

**REPORT ON THE
VALUE AND EFFECTIVENESS OF EMERGENCY ALTERNATIVE ARRANGEMENTS FOR
THE DEPARTMENT OF THE AIR FORCE'S INTERIM BEDDOWN OF THE F-22
FORMAL TRAINING UNIT AT EGLIN AIR FORCE BASE, FLORIDA**

June 17, 2021

I. INTRODUCTION

A. Statement of Purpose

On December 21, 2018, the Department of the Air Force (Air Force) sought Council on Environmental Quality (CEQ) approval of alternative arrangements, pursuant to 40 CFR § 1506.11 for implementing the procedural provisions of the National Environmental Policy Act (NEPA), §§ 42 U.S.C. 4321, *et seq.*, to respond to a pilot manning crisis that presented significant national security implications. The emergency was the Air Force's need to restore training of replacement pilots for the F-22 in northwest Florida by January 31, 2019, and there was insufficient time to prepare an environmental impact statement. The CEQ regulations implementing the procedural provisions of NEPA provide that when such emergency circumstances make it necessary for an agency to take an action without observing the normal procedures set forth in those regulations, the federal agency should consult with CEQ about alternative arrangements for compliance with NEPA. On December 21, 2018, CEQ concluded consultation and approved