINING VIGILANT]

THE NEW STATUS gives the ranchers some comfort, but they've learned to not rely on the government's assurances. While a depressed economy and severe drought have bubbled to the top of their concerns in recent years and the "Not 4 Sale" signs are faded and peeling, they are certain to remain vigilant should the Army's priorities change—which is a distinct possibility with every new administration.

Of course, it won't be hard to forget the threat. The sign on Highway 350 showing the entrance to the PCMS with its tanks looming large is a constant reminder, as are the folks who lost their ranches in the 1980s, many of who still work in the surrounding communities.

"Out of the darkness of all the evictions and losses, it turned out to be an asset to us," Wooten said. "We learned from what took them down and we should never forget and honor those people who gave up

what they gave up."

That statement, not by accident, sounds an awful lot like how Americans pay homage to their military servicemen and women.

"The Army tried to play us off as unpatriotic and not wanting to support training of the troops," Wooten says. "We came back and said, 'Let's get one thing straight, we support the men and women in Iraq and Afghanistan and we're all about training for the troops. What we're not about is the acquisition of private property without just cause. You, the Pentagon, and the Army—not the troops—have not made a justifiable case that the people of Colorado need to sacrifice 10 percent of their state for the military. If you can justifiably prove that lives will be spared, these patriots will walk away from their ranches.'"

Despite the legal wrangling and various tactics employed by both sides, the argument came down to something that simple: in the United States of America, you'd better have an undeniably justified reason to take private property. And while the actions the ranchers took to defend that right weren't always simple, the resolve of people committed to an ideal is as effective now as it was when the country was founded.

"Be involved in our political process," Grissom advises. "Before this, voting was the most involved I ever was. Now I care. I've learned to become a citizen. Being on that board was one of the best experiences of my life. Ultimately, our political process worked ... exactly the way it should work in a representative government."

Not remarkably, other groups in the state and across the country are looking at what the ranchers and other Southeastern Coloradoans accomplished. They're calling it the Pinon Canyon Model, and holding it up as an effective way to stand up to the federal government.

Thomas Jefferson once said that the tree of liberty must be refreshed from time to time with the blood of patriots and tyrants. Maybe he's right. But maybe, if we want to see change, we all just need to be a little more involved in the political processes in our own backyards. Maybe, like Grissom said, we need to become citizens.





HAMET

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To Whom It May Concern:

I live in and own property in Lakemoor West Subdivision in Teller County. I am a patriot, love my country, but I am not naive and not Carson is doing. I do not approve or want a contract between BLM and Fort Carson that allows them to open up the BLM above Lakemoor Subdivision for daily and night time helicopter flights or any other military equipment usage. The "casual use" of this area should also include Zones 701, 702, 703, 704, 705 and 706 are in populated areas and important for wildlife and should not be used. Can you imagine the pollution and damage to forest, land and animals if they bring in helicopters and other equipment day and night with an extremely irregular flight schedule at all times. As they have stated in reports, there is no flight plan, they can fly anywhere anytime in any direction! The flights from one landing zone to another in a different area. This brings up the question of refueling. They certainly will not be going back to base to refuel as fuel was an issue the Forest Service had, from reading one of the articles. Everyone needs to understand this is not just a simple problem for a short time. It is an all out assault on gaining access to public lands for military use for at least TEN YEARS.

There has been more and more information brought to light regarding this proposal, some of which were hidden in reports that are not understood unless someone started digging.

Fort Carson has access to thousands of acres that are closer to Fort Carson and have the same altitude terrain that provides the air space needed for training the pilots that they are bringing in from different bases out of the State. This means hundreds of pilots and hundreds of aircraft. Pinion Canon is military owned and has canyons and terrain for training purposes.

Huge Chinook helicopters have been flying 100 to 200 feet over my home. Helicopters have also been flying through the valley late at night. If the proposal is approved they will be landing and taking off from Landing Zones 704 and 703 which are 1,000 to 2,000 feet behind our home. The noise and vibrations are extremely loud and quite deafening, affecting everything around. This affects the peace (which we live for), the wildlife (which we love), the area livestock and deflates our property values. At this time the training is apparently called "casual use" it includes day and night use and has been ongoing for several years. What will happen will not be casual use. Flights will be coming at all times of the day and at all times of the night.

The contract between BLM and Fort Carson will be for at least ten (10) years and possibly more, with day and night flights into the valley on both sides of the Lakemoor West valley. The Army, according to maps and articles, has many other training sites available where the noise and land damage would not be as greatly impacted, although I am sure this type of use creates problems and damage when training is dangerous and should not be used in areas where an accident can destroy property and lives. Do we as United States care as much as other countries? We have empathy to our military troops and the countries we are helping, but are we to allow our property to be degraded and devalued? The Forest Service has closed down Army landing zones due to fire danger, accidents and impact on wildlife. They have apparently had issues and problems with the military using the forest and surrounding areas. Fort Carson is wanting a contract with the BLM and these are the same issues we will be facing if this is approved. (See articles [Independent; Army looks for other options as Forest Service scales back helicopter zones](#) & [Army seeks chopper flights out east](#))

Do I want the next ten (10) years or more to be spent with an Army site in my backyard? NO! If they obtain a contract changes will eventually and the landing zones will be used however the military want, no matter what they are promising at this time.

This is a wonderful, beautiful place to live. This area of the BLM is used by many for hiking, fishing, horseback riding, and hunting. The land was supposedly to be used for, the people and the wildlife, not for military installations. There was a question as to how does that affect those people that want to continue with the recreational activities such as hiking, etc. Will this area be totally closed off to the public at all times day and night? The access to the land certainly could not continue as normal with military activity on a continual basis. The possibility of accidents, collisions, fires, etc. This is where the wildlife live. They live on the mesa above and in the surrounding forest.

not impact the wildlife and people living in this area?

Fremont County was given an open discussion meeting to be informed, although they were not allowed to ask questions. (See http://www.themountainmail.com/free_content/article_0896e14a-4f05-11e4-922c-001a4bcf6878.html) What is that all about? This h County. Teller County and Park County were not even given this option, that we know of, although both of these counties and their seriously impacted by flight routes, noise and pollution. There were several articles in small local papers that if you missed you hac happening, and information was very light. This is not an ongoing "casual use" option, it is a TEN YEAR CONTRACT which opens n surrounding BLM land to daily and nightly use for dangerous untrained high altitude helicopter pilot training and, I suspect, whatever military usage they will deem necessary in the oncoming years, and trust me they will deem expansion to be necessary. This include usage and equipment refueling. Once this is open to military, we as private citizens do not have a lot of options.

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Please see below the google earth map showing locations of each house in Lakemoor West subdivision and the proximity of the Lan 706.



HAMET

Fort Carson has been expanding and creating a Combat Aviation Brigade that has contracted bringing in out-of-state combat aviation brigades from all branches of the military; to include pilot and helicopters from the Army, Marines, Air Force and Navy pilots.

1. THE HAMET PROPOSAL SHOULD BE CANCELLED WITH NO CASUAL USE AGREEMENT REINSTATEMENT. I find the HAMET Proposal and the past Casual Use Contract to train pilots untrained in high altitude flying dangerous and extremely unethical. The irresponsibility shown by tenant and non-tenant helicopter pilots towards the residents of Teller, Park and Fremont Counties has indicated their indifference to the possible destruction of homes, public and private lands, forest, wildlife, livestock and extreme danger of wildfire. This seems to be more about Army expansion, politics and power than about training. Alternative location suggestions and the use of simulators were directed to the Fort Carson representative. Simulators are available in Texas and Colorado, but we were told this was not an option. A reason was not given.
2. Fort Carson's mapping of MTAs and LZs in Teller, Park and Fremont Counties were inaccurate and questionable.
 - a. MTAs encompass highly populated subdivisions, ranches and recreational parks in MTA7, MTA4 and MTA6. No effort was made to identify private homes, private land, ranches, high-use recreation areas. (CASUAL USE AGREEMENT: Page 4, #16; "Pilots will avoid any areas identified on by BLM as avoidance areas, including an area within one-half mile distance outside of RGFO's high-use recreation area".) BLM public land located in MTA7 and MTA4 that include LZs 701, 702, 703, 704, 705, 706, 401 thru 410, surrounding and located near Lakemoor West Subdivision in Teller County is high-use recreational used 365 days a year: hiking, camping, horseback riding, hunting, fishing.
 - b. LZs omitted from BLM's Casual Use Agreement, Page 3, #6, were being landed on by helicopters, as seen by residents. Helicopters were landing on private land, as seen by residents. Apparently landing on private land is not a priority concern to the pilots or Fort Carson as their instruments and mapping should indicate they are not on public BLM. **NO CONTROL, NO ACCOUNTABILITY.**
 - c. LZs were located on private land on earlier maps. They have since been relocated to BLM land. A little unprofessional and sloppy, don't you think?
3. **The Forest Service encouraged Fort Carson to find other places that have less impact on other forest users and away from urban interface areas and identify areas that are compatible, where there are no roads and trails.** (Colorado Springs Independent Newspaper)
 - a. There have been two reported helicopter crashes on Forest Service land.
 - b. Teller, Park and Fremont Counties are not isolated or remote. These counties are highly populated and widely used for recreation. HAMET will have a devastating negative effect on tourism, recreational public use and home values. **We have roads, we have trails!**
 - c. As shown by the maps created by **the Coalition for the Upper South Platte**, HAMET will be a destructive force on the migration corridors and production areas of the Bighorn Sheep and the Elk. The majority of the LZs are in these migration and production areas. The constant influx of helicopters with noise levels reaching as high as 92 decibels for a height of 200 feet (HAMET Proposal, Page 7, #e, Noise Levels), the toleration for wildlife will be zero. This noise study was performed for the Fort Carson base. This is a study at 200 feet – not for the

mountains where sound carries and bounces off ridges and canyons. Not for helicopters landing, taking off, performing low level, contour and NOE where height levels can be zero feet, 25 feet, 80 feet, 200 feet depending on the terrain. Wildlife does not build a tolerance for this type of disturbance, they do not reproduce and they leave. PEOPLE DO NOT BUILD A TOLERANCE EITHER!

