

I thank the council for allowing me to make a presentation as a spokesperson for the Drop Zone Group. The Drop Zone Group is composed of Socorro City and County residents. My name is Greg Miller. I have been a resident of Socorro in the Florida Community for over 10 years. I am a professional environmental consultant with over 20 years of experience in environmental investigations and documentation, including Environmental Assessments and Environmental Impact Statements. I am not a pacifist, nor am I an anti-war activist. I believe in the fundamental mission of the US Armed Forces and have provided professional services to the Department of Energy and Department of Defense through out my career. By way of disclosure, I am a proud New Mexico Tech graduate, and during the four years of my studies for my Ph.D. I had a working relationship with Dr. Van Romero. He was instrumental in my success at the institute.

As one of the founding members of the Drop Zone Group, I am not receiving compensation for my efforts as recognized expert in environmental documentation. Everything I say tonight has been reviewed and approved by the Group.

The Drop Zone Group believes that the negative impacts to Socorro and its residents from the Drop Zone and Special Use Airspace are so overwhelming that the project cannot proceed. We are asking the City of Socorro to carefully consider the facts we are about to present, and the documentation that we will provide to you at the end of the presentation. We are asking that the City Council draft and pass a resolution opposing creation of the Drop Zone and Special Use Airspace. This is not about political viewpoint; this is about maintaining community health, and sustaining rational growth in Socorro and Socorro County.

At the January 7th City Council meeting you heard scores of individuals, and individual reasons, as to why the EMRTC Drop Zone plans are harmful, not well thought out, or incomplete. I am not going to repeat that process. What I am going to do is to present four over-arching issues that are so significant that they alone, individually or collectively, should bring the Drop Zone and Special Use Airspace plans to a screeching halt. The four issues are:

One, The EMRTC Drop Zone Environmental Assessment is so inaccurate that it is a fatally flawed document and it should be withdrawn immediately;

Two, Because of the flaws in the EMRTC Drop Zone EA the document does not meet the intent of NEPA and the project should not proceed without meeting NEPA requirements;

Three, Increased aircraft noise from EMRTC activities will cause significant impacts to human health, quality of life, and our children's education;

and Four, Increased aircraft noise from EMRTC activities will decrease property values in the City of Socorro by tens of millions of dollars, a government taking of private property.

The EA Document is inaccurate to the point of being fatally flawed. You can be inaccurate by misstatement, you can be inaccurate by omission, and you can be inaccurate by clouding the facts. The EMRTC EA does all three, and does it often. I am going to cover a few major problems.

Environmental Assessments need to supply information that is complete and accurate enough to allow independent confirmation of the findings. That is the law. With respect to noise impacts the EA has errors of omission, misstatement, and obfuscation. The EA lists noise levels only at the Drop Zone itself; it provides no quantitative assessment of levels along flight paths to and from the Drop Zone. However, the EA states that “noise impacts will not be significant and certainly will not increase...” with respect to the City of Socorro. The EA does not present data or analysis that can be used to evaluate the accuracy of that statement. Regardless of the affirmations of no noise impact to the City, without a quantitative assessment of impact along the flight routes to and from the Drop Zone, an affirmation of no noise impact to the City is speculation.

Probable noise impacts can be calculated, in fact the EA refers to the military software that is used to generate noise maps, like this one, that define the limits of expected sound levels from moving aircraft at variable altitudes. Detailed tables of noise levels or maps of this type are found in every EA prepared by the Air Force for flight operations, but are absent in the EMRTC EA. You can't calculate over-flight sound levels without knowing the distance between the sound source and sound receptor; this critical bit of data is absent from the EMRTC EA.

Where are the aircraft going to fly? Air Force training flight paths are public information, and are readily available. For example, these are the training flight paths published in the Centerfire Drop Zone EA, and the green lines on this map of training routes shows the aerial refueling tracks, like the one east of the river. This map depicts the area around Socorro. It is about 25 miles by 25 miles in dimension. The blue area is the city of Socorro, the red square and red lines are the proposed Drop Zone and the EMRTC controlled land, respectively. The red circle is the area impacted by very low level flight. The grey arrows represent the Groups interpretation of the two different C-130 flight paths described in the text of the Final EMRTC EA, one found on pg. 14 and one on pg. 23. There are indeed residences and private property along either of these two paths. Quantitative assessment of the amount of noise that flight operations will inflict on private property isn't just a good idea, it's the law.