- d. Historic Ute culturally modified trees, including prayer and medicine trees, are found on private and public land throughout the area. (Cellinda Kaelin, President, Pikes Peak Historical Society) These are marvelous living artifacts of the Tabeguache Ute culture from hundreds of years ago. They should be protected and preserved, not torn down and destroyed by helicopters performing low-level and NOE flying.
4. **WILDFIRE DANGER:** Most of the fire departments are volunteer. They do not have the manpower, funds or equipment to fight the type of fires caused by a helicopter crash or malfunction. Capt. Matthews was asked who would be responding to a crash or emergency landing. His response was that when the military was on the ground in whatever county the event occurred, the military will be under the same jurisdiction as the county's residents. This means that it is the County's responsibility, expense and problem, NOT FORT CARSON'S problem.

By STAGE III WILDFIRE DANGER you can hit two rocks together and start a fire. Teller, Park and Fremont Counties have been in a severe drought for years. Due to the terrain of steep canyons, dense trees and underbrush natural to the mountains, wind and air currents, a **wildfire would be impossible to fight and unstoppable in Lakemoor West Subdivision and in the canyon below Booger Red Hill (MTA4).**

5. **CONTROL AND ACCOUNTABILITY:** Capt. Matthews stated that Fort Carson has little control of the helicopters flying from other bases such as Peterson, Buckley, or Pueblo Airport.
 - a. **HAMET** Proposal (Page 7 & 8, #f, Flight Paths) indicates there is no control of any helicopters flying to or in the MTAs, as the proposal states as follows: **There are no defined air corridors or designated routes from Fort Carson to these areas ... individual aircrews will design and plan a route to a specified LZ ...flight altitudes within the MTA can be low level (80-200 feet above the highest obstacle). (Performed within the confines of the MTA.)**
 - b. Lakemoor West Subdivision is almost totally within the confines of MTA7 and MTA4. This means helicopters will be flying and performing training over our homes at 80-200 feet day and night. Noise decibels can be damaging at these height levels. **This is not allowed on military bases – WHAT IS WRONG WITH THIS PICTURE?**
6. **LIABILITY:** Who will be liable for the damage or destruction of private homes, land, livestock, public buildings or injury/death of private citizens caused by a military helicopter crash or malfunction? Will Fort Carson or BLM be held responsible ethically and monetarily?
 - a. BLM public land and Forest land should be protected and cared for so that the people of this great nation can enjoy the wonder and beauty of what open space we have managed to preserve.

Thank you,
Sandi Witcher
196 Elliott Drive

Florissant, Co 80816



FW: Article in American Cowboy "NOT FOR SALE" a ARMY land grab with connection to HAMET

Steve Witcher <s.witcher@ccvnet.net>

Mon, Jan 26, 2015 at 4:43 PM

To: nkeohane@blm.gov, RGFO_comments@blm.gov

Nancy,

This came back as I had the wrong email address for you and Rfgo. Resending.

Steve Witcher

From: Steve Witcher [mailto:s.witcher@ccvnet.net]

Sent: Monday, January 26, 2015 3:51 PM

To: 'nkeohane@blm.com'; 'rfgo_comments@blm.com'; 'alandleigh@q.com'; 'ambergallegos@msn.com'; 'BACHORD@aol.com'; Blair Nowlin (t.blair@pcisys.net); Bob Paige (J7Paige@aol.com); 'chdollwet@msn.com'; Cindy Curtis (candjcurtis@aol.com); 'cindylyager@gmail.com'; Dave Adams; Dianna Taylor (deadmentalk56@gmail.com); 'dlflinn@aol.com'; Don Shaw; 'ellen@ekrus.org'; 'estellaj22@yahoo.com'; 'fmbosley@gmail.com'; 'fredcoolidge@yahoo.com'; 'gmbkgarcia@gmail.com'; 'hanksn@ccvnet.net'; 'hillflorissant@aol.com'; 'hparker100@aol.com'; Jeff Wearden; 'jennieowen4@aol.com'; Jim Curtis (elkinjwc@gmail.com); 'JNofthecross@msn.com'; Joy Adams (joy4u4905@yahoo.com); 'jsanpietro@att.net'; K C Jones (kcj@ccvnet.net); Karl Specht (aaapiano@earthlink.net); 'ken@tellercanyon.com'; 'Kwright@wildblue.net'; 'lambjo2@gmail.com'; 'lherzing@compactceramics.com'; Lorie Schleicher; Luanne Jones; 'Luckyspilman@hotmail.com'; Marilyn Werner; Max Engelhardt; Melinda Wearden; 'meridlgatterman@gmail.com'; Michael McCullough; nallen@satx.rr.com; 'nancyradecki@gmail.com'; Norma Bergeman (jnbergeman@wildblue.net); 'pattivp@gmail.com'; 'randgard@yahoo.com'; 'rcsbob@mesanetworks.net'; Roger Powers; 'roy.ayala@live.com'; 'sandiwitcher@ccvnet.net'; 'simoneyes@hughes.net'; 'Skbrier@gmail.com'; 'snoopers33@gmail.com'; Stephen Witcher (s.witcher@ccvnet.net); 'stephendellacroce@hotmail.com'; 'tschiemmr@b@aol.com'; 'wayne819@comcast.net'; 'wbs@texasbb.com'; 'Wyndshadow3@yahoo.com'; 'Carol Ekarius'; 'Celinda R Kaelin'; 'conductorrandy@gmail.com'; 'ctchnrls@aol.com'; 'dcurrie911@hotmail.com'; Gayle Currie (rossmere@msn.com); 'Greg Liverman'; 'Heather Gaffney'; 'hvbarranch1@aol.com'; 'irene.dancingbrush@gmail.com'; 'jimelkh@aol.com'; 'Joe Tanis'; Kathy Graff; 'kayeinco@aol.com'; 'Lisa Patton'; 'lynnwilkinson@q.com'; 'mclfish@hotmail.com'; 'mdteller2012@yahoo.com'; 'mhb3@yahoo.com'; 'Oatman-Gardner, Annie (Bennet'; 'Pat Hill'; 'PellegrianoL@co.teller.co.us'; 'rich.riley4@gmail.com'; 'mlriley@msn.com'; sandy sickafoose; 'shaun.brackin@gmail.com'; 'Stephanie Landsittel'; 'tolovetolaugh@aol.com'; 'vicki@truewestcolorado.com'; 'virgiehaynes@aol.com'; Wendy Bruggink (hobbits63@aol.com); 'wendyorrproperties@gmail.com'; 'ypatterson99@gmail.com'

Subject: Article in American Cowboy "NOT FOR SALE" a ARMY land grab with connection to HAMET

Hello,

This article goes into detail about an ARMY land grab in the Southern part of Colorado and how the ranchers fought it. Some of the laws were changed so that the Army cannot take land like they did at Pinon Canyon. However, since they can no longer do land grabs it may be that they are approaching the BLM to do the landing sites. With our exit from Afghanistan and Iraq is there a proven need for the landing sites? I would have to question that! Secondly, there are anthropological sites in the area that the Army was trying to get and the

Army would have to preserve any archeological site on land under section 106 of the Historical Archeological Act. We have living artifacts in the area of the landing zones and I would presume that Section 106 would pertain to the Army protecting those sites and may pertain to the BLM having to protect those sites.

PLEASE READ THIS ARTICLE! Pass on to anyone that might have an interest in HAMET.

Stephen Witcher



American Cowboy Range War Not for Sale.pdf

6268K



FW: Comment on Hamet

Steve Witcher <s.witcher@ccvnet.net>
Reply-To: s.witcher@ccvnet.net
To: RGFO_comments@blm.gov
Cc: "Keohane, Nancy" <nkeohane@blm.gov>

Tue, Oct 28, 2014 at 12:24 PM

I sent this earlier and asked for a read receipt. Did not get it so resending to make sure it was received.

Thank you,

Stephen Witcher

From: Steve Witcher [mailto:s.witcher@ccvnet.net]
Sent: Saturday, October 25, 2014 3:20 PM
To: 'RGFO_comments@blm.gov'
Cc: 's.witcher@ccvnet.net'
Subject: Comment on Hamet

To whom it may concern:

I am a resident of Lakemoor West Subdivision near the corner of CR11 and CR112. Above us is a BLM property that is designated as landing zones 701 thru 704, right off of Teller County CR11 and at mile marker 5 and landing zone 705 is on the East side of 4 Mile Creek directly across from landing zones 701-704. From looking at the maps landing zone 704 is directly behind my house and is approximately 1000 feet away based on a mapping software that has been used. Landing zone 703 is also near and again is not that far from my house and our next door neighbor and very close to other neighbors house on Elliott Drive, maybe 2000 feet away maximum distance. Many of the helicopters come in from the North and fly directly over our house at an altitude of 100 – 200 feet above the house and trees. Sometimes the helicopters have been close enough to the house I have waved to the pilots and they have waved back. The downdraft and the noise shakes the whole house and scares our animals. We are against the Army using LZ 701, 702, 703, 704 and 705 as it will impact the residents of Lakemoor West.

We feel that it is important that our military helicopter pilots have the best training but there are numerous areas on BLM land that should provide areas for training that are not near residential neighborhoods.

Stephen Witcher

196 Elliott Drive

Florissant, Co 80816

719-689-0783



FW: Comment on Hamet

Steve Witcher <s.witcher@ccvnet.net>
Reply-To: s.witcher@ccvnet.net
To: RGFO_comments@blm.gov
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Stephen Witcher
196 Elliott Drive
Florissant, Co 80816
719-689-0783



Fwd: Comment on Hamet

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Tue, Oct 28, 2014 at 2:12 PM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----
From: s.witcher@ccvnet.net <s.witcher@ccvnet.net>
Date: Tue, Oct 28, 2014 at 1:47 PM
Subject: Re: Comment on Hamet
To: "Keohane, Nancy" <nkeohane@blm.gov>

Nancy,
I got this but did not know if you got my comments to the HAMET. I appreciate your call today and will let everyone know that they will get a response from you that their comments were received.

Steve Witcher
Sent from my iPad

On Oct 28, 2014, at 1:26 PM, Keohane, Nancy <nkeohane@blm.gov> wrote:

Hi Steve, Here is the mail I sent on Oct 23. I wonder if it went into your email spam or junk file?

Good Afternoon Steve.

Attach is the Fort Carson Plan of Development application for HAMET activities (which is also on the website). The web address for more information on HAMET application for use of BLM lands is <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

We have posted better maps than the attached Plan of Development on our web page (address above) that you can open through Google Earth.

You may submit your comments on the proposal to me at this address or the RGFO_comments@blm.gov

Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212

719-269-8531 office number

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Stephen Witcher

196 Elliott Drive

Florissant, Co 80816

719-689-0783

|

<PLAN OF DEVELOPMENT Change 1 (3 SEP 13).docx>

12/16/14

Mr. Keith Berger, Field Manager
Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212

Dear Keith Berger and Nancy Keohane,
Thank all of you for having the meeting on December 4, 2014 at the Cripple Creek Heritage Center. It was most valuable to hear the position of Fort Carson and the BLM. Keith Berger and Captain Mathews did a great job.

Let me state for the record that we are not opposed to Fort Carson training helicopter pilots for high altitude. I have a good friend that was a helicopter pilot for the Army and he stated that it is much different flying a helicopter at this altitude vs at sea level. However, the proposal did not take into effect what these training areas would do to the heavy concentration of people in the area.

1. MTA 7 must be eliminated from the landing zones as well as MTA 4. In MTA 7 you have 46 homes impacted by the landing zones. Landing zone 704 is 1000 feet from my house and is less than 1000 feet from a neighbor's house who lives in Navajo Mesa. Landing zone 705 is 425 feet from a home being built. This is inexcusable as anyone could tell that there was a concentration of homes in MTA 7 even though Captain Mathews said that they could not see the homes. It was very sloppy work on picking the landing zones by Fort Carson. MTA 7 is in a very densely populated area as you can see on the google map showing Lakemoor West houses in green diamonds and houses in close proximity to Lakemoor West in yellow diamonds. (See Lakemoor and surrounding area map) MTA 7 is in an extremely high wildfire area as designated by the Coalition for the Upper South Platte. (Wildfire Hazard Rating map attached)
2. Lakemoor West has a total of 46 houses, within the 1000 meter circles, directly impacted by MTA 7 and LZ 410. All other landing zones have a total of 3 houses identified within the 1000 meter circles. Please see the map of Lakemoor West showing the 1000 meter circles and the homes affected and also the Red Zone Houses document showing the number of houses in each landing zone.
3. MTA 4 must also be eliminated in that it is less than 1000 feet from the end of Lakemoor West Subdivision and with a home at the end of the valley. The owners have stated that when a helicopter flies over their dishes rattle as well as other things in their house. In MTA 4 is an extreme canyon that if there was a fire there would not be a way to stop it before it got to Lakemoor West. It would be like Waldo Canyon fire and you know the disastrous results that that fire incurred. See the wildfire map attached provided by the Coalition of the Upper South Platte. The owners of the Shiloh Ranch which is in MTA 4 has stated that helicopters have almost hit their windmill which would crash a helicopter and probably burn down the homes in that area. Below the Shiloh ranch is the Green Ranch. This ranch has an Elk wintering area and

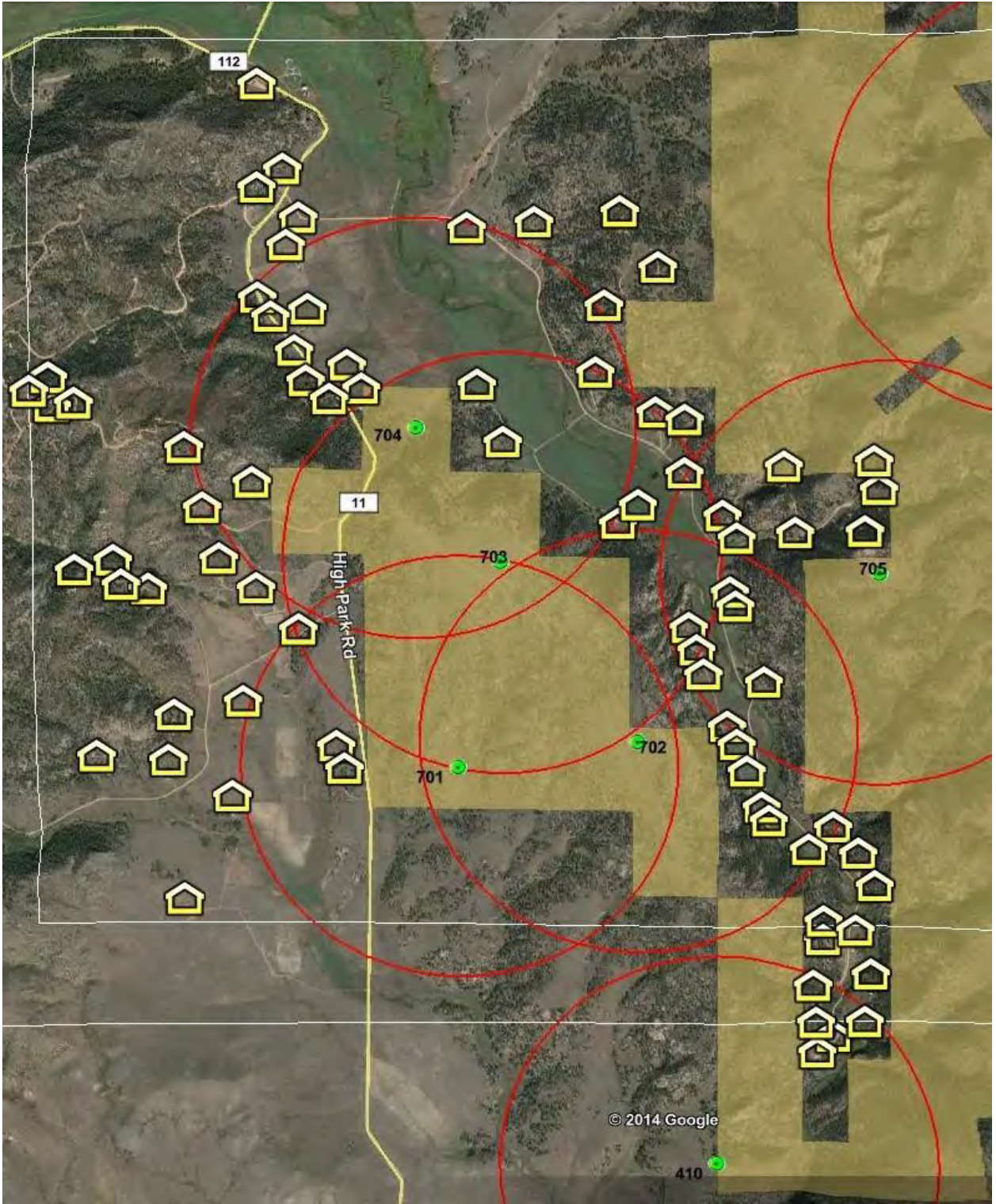
also there is a lot of cattle calving going on. It is known that helicopters can disrupt the calving operation for a rancher. Please look at the maps attached showing the concentration of housing and the wildfire danger provided by the Coalition for the Upper South Platte.

4. In reviewing all of the MTA areas you will find that landing zones 701, 702, 703, 704, 705, 706, 401, 402, 404, 405, 406, and 410 are in the Species and Wildfire areas. The species map shows that these areas are in the Big Horn overall range and are very close to the Big Horn production areas. Also areas 701, 702, 703, 704, 705, 706, 410, 401, 402, and 403 are in the Colorado Natural Heritage Program Conservation Area which is a protected area for biodiversity area as shown in the Coalition for the Upper South Platte Conservation Area map. Also there is a letter from Carol Ekarius, Executive Director for the Coalition for the Upper South Platte giving her concerns for these landing zones. See attached.
5. Surrounding MTA 7 is the Gaffney Ranch and BLM land that is leased to the Gaffney ranch. The ranch is dependent on the BLM lease that they have to graze cattle on the BLM land which is in the MTA 7. It is a known fact that the noise of helicopters can have an adverse effect on the calving operations of the ranch. With MTA 7 being so close to the ranch itself and with the grazing rights that BLM has leased to the Gaffney ranch, it would appear that MTA 7 should be totally eliminated as it directly affects the rancher's ability to produce income.
6. With all the 37 other Landing Zones and only 3 homes affected it would be in the best interest of the BLM to make sure that homes are not affected by the HAMET. Landing Zones 701–706 and 401-410 should be removed as Landing Zones due to the high wildfire danger, the Big Horn production area and the migration of Elk. MTA 7 and MTA 4 are very close to CR 11 which is a scenic byway. The area is dependent on the road for recreation and the gambling in Cripple Creek. As stated by the 4 Mile Fire Department Fire Chief, helicopters flying close to CR 11 are bound to cause automobile accidents when flying within close proximity to the road. By removing MTA 7 and MTA 4 Fort Carson will have 27 Landing Zones which should be enough for the training that they estimated they will have.