Under NEPA, “illegal segmentation” can occur when the impact of a large project is broken into small bits to avoid creation of an Environmental Impact Statement. We believe it is illegal segmentation to: ignore or minimize aircraft noise resulting from transit to and from the Drop Zone; to separate the Drop Zone EA from the expected EA for the Special Use Airspace; and to provide no assessment of the impact from “clients” other than the 58th SOW.

Aircraft noise will cause significant impacts to human health, quality of life, and education. Environmental noise causes physical and mental health problems. The current scientific consensus is that when noise levels rise to near the 65 decibel Day-Night average that 12% of the population becomes “highly annoyed”, and the general community attitude is that “Noise is one of the important adverse aspects of the of the community environment.” The community considers noise “significant” at that level. Studies of the positive aspects of rural live indicate that 89-95% of all people surveyed believe that “Rural areas have more peace and quiet than do other areas.”

Socorrans overwhelmingly believe that peace and quiet is not only desirable, but is an expected aspect of their life. If we move towards the 65 decibel Day-Night Average noise level the population will become angrier than they are now, and noise will be viewed as a significant adverse factor by those looking to move here. Air Force Instruction 327061 directs that an Environmental Impact Statement “must be prepared if significant impacts are possible.” The EMRTC Finding of No Significant Impact is not appropriate because all aircraft noise is significant to the Socorro community.

FICAN, the Federal Interagency Committee on Aviation Noise, a project of the Department of Defense, Department of Interior, Department of Transportation, the EPA, NASA, and Housing and Urban Development, published a report in July 2007 on the effect of aircraft noise on student test scores. FICAN found that the number of failing high school students drops by 20%, for a 5% reduction in aircraft noise. All student test scores increase by 7 - 9% with a 5% reduction in noise. We think that it is in this community’s interest to do everything it can to prevent No Child Left Behind test scores from falling double-digits from unnecessary noise. Students do better when it’s quiet.

Aircraft noise will cause reduction in property values. Property devaluation by noise is commonly measured as a percentage of value per decibel of noise increase. GRA Incorporated, a major consultant to the transportation industry, suggests a loss factor of about 1% per decibel for estimation. The EMRTC EA implies that an increase of 7-17 decibel Day-Night Average would not have an impact on Socorro. Using the middle of that range, 12 decibels, and applying it to the city property values of nearly \$182 million dollars, as provided by the Socorro County Assessors office, aircraft noise property loss of \$21,800,000 can be expected. That’s just the tip of the iceberg in the cascade of losses we will suffer if we lose our peace and quiet. The question everyone in this room should be asking is “What is going to happen to me when my property value decreases by 10-20%?” Where is the money going to come from for sound insulation of our schools, hospitals, libraries, and rest homes? What impact will noise have on tourism, growth, and the atmosphere of the community?

Finally, this document contains a huge omission, one that causes the Group to question why this Drop Zone and Special Use Airspace was proposed in the manner that it was. One that overshadows the entire proposal. You have to look no farther than the cover letter to the EA to find intentional deception of the public. The first sentence of the letter states “The New Mexico Institute of Mining and Technology (NMT) Energetic Materials Research and Testing Center (EMRTC) in cooperation with the United States Air Force

58th Special Operations Wing (58th SOW) have prepared a Final Environmental Assessment (FEA)...” That statement is not true. The copy of official correspondence from the Air Force that I have here indicates that the EMRTC EA was not conducted in cooperation with the Air Force, or on behalf of the Air Force.

The first sentence of the second paragraph of the EMRTC cover letter states that “The purpose of the DZ is to provide a DZ training area primarily for the 58th SOW who currently lack adequate access to suitable locations to complete mission essential DZ operations training.” That statement is also not true. The Air Force letter and the Final Centerfire Drop Zone EA indicate the 58th SOW is has been meeting its needs since early 2006, and has no currently identified need for new facilities. The EMRTC proposed Drop Zone is not needed by the 58th SOW. There are no cost savings for the 58th SOW to move their activities to Socorro. The United States Air Force does not need, or want, or support the development of the EMRTC Drop Zone.

The Drop Zone Group has shown the City Council that the Drop Zone and Special Use Airspace proposals and Environmental Assessment documentation are fatally flawed in their execution and transparency. We have shown that the 58th SOW does not need, and did not ask for the Drop Zone. It is my professional experience and expert opinion that the EMRTC EA does not meet the requirements for a Finding of No Significant Impact. We have demonstrated that the data necessary to determine the impact of the Drop Zone and Special Use Airspace on the community has not been provided. Therefore, the Drop Zone Group respectfully requests that the City Council draft and pass a resolution opposing EMRTC’s plans to create a Drop Zone and Special Use Airspace. We thank you for allotting time for this presentation.