With regards to the above information and the information that was brought forth at the Cripple Creek Heritage Center meeting on December 4th, 2014 the BLM should totally eliminate MTA 7 and MTA 4 from the Fort Carson HAMET. As stewards of the land and making sure that the land is used appropriately for recreation and hunting there is no other choice that you have but to eliminate those areas. Again we are not against the training that is necessary, it just needs to be located in areas not heavily populated, in an extreme fire danger area and in Big Horn Sheep areas.

Sincerely,

Stephen T. Witcher
196 Elliott Drive
Florissant, CO 80816
719--689-0783



Map provided by K. C. Jones

RED ZONE HOUSES

The "Red Zone" is the 1000 meter circle around an LZ where low level training flights down to zero feet altitude above ground level (AGL) are allowed.

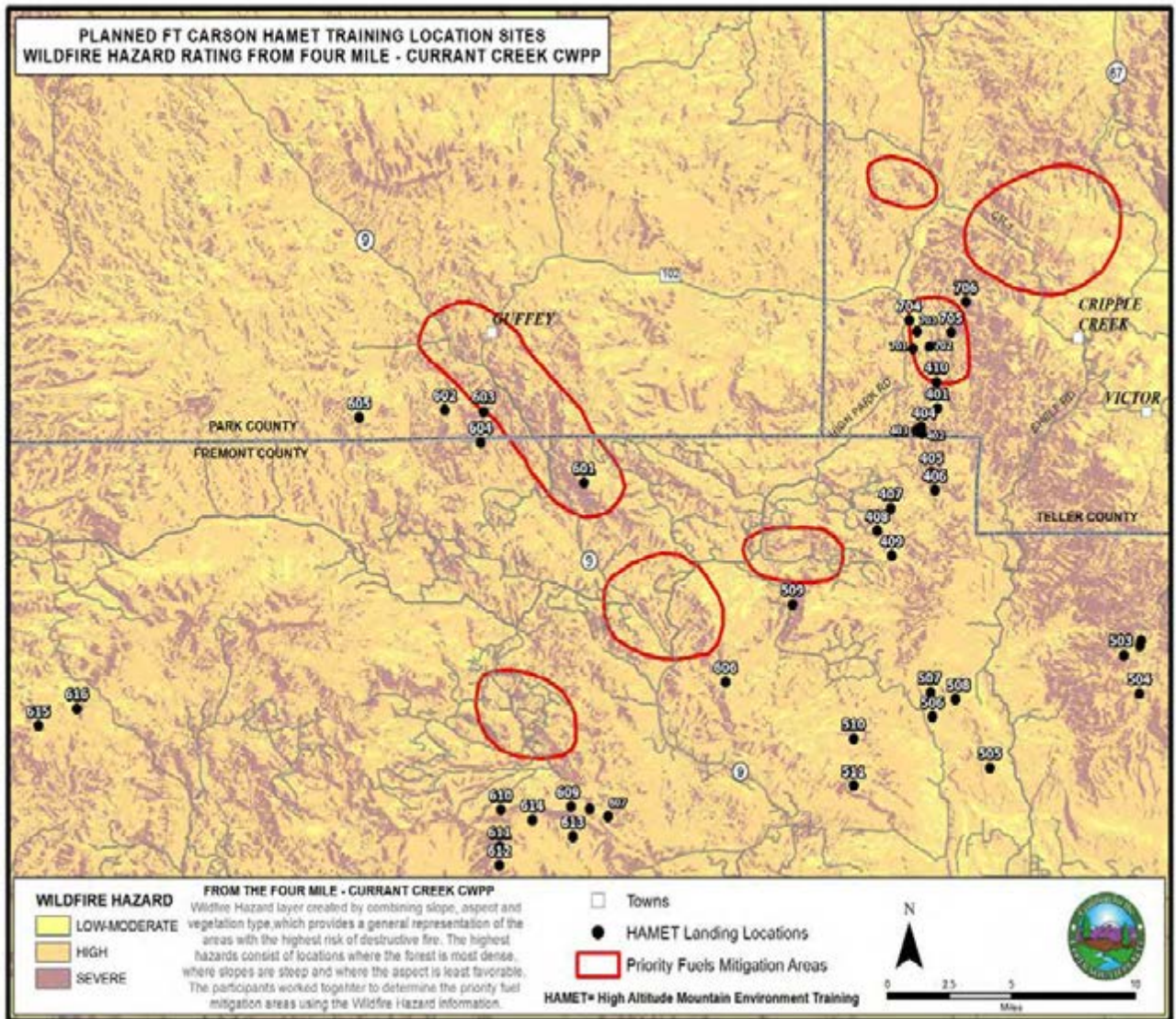
Total Number of Lakemoor West and Neighboring Houses in the Red Zone of Six LZ's (410 and 701 thru 705)

410	05
701	03
702	06
702+703	01 (702+703 says the house is in 2 red zones)
702+705	06
702+703+705	01 (This house is in 3 red zones)
703	02
703+704	04
703+705	01
704	11
705	06
TOTAL	46

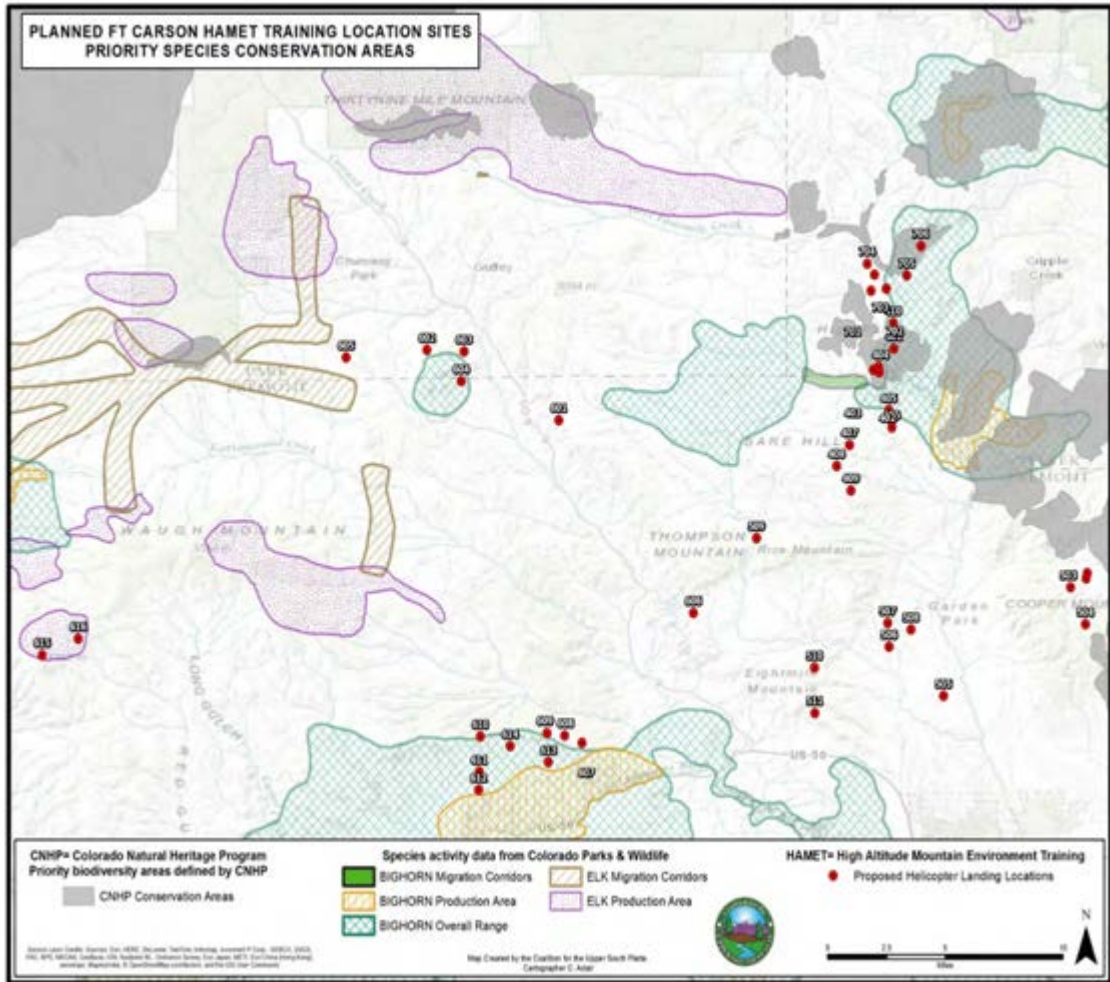
Total Number of Houses in Red Zones for All 37 Other LZ's

401 thru 409	02
501 thru 511	00
601 thru 616	01
706	00
TOTAL	03

Document provided by KC Jones.



Map provided by the Coalition for the Upper South Platte



Map provided by the Coalition for the Upper South Platte



Coalition for the Upper South Platte

Post Office Box 726

Lake George Colorado 80827

October 30, 2014

Dear BLM Partners:

This letter is in response to Development Plan the Fort Carson to provide High Altitude Mountain Environmental Training (HAMET) for the Combat Aviation Brigade for use of BLM lands in Park, Teller and Fremont Counties.

The attached GIS data and maps were gathered from these sources: Colorado Parks and Wildlife, Species Activity Data; Colorado Natural Heritage Program's Priority Biodiversity Areas; The Four Mile - Curren Creek Community Wide Fire Protection Plan; and the Army's HAMET, High Altitude Mountain Environment Training Proposed Helicopter Landing Locations.

Numerous areas proposed for landing sites correspond to important areas of wildlife and critical biodiversity habitat, and some are in high priority areas for wildfire risk. Based on these issues, we encourage BLM to consider:

- ~ Sites 615 and 616: elk production areas; eliminate training and landing during elk production (calving season).
- ~ Sites 607 - 614: bighorn sheep range, and sites that border sheep production areas; eliminate or strictly reduce training and landing zones.
- ~ Sites 401 - 404 and 703 - 706: potential conservation areas identified by the Colorado Natural Heritage Program; eliminate or strictly reduce training and landing zones.
- " Sites 401, 701- 705: high wildfire risk areas; eliminate training and landing during seasons of drought, specifically during Stage II fire ban rather than Stage III (as indicated in the proposed HAMET plan).
- , Sites 401-406 and 702,705 and 706: multiple layers of considerations; eliminate or strictly reduce training and landing zones.

If these sites of training and landing cannot be avoided, we recommend that the Army work closely with Colorado Parks and Wildlife and Colorado Natural Heritage Program to develop more comprehensive BMP's for these resources at risk.

Carol Ekarius

Executive Director

Coalition for the Upper South Platte

719-748-0033

www.u.-PPersQuthQlatte.org



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

HAMET Letter

Steve Witcher <s.witcher@ccvnet.net>
To: nkeohane@blm.gov, RGFO_comments@blm.gov

Mon, Dec 22, 2014 at 8:14 PM

Nancy: Here is my letter to the Hamet Proposal.

Sandi Witcher



HAMET LETTER 2. 12.22.14docx.docx
19K

HAMET

Fort Carson has been expanding and creating a Combat Aviation Brigade that has contracted bringing in out-of-state combat aviation brigades from all branches of the military; to include pilot and helicopters from the Army, Marines, Air Force and Navy pilots.

1. THE HAMET PROPOSAL SHOULD BE CANCELLED WITH NO CASUAL USE AGREEMENT REINSTATEMENT. I find the HAMET Proposal and the past Casual Use Contract to train pilots untrained in high altitude flying dangerous and extremely unethical. The irresponsibility shown by tenant and non-tenant helicopter pilots towards the residents of Teller, Park and Fremont Counties has indicated their indifference to the possible destruction of homes, public and private lands, forest, wildlife, livestock and extreme danger of wildfire. This seems to be more about Army expansion, politics and power than about training. Alternative location suggestions and the use of simulators were directed to the Fort Carson representative. Simulators are available in Texas and Colorado, but we were told this was not an option. A reason was not given.
2. Fort Carson's mapping of MTAs and LZs in Teller, Park and Fremont Counties were inaccurate and questionable.
 - a. MTAs encompass highly populated subdivisions, ranches and recreational parks in MTA7, MTA4 and MTA6. No effort was made to identify private homes, private land, ranches, high-use recreation areas. (CASUAL USE AGREEMENT: Page 4, #16; "Pilots will avoid any areas identified on by BLM as avoidance areas, including an area within one-half mile distance outside of RGFO's high-use recreation area".) BLM public land located in MTA7 and MTA4 that include LZs 701, 702, 703, 704, 705, 706, 401 thru 410, surrounding and located near Lakemoor West Subdivision in Teller County is high-use recreational used 365 days a year: hiking, camping, horseback riding, hunting, fishing.
 - b. LZs omitted from BLM's Casual Use Agreement, Page 3, #6, were being landed on by helicopters, as seen by residents. Helicopters were landing on private land, as seen by residents. Apparently landing on private land is not a priority concern to the pilots or Fort Carson as their instruments and mapping should indicate they are not on public BLM. **NO CONTROL, NO ACCOUNTABILITY.**
 - c. LZs were located on private land on earlier maps. They have since been relocated to BLM land. A little unprofessional and sloppy, don't you think?
3. **The Forest Service encouraged Fort Carson to find other places that have less impact on other forest users and away from urban interface areas and identify areas that are compatible, where there are no roads and trails.** (Colorado Springs Independent Newspaper)
 - a. There have been two reported helicopter crashes on Forest Service land.
 - b. Teller, Park and Fremont Counties are not isolated or remote. These counties are highly populated and widely used for recreation. HAMET will have a devastating negative effect on tourism, recreational public use and home values. **We have roads, we have trails!**
 - c. As shown by the maps created by **the Coalition for the Upper South Platte**, HAMET will be a destructive force on the migration corridors and production areas of the Bighorn Sheep and the Elk. The majority of the LZs are in these migration and production areas. The constant influx of helicopters with noise levels reaching as high as 92 decibels for a height of 200 feet (HAMET Proposal, Page 7, #e, Noise Levels), the toleration for wildlife will be zero. This noise study was performed for the Fort Carson base. This is a study at 200 feet – not for the

mountains where sound carries and bounces off ridges and canyons. Not for helicopters landing, taking off, performing low level, contour and NOE where height levels can be zero feet, 25 feet, 80 feet, 200 feet depending on the terrain. Wildlife does not build a tolerance for this type of disturbance, they do not reproduce and they leave. PEOPLE DO NOT BUILD A TOLERANCE EITHER!

- d. Historic Ute culturally modified trees, including prayer and medicine trees, are found on private and public land throughout the area. (Cellinda Kaelin, President, Pikes Peak Historical Society) These are marvelous living artifacts of the Tabeguache Ute culture from hundreds of years ago. They should be protected and preserved, not torn down and destroyed by helicopters performing low-level and NOE flying.
4. **WILDFIRE DANGER:** Most of the fire departments are volunteer. They do not have the manpower, funds or equipment to fight the type of fires caused by a helicopter crash or malfunction. Capt. Matthews was asked who would be responding to a crash or emergency landing. His response was that when the military was on the ground in whatever county the event occurred, the military will be under the same jurisdiction as the county's residents. This means that it is the County's responsibility, expense and problem, NOT FORT CARSON'S problem.

By STAGE III WILDFIRE DANGER you can hit two rocks together and start a fire. Teller, Park and Fremont Counties have been in a severe drought for years. Due to the terrain of steep canyons, dense trees and underbrush natural to the mountains, wind and air currents, a **wildfire would be impossible to fight and unstoppable in Lakemoor West Subdivision and in the canyon below Booger Red Hill (MTA4).**

5. **CONTROL AND ACCOUNTABILITY:** Capt. Matthews stated that Fort Carson has little control of the helicopters flying from other bases such as Peterson, Buckley, or Pueblo Airport.
 - a. **HAMET** Proposal (Page 7 & 8, #f, Flight Paths) indicates there is no control of any helicopters flying to or in the MTAs, as the proposal states as follows: **There are no defined air corridors or designated routes from Fort Carson to these areas ... individual aircrews will design and plan a route to a specified LZ ...flight altitudes within the MTA can be low level (80-200 feet above the highest obstacle). (Performed within the confines of the MTA.)**
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Thank you,
Sandi Witcher
196 Elliott Drive
Florissant, Co 80816



HAMET Comment / Request

daniel currie <dcurrie911@hotmail.com>

Tue, Oct 21, 2014 at 4:53 PM

To: "nkeohane@blm.gov" <nkeohane@blm.gov>, "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, Debbie <dcurrie947@msn.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>, "ksullivan@blm.gov" <ksullivan@blm.gov>

Hi Nancy.

I have been doing some additional research and came across a federal law entitled "Federal Land Policy and Management Act of 1976" (FLPMA, Public Law 94-579 94th Congress).

While I expect that you have direct access to it I pasted the URL below for your convenience.

<http://www.blm.gov/flpma/FLPMA.pdf>

Please pay special note to Sec. 302 (d) (1) through (d) (6) on pages 21 and 22. Stated therein the Sec. of Interior may, after consulting with the Governor of Alaska, issue to the Sec. of Defense a nonrenewable general authorization to utilize public lands in Alaska for the purposes of military maneuvering or training.

Allowance for military training on BLM lands is not mentioned in any other section of the law. It is my assertion that because the FLPMA law explicitly allows for military training in Alaska (and Alaska only) that it implicitly defines military training in any other BLM lands as unlawful.

My first request is that the BLM investigate and show proof that allowing the Army to conduct military training on BLM lands in Colorado as requested in the HAMET proposal does not violate this Federal Law.

Secondly, if by some chance it is shown to be lawful I would like the BLM to impose the same level of authorization as specifically spelled out in those same sections. Requiring involvement of the Sec. of Interior, Gov. of Colorado, and Sec. of Defense as well as any Public Safety notifications deemed necessary.

Sincerely,
Dan and Debbie Currie



HAMET The non-tenants do not respect Colorado.

Debbie <dcurrie947@msn.com>

Sat, Dec 6, 2014 at 7:57 AM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, Dan <dcurrie911@hotmail.com>

Debbie Currie
611 Rockridge Loop
Canon City
dcurrie947@msn.com

How about only allowing Fort Carson choppers the use of public lands? That would be 600 landings as opposed to 61,920 non-tenant landings. The resident complaints are caused by non-tenants.

I called Lori Waters, Fort Carson Public Relations on 6 occasions in 2013 with complaints of low flying and at times hovering helicopters over our home. She returned my calls and stated every time there were no Fort Carson choppers in our area at that time and it had to be choppers from other bases causing the problems and they had no control over them.

In the 2 public meetings that have been held the resident complaints have been echoed the same as ours. The non-tenants do not respect Colorado.



Pony fire on BLM caused by military training accident

daniel currie <dcurrie911@hotmail.com>

Wed, Oct 22, 2014 at 9:29 PM

To: "nkeohane@blm.gov" <nkeohane@blm.gov>, "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, "blm_co_rg_comments@blm.gov" <blm_co_rg_comments@blm.gov>, Debbie <dcurrie947@msn.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>, "ksullivan@blm.gov" <ksullivan@blm.gov>

Hi Nancy and all.

I could find very little details regarding the type of military training that caused the Pony fire in UT this last summer but I think that it is still worth noting in your HAMET Environmental analysis.

In the case of the Pony fire the public was relatively lucky since there were no lives or structures lost but the fire did consume 1500 acres. Still, the potential of a fire must not be taken lightly. Environmental conditions in this region vary tremendously but fires can cause significant damage as illustrated by the Royal Gorge fire in Fremont County which consumed over 3,000 acres and the loss of 48 structures and the Hayman fire in Teller County which caused nearly \$40 million in firefighting costs, burned 133 homes, 138,114 acres, and forced the evacuation of 5,340 people.

According to the Army there have been over 300 non combat related helicopter crashes in Afghanistan. Fremont, Teller and Park counties were chosen for the HAMET proposal specifically because the conditions in this area closely mirror those of Afghanistan. Logic dictates that allowing landings on BLM lands which mirror those in Afghanistan will result in avoidable, similar non combat crashes. There is a reasonable expectation that one or more of such crashes will lead to a fire. An avoidable fire.

As part of the investigation I would like the BLM to provide a summary of all the fires in the US which originated on BLM lands which resulted in loss of civilian property or lives. Secondly I would like the BLM to require the Army to disclose the conditions of each of the over 300 crashes in Afghanistan and to fully disclose the resulting damage to the surrounding areas for each of those crashes.

<http://www.ksl.com/?nid=148&sid=30322341>

Sincerely,

Dan Currie

Pony Fire Details

This fire will no longer be included in the DEN Situational Reports.

- 1,500 acres burned
- This fire is now 100% contained.
- Type 1 Incident Command Team
- Fire crews and those traveling in the area to please slow down. Hoses, equipment, and fire personnel in the area
- BLM lands
- Location: Toiyabe County, Stansport Springs area, Lat 40.949 N Long 112.461 W
- Started: 01/12/14
- Resources committed: 4 BLM engines, 3 State of Utah engines, 1 non-urban team, 1 team, 1 fire Dept, 1 smoke tower, 1 quantity, 100 attack, 100, 4 Single Engine Air Tankers, 1 Type 1 helicopter (filled with 5000 BLM aircraft), 1 Type 1 LA helicopter.
- Team: 1000/100 2/10/14/14/14



pony fire.png
405K



Fort Carson's HAMET proposal comment and request

daniel currie <dcurrie911@hotmail.com>

Sat, Oct 25, 2014 at 10:04 AM

To: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

Cc: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, "alcalam@canoncitydailyrecord.com" <alcalam@canoncitydailyrecord.com>, Debbie <dcurrie947@msn.com>, "ryanhoffman@themountainmail.com" <ryanhoffman@themountainmail.com>, "news@koaa.com" <news@koaa.com>, "news@kktv.com" <news@kktv.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>, "usarmy.carson.hqda-ocpa.list.pao-comrel@mail.mil" <usarmy.carson.hqda-ocpa.list.pao-comrel@mail.mil>, "letters@csindy.com" <letters@csindy.com>, "nkeohane@blm.gov" <nkeohane@blm.gov>, "rwelch@blm.gov" <rwelch@blm.gov>, "janeardsmith@comcast.net" <janeardsmith@comcast.net>

Hello Nancy and all.

Additional research regarding the HAMET proposal has lead me to the attached page from the BLM WEB site regarding Military Withdrawals. I have pasted the pertinent section below for your convenience. http://www.blm.gov/wo/st/en/prog/more/lands/military_withdrawal.html

Military Withdrawals

Public lands may be withdrawn and reserved for military training and testing in support of our national defense requirements. Such withdrawals and reservations are authorized by Act of Congress (for withdrawals of over 5,000 acres) or by order of the Secretary of the Interior (for withdrawals of less than 5,000 acres).

As part of the investigation I request that the BLM consider the HAMET proposal as a request of Military Withdrawal and apply the legal and constitutional rules and regulations required for such a request.

Secondly I would like the BLM to investigate the legal and constitutional implications of approving the HAMET proposal which includes private properties within the MTAs. What legal rights does the BLM have to approve a proposal which defines Military Training Areas which encompass private property?

And finally public safety must be held in the highest regard when considering military training. While I am sure that the pilots will take care to not put civilian lives in jeopardy the sheer nature of NOE and Contour flying puts everyone in the vicinity at risk. It is impossible for the pilots to know what or WHO lies beyond every hill or around every tree. Such high risk maneuvers must not be undertaken when there is even the slightest chance of putting

civilian men, women and children at risk. As such the public and our public officials must demand that the Army take the appropriate and necessary steps to assure public safety.

This requires that the Army officially file for Withdrawal and Reserve status for such a high risk training area. Anything less would be a grievous effort to circumvent the system in an attempt to save time at the expense of civilian safety.

When evaluating the above requests I would like the BLM to consider the following:

Regarding "acreage":

- Withdrawals of Public Lands over 5,000 acres for military training requires an Act of Congress to approve. The following must be considered when determining the actual size of the requested acreage.
 - While the published acreage of the LZs are less than 250 acres the acreage of the area surrounding each of the LZs at a radial distance of 1,000 meters is approx. 775 acres which amounts to more than 33,000 acres in total. Additionally the MTAs are vastly larger and include both public and private land.
 - Since the Army itself defines the 5 zones encompassing the 43 LZs as Military Training Areas (MTAs) I believe that the total acreage must be considered and not just the area of the 43 LZs (see attached MTA definition from the Fort Carson HAMET proposal).
 - Even if someone were to successfully argue that the entire MTA should not be considered then certainly the 1,000 meter approach diameters which allow NOE and Contour flights must be considered training areas which still greatly exceeds the 5,000 acre minimum.

Regarding "withdrawn and reserved":

- Given the significant volume of military activity over a prolonged period of time this request by the military must be considered an ipso facto withdrawal and not just a "Right of Way" request.
 - Fort Carson is obviously no longer content with conducting LZ trainings on BLM lands via the previously granted Casual Use Agreement and has requested that the military use be granted for a period of 10 years.
 - Per the HAMET proposal under non-tenant use - Each Task Force, on average, will complete training within 21 days while conducting continuous operations (day, night, weekends and holidays) for a total of approximately 90 days.
 - Additionally within the non-tenant use section the theoretical maximum number of non-tenant use exceeds 60,000 landings per year. By contrast according to Wikipedia the Colorado Springs Airport experienced approx. only 138,000 operations in 2013.

Sincerely, Dan and Debbie Currie

2 attachments

Picture 1c



flight patterns.JPG
63K

2) Mountain Training Area (MTA): A group of LZ's within relatively close proximity to one another that are assigned similar numbers (example: MTA 4 = Mountain Training Area 4 comprised of LZ 401, 402, 403, 404, 405, 406, 407, 408, 409, and 410). There are 5 MTAs total (MTA 4, 5, 6E, 6W, and 7), as illustrated in Picture 3b.

Picture 3b



MTAs.JPG
107K



Re: Fort Carson's HAMET proposal comment and request

Keohane, Nancy <nkeohane@blm.gov>

Mon, Oct 27, 2014 at 2:14 PM

To: daniel currie <dcurrie911@hotmail.com>

Cc: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

Thank you Dan we will be analyzing these questions you have identified in our draft environmental assessment. We will begin writing that document over the winter months. These concerns will be analyzed there.

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Sat, Oct 25, 2014 at 10:04 AM, daniel currie <dcurrie911@hotmail.com> wrote:

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Colorado Springs Airport experienced approx. only 138,000 operations in 2013.

Sincerely, Dan and Debbie Currie



Fwd: HAMET Comment / Request

Keohane, Nancy <nkeohane@blm.gov>
To: BLM_CO RG_Comments <rgfo_comments@blm.gov>

Tue, Oct 28, 2014 at 4:17 PM

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

----- Forwarded message -----
From: Sullivan, Kyle <ksullivan@blm.gov>
Date: Tue, Oct 28, 2014 at 2:44 PM
Subject: Fwd: HAMET Comment / Request
To: Nancy Keohane <nkeohane@blm.gov>

Final letter attached.

Kyle Sullivan
Public Affairs Specialist
Bureau of Land Management Front Range District
Office: (719) 269-8553 | Cell: (719) 203-0717

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----- Forwarded message -----
From: Ruth Welch <rwelch@blm.gov>
Date: Wed, Oct 22, 2014 at 3:36 PM
Subject: Fwd: HAMET Comment / Request
To: Thomas Heinlein <theinlei@blm.gov>, Steven Hall <sbhall@blm.gov>, Kyle Sullivan <ksullivan@blm.gov>, Keith Berger <kberger@blm.gov>
Cc: Jamie Harrison <jharriso@blm.gov>, Lonny Bagley <lbagley@blm.gov>, Gregory Shoop <gshoop@blm.gov>

Tom,

Sending this to you for a response back to Dan for me. Thank you!

Sent from my iPad

Begin forwarded message:

From: daniel currie <dcurrie911@hotmail.com>
Date: October 22, 2014 at 4:03:53 PM EDT

To: "rwelch@blm.gov" <rwelch@blm.gov>
Subject: FW: HAMET Comment / Request

Hello Ms Welch. I imagine that you are well aware of the HAMET proposal that is currently in the comment period.

There are a number of citizens that are concerned with the proposal and to be honest with the apparent direction that it is headed. I, for one, feel as though the Royal Gorge Field office has already decided that a deal will be made with the Army and are only looking for ways to make that happen. It feels as though the citizens are in an adversarial position against the BLM and Army.

Please don't misunderstand, the BLM representatives have been nothing but professional and helpful. But communications feel slanted toward allowing training on BLM lands and to be honest I am just plain surprised. With exception to the military training allowed via the FLPMA in Alaska I can find nothing that either allows or encourages BLM lands to be used for military training. Additionally allowing such training seems to be in conflict to BLM's own mission statement.

Any insight or encouragement that you can provide will be greatly appreciated.

Dan Currie

Date: Tue, 21 Oct 2014 17:43:22 -0600
Subject: Re: HAMET Comment / Request
From: nkeohane@blm.gov
To: dcurrie911@hotmail.com
CC: rgfo_comments@blm.gov; dcurrie947@msn.com; ja@not1moreacre.net; ksullivan@blm.gov

The BLM Realty specialist in the State Office and the lead in the BLM Washington office has reviewed the Army Application and has determined a Right of Way is our course of action. I will send what you found to our realty specialist and see if it is new information for him. If you don't hear from us sooner it will be covered in the EA. Thanks for your diligent research on this.

Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Tue, Oct 21, 2014 at 5:07 PM, daniel currie <dcurrie911@hotmail.com> wrote:

Hi Nancy. Yes I was able to see the maps. Thanks.

I am not the sharpest knife in the drawer but I would think that if use of BLM lands for military training outside of Alaska is illegal then any further activity is a waste of taxpayer money. Have BLM lawyers already determined that the military training in HAMET proposal is legal? Is it possible for me to get a copy of their findings?

Dan

Date: Tue, 21 Oct 2014 16:58:03 -0600
Subject: Re: HAMET Comment / Request
From: nkeohane@blm.gov
To: dcurrie911@hotmail.com

CC: rgfo_comments@blm.gov; dcurrie947@msn.com; ja@not1moreacre.net; ksullivan@blm.gov

Thanks Dan for this comment. We have heard a similar comment in house. You will see this addressed in the Environmental Assessment. I will add this comment to our analysis.

Did your wife share that we have added some google map points to our website. I think this will allow people to drill down further for information on landing zones. Hope this helps in your review.

Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Tue, Oct 21, 2014 at 4:53 PM, daniel currie <dcurrie911@hotmail.com> wrote:

Hi Nancy.

I have been doing some additional research and came across a federal law entitled "Federal Land Policy and Management Act of 1976" (FLPMA, Public Law 94-579 94th Congress).

While I expect that you have direct access to it I pasted the URL below for your convenience.

<http://www.blm.gov/flpma/FLPMA.pdf>

Please pay special note to Sec. 302 (d) (1) through (d) (6) on pages 21 and 22. Stated therein the Sec. of Interior may, after consulting with the Governor of Alaska, issue to the Sec. of Defense a nonrenewable general authorization to utilize public lands in Alaska for the purposes of military maneuvering or training.

Allowance for military training on BLM lands is not mentioned in any other section of the law. It is my assertion that because the FLPMA law explicitly allows for military training in Alaska (and Alaska only) that it implicitly defines military training in any other BLM lands as unlawful.

My first request is that the BLM investigate and show proof that allowing the Army to conduct military training on BLM lands in Colorado as requested in the HAMET proposal does not violate this Federal Law.

Secondly, if by some chance it is shown to be lawful I would like the BLM to impose the same level of authorization as specifically spelled out in those same sections. Requiring involvement of the Sec. of Interior, Gov. of Colorado, and Sec. of Defense as well as any Public Safety notifications deemed necessary.

Sincerely,

Dan and Debbie Currie



Currie_letter - KS.docx
84K



Re: new comments and requests regarding HAMET proposal

Keohane, Nancy <nkeohane@blm.gov>

Wed, Oct 29, 2014 at 12:15 PM

To: daniel currie <dcurrie911@hotmail.com>

Cc: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, "blm_co_rg_comments@blm.gov" <blm_co_rg_comments@blm.gov>, Debbie <dcurrie947@msn.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>, "feedback@ios.doi.gov" <feedback@ios.doi.gov>, "letters@csindy.com" <letters@csindy.com>

Thanks Dan I want to confirm receipt of your email. Thank you, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

On Wed, Oct 29, 2014 at 10:06 AM, daniel currie <dcurrie911@hotmail.com> wrote:

Hello Nancy and all,

Once again our research into the HAMET proposal has overturned some very interesting and potentially crucial data. In a Colorado Springs Independent article on March 19th 2014 they reported that a letter had been drafted by Congress and provided to the Army and or BLM which seemed to have put an end to the "casual use" permissions for military training. According to the article the letter stated that "repetitive" use may not constitute "casual use" and "may require" a NEPA review. According to the article Congress has determined national security interests to be no more important than other BLM land management responsibilities and had an additional 3 pages of restrictions.

<http://www.csindy.com/coloradosprings/army-looks-for-other-options-as-forest-service-scales-back-helicopter-zones/Content?oid=2845128>

I am astounded and deeply saddened by BLM's lack of full disclosure to the public regarding the HAMET proposal. Specifically, in this case, why didn't BLM disclose that the reason the Casual Use permits were no longer being pursued is because of a Congressional decision and subsequent letter. On several occasions we have followed the BLM requests to bring forth pertinent information via the comment period only to be told that BLM is already aware of them. This one way communication process and what can only be described as purposeful withholding of information makes the BLM appear to be hiding facts in hopes that the public will not find them, and if not noted in public comment the BLM may not be required to deal with them in an open and/or ethical manor.

While I am not accusing anyone of such acts I am sure you will agree that even the implication of impropriety or back door deals should be avoided at all costs, and that government officials should go out of their way to provide information, not withhold it.

Given this new information I have several new requests:

1st – I request that the BLM make public the letter from Congress which was referenced in the Colorado Springs Independent's article. If the letter was addressed to the Army and not in the possession of the BLM then I request that the Army make the letter public and that the BLM distribute or provide information where the letter can be obtained.

2nd - I request that the BLM hold another public meeting before any decisions or recommendations are made. In that public meeting I request that the BLM provide full disclosure of pertinent information including but not limited to the aforementioned letter from Congress, rules and regulations regarding Withdrawal and Reserving of Lands for Military use, implications of FLPMA to this request, incentives or payments that will be made to BLM for the use of the land if the proposal is accepted, and any other pertinent information that will allow the public to fully understand the legal, ethical and safety implications of this request. This must be done before a decision is made so that the public can make informed requests and comments regarding the HAMET proposal.

3rd - I request that the BLM make available to the public any and all correspondences between the Army and BLM in this matter. Including but not limited to E-mails, texts, and phone recordings. Correspondences between two government agencies regarding a request for public land use must be deemed public domain and therefore available for public review. Any communication regarding use of public lands that are not disclosed due to National Security implies that the operations themselves must be sensitive which should require that the Army needs to pursue the use of BLM lands through Withdrawal and Reserve process.

4th – I request that the BLM and Army send a registered letter to every private citizen that owns land within the 5 MTA's (Military Training Area) informing them that as a result of accepting the HAMET proposal their property will be within and considered part of a Military Training Area.

5th - I request that the BLM post all comments received during this public comments period to a page on their WEB site PRIOR to any decisions being made so that the public can view comments, questions, and requests by fellow citizens. Comments can be posted anonymously to avoid concerns of privacy. Refusal to do so further promotes the appearance of impropriety or corruption since it leaves the public to wonder if everyone's concerns, comments or requests have been fully examined.

Sincerely,

Dan and Debbie Currie



Request for Information under and to the Freedom of Information Act

daniel currie <dcurrie911@hotmail.com>

Thu, Oct 30, 2014 at 5:08 PM

To: "BLM_WO_FOIA@blm.gov" <blm_wo_foia@blm.gov>, "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, Debbie <dcurrie947@msn.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>

Hello. I would like to make a request for a document under the Freedom of Information Act. But I have never done this before and I do not know exactly how to identify the document(s) that I am asking for.

So I decided that perhaps the best way to proceed is to simply provide you with the request that I have already made to the BLM as part of the public comment period. This scoping is specific to the HAMET request from the Army (Fort Carson) to the BLM.

Most specifically I request to receive the letter mentioned below from the US Congress to the Army (or BLM). Also, I would like to receive all communications between the two agencies regarding this request including but not limited to discussions regarding compensation for the use of the land.

And finally, I think that since the government is going include privately owned property within the proposed Military Training Area that each land owner is provided with written notification prior to any discussions or scoping.

Please let me know if there is another process that I need to follow in order to correctly request and subsequently receive the requested documentation.

thanks, Dan Currie

Hello Nancy and all,

Once again our research into the HAMET proposal has overturned some very interesting and potentially crucial data. In a Colorado Springs Independent article on March 19th 2014 they reported that a letter had been drafted by Congress and provided to the Army and or BLM which seemed to have put an end to the "casual use" permissions for military training. According to the article the letter stated that "repetitive" use may not constitute "casual use" and "may require" a NEPA review. According to the article Congress has determined national security interests to be no more important than other BLM land management responsibilities and had an additional 3 pages of restrictions.

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Sincerely,

Dan and Debbie Currie



Vote NO on Fort Carson's HAMET proposal

daniel currie <dcurrie911@hotmail.com>

Mon, Oct 6, 2014 at 2:18 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, "alcalam@canoncitydailyrecord.com" <alcalam@canoncitydailyrecord.com>, Debbie <dcurrie947@msn.com>

Hi Nancy. Thank you for your time this afternoon. Per our discussion I offer the following comments, questions and requests along with my and my wife's vehement NO vote for this proposal.

I would like to first ask members of the BLM making this decision to demonstrate how it meets the following BLM mission statement?

BLM Mission Statement - - **"It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations."**

If accepting the Army's proposal does not align with the BLM mission statement then it should not be approved. Period. However, if that is not enough I offer the following.

The use of these public lands for the purpose of military helicopter landings will lead to destruction of BLM lands and is in direct conflict with the mission statement. I would like the BLM to study the long term effects on wildlife and vegetation after 10 years of heavy LZ usage. How many years/generations will be required to return the LZs to today's condition after 10 years of full use?

Contour, Low level and NOE flights will range from 25-200 ft above ground level within the MTA zone which will cause damage to our fragile High Mountain Desert vegetation and negatively impact the health and population of large and small game in those areas. I would like the BLM to conduct studies on the impacts of the wind, noise and heat on both wildlife and vegetation after prolonged operations.

The proposed HAMET agreement allows for an estimated 61,920 Non-tenant landings per year, a 2,000% increase in the Non-Tenant operations compared to the 2,858 Non-tenant operations in 2012. I would like the BLM to study the impacts of the noise pollution in the MTAs and flight paths to and from the MTAs. Noting that the average sound levels for the reported helicopters are in excess of 80 dBAs (equivalent to heavy traffic at 10 meters) at 500 ft slant and in excess of 90 dBAs (prolonged exposure at these levels can cause hearing damage) at 200 ft slant.

As previously stated but of critical importance - The proposed HAMET agreement allows for an estimated 2,000% increase in the Non-Tenant operations compared to the 2,858 Non-tenant operations in 2012. I would like the BLM to complete a study of the impacts of private citizen usage in and around the MTAs including but not limited to hunting, fishing, hiking, camping and tourism. Please be sure that the impact study includes loss of revenue to the state for hunting and fishing licenses as well as public loss of revenue for tourism impacts.

Fire Hazards from sparks or God forbid a crash will cause potentially irreparable damage to BLM, private properties and lives. A 2000% increase in activity in these MTAs also increases the likelihood of a catastrophe by the same amount. Given the increased training activity, ever increasing human population and recent draught conditions in the MTA areas I would like the BLM to complete a study of the fire likelihood and impacts. Secondly, propose mitigation and land owner compensation in the event of a fire occurs which was preventable by not allowing landings on BLM lands.

While Landing Zone's may be located within BLM boundaries the MTAs include privately owned property. If BLM approves this proposal they will indirectly be impacting every private citizen with property within and around those MTA's. Destruction of private property and decreased property values is not within the rights of the BLM to make and the BLM should take such impacts into consideration. I would like the BLM to conduct a study of the impacts of private citizens in and around the MTAs as a direct result of accepting the Army's proposal.

While I understand that the BLM cannot restrict the Army from flying over BLM or private land the BLM can deny use of land for landings and take offs. I would like the BLM to complete a study of the impacts within and around the MTAs with and without the allowance of landings.

And finally I would like the BLM to fully disclose all benefits and incentives that the BLM or its officers will obtain as a direct result of agreeing to the Army's proposal.

Sincerely

Dan and Debbie Currie



RE: Vote NO on Fort Carson's HAMET proposal

daniel currie <dcurrie911@hotmail.com>

Wed, Oct 8, 2014 at 9:40 PM

To: "RG_Comments, BLM_CO" <blm_co_rg_comments@blm.gov>

Cc: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, "alcalam@canoncitydailyrecord.com" <alcalam@canoncitydailyrecord.com>, Debbie <dcurrie947@msn.com>, "ryanhoffman@themountainmail.com" <ryanhoffman@themountainmail.com>, "news@koaa.com" <news@koaa.com>, "news@kktv.com" <news@kktv.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>, "usarmy.carson.hqda-ocpa.list.pao-comrel@mail.mil" <usarmy.carson.hqda-ocpa.list.pao-comrel@mail.mil>, "letters@csindy.com" <letters@csindy.com>

Hi Nancy. Thanks again for your help as we struggle to navigate in these unfamiliar waters. I have attached the updated list of concerns and scoping requests for your review. We will continue to send you notes if something else comes to mind.

As we said in the meeting last night my wife and I were disappointed that the BLM policy does not allow for public comment during public hearings. It was nice to hear from both BLM and Army representatives. But CW Kimber's presentation was not surprisingly slanted in the Army's favor. For example the number of landings that he presented were specific to the Tenant activity while the non-Tenant operations which he did not cover could be nearly 100 times greater (per the HAMET proposal). Additionally, we wanted to hear concerns and comments from other civilians in attendance and we wanted them to hear ours.

We were also disappointed that we did not have an opportunity to have an open discussion with representatives of Fort Carson. For example, we were all saddened to hear that approx. 300 non-combat related helicopter crashes have occurred in Afghanistan. But when I asked how many crashes are expected as a result of training in these 'similar conditions' CW Kimber replied that he did not know. If the conditions in Fremont, Park, and Teller counties are so similar to Afghanistan then we should expect a similar number of non-combat related crashes, right? If not then perhaps the conditions are not really that similar so what is the value of the training in these public lands? And while it was nice the Army said they planned to remove the debris as a result of any crashes there were no discussions regarding compensation for potential loss of civilian property or life in the event of a wild fire caused by such a crash. We would have loved to have had those discussions.

But I think we were most disappointed that members of the media like the Canon City Daily Record, Channel 5 News and Channel 11 News did not see a potential military operations increase of 2,000% in this area as note worthy enough to cover. (2,858 reported Non-Tenant operations in 2012 and projected worst case Non-Tenant operations of 61,920 reported in the HAMET proposal). Please let me know if we are wrong here.

Once again we would like to thank you, Kyle, Melissa and Keith at the BLM for your interest and help. Everyone wishes the best for members of the armed forces. But let's be sure that the decisions are in the best interest of everyone, both current and for generations to come.

Dan and Debbie Currie

Date: Wed, 8 Oct 2014 16:45:11 -0600

Subject: Re: Vote NO on Fort Carson's HAMET proposal

From: blm_co_rg_comments@blm.gov

To: dcurrie911@hotmail.com

CC: rgfo_comments@blm.gov; alcalam@canoncitydailyrecord.com; dcurrie947@msn.com

Good Afternoon Dan and Debbie,

Thank you for your comments at the public meeting and here on our comment site.

If I remember you said you would be changing or editing your comment. Would you like to send another email? You certainly can. We will have the map from the public meeting uploaded to our HAMET website tomorrow afternoon. We will not be able to hand out paper maps - sorry about that.

Here is the link to the website where the map will be: <http://www.blm.gov/co/st/en/fo/rgfo/planning/hamet.html>

Thanks, Nancy

On Mon, Oct 6, 2014 at 2:18 PM, daniel currie <dcurrie911@hotmail.com> wrote:

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Dan and Debbie Currie



HAMET.docx
16K



RG_Comments, BLM_CO <blm_co_rg_comments@blm.gov>

Chopper training

Debbie <dcurrie947@msn.com>

Thu, Oct 2, 2014 at 10:21 AM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>

I am a concerned homeowner in Canon City and request Fort Carson provide a weeks worth of chopper training over Canon City as proposed so we can experience and understand what we are being asked to agree to.



HAMET proposal comment

daniel currie <dcurrie911@hotmail.com>

Sat, Nov 1, 2014 at 11:39 PM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, "nkeohane@blm.gov" <nkeohane@blm.gov>

Cc: Debbie <dcurrie947@msn.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>

Hi Nancy and all.

Thank you for posting the IM 2001-030 Military use on and above Public Lands. As a result of reviewing the document I have a few more comments.

First I challenge the BLM's determination that the appropriate form of permit is Right Of Way. The following definition was taken from attachment 1 of the IM:

RIGHTS-OF-WAY (R/W). R/W are used for the purposes listed in Section 501(a) of the FLPMA. FLPMA, Section 507 specifically addresses rights-of-way for Federal agencies. The

Interior Board of Land Appeals (IBLA) has held that a R/W may not be used for Federal military maneuvers (Department of the Army, 95 IBLA 52, December 1986).

Landings, takeoffs, NOE, and contour flying are certainly defined as Military Maneuvers and therefore must not be considered a Right of Way request.

Secondly, according to the IM the BLM must prepare a Public Affairs Plan for the purpose of informing the public. I request that the BLM publish the PAP.

XI. PUBLIC AFFAIRS:

Military proposals to use public lands may be controversial. A public affairs plan is necessary to inform the public of the

proposal and the process leading to the decision to authorize or reject the proposal.

And finally the IM includes a detailed process for determining the appropriate authorization required. I request that the BLM publish the answers and justifications for each of the considerations listed below. Primarily focusing on public safety as a result of NOE and Contour flights and campers, hunters and hikers which may be endangered by wildfire as a result of a helicopter crash.

B. Determining the appropriate authorization to use:

1. The BLM AO first determines whether the proponent agency and forces proposing to use the public lands are Federal or SNG.

2. Then the AO analyzes the proposed use to determine the type of authorization which would provide the military agency with the authority and control necessary to carry out its activities in a reasonably safe and generally unimpeded manner, while

maintaining as much use by other public land users as is feasible. Considerations should include:

a. Safety considerations for the public and BLM employees.

b. Effects on the environment.

c. Effects on other public land users.

d. Feasibility of reclaiming the lands and the associated costs.

e. Duration of the authorization and whether the use is continuous or intermittent.

f. Such other factors as the AO may deem to be relevant.

Thanks, Dan Currie



Re: HAMET proposal comment

Keohane, Nancy <nkeohane@blm.gov>

Mon, Nov 3, 2014 at 8:05 PM

To: daniel currie <dcurrie911@hotmail.com>

Cc: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, Debbie <dcurrie947@msn.com>, "ja@not1moreacre.net" <ja@not1moreacre.net>

Hi Dan, Thanks again for the comments. We will begin responding to all the comments we received during the scoping period in a scoping report to be issued in about a month. Thanks, Nancy

Nancy Keohane, NEPA Specialist
Colorado Renewable Energy Team
Bureau Land Management
3028 East Main Street
Canon City, CO 81212
719-269-8531 office number
719-458-1308 telework number

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Thanks, Dan Currie



HAMET The non-tenants do not respect Colorado.

Debbie <dcurrie947@msn.com>

Sat, Dec 6, 2014 at 7:57 AM

To: "rgfo_comments@blm.gov" <rgfo_comments@blm.gov>, Dan <dcurrie911@hotmail.com>

Debbie Currie
611 Rockridge Loop
Canon City
dcurrie947@msn.com

How about only allowing Fort Carson choppers the use of public lands? That would be 600 landings as opposed to 61,920 non-tenant landings. The resident complaints are caused by non-tenants.

I called Lori Waters, Fort Carson Public Relations on 6 occasions in 2013 with complaints of low flying and at times hovering helicopters over our home. She returned my calls and stated every time there were no Fort Carson choppers in our area at that time and it had to be choppers from other bases causing the problems and they had no control over them.

In the 2 public meetings that have been held the resident complaints have been echoed the same as ours. The non-tenants do not respect Colorado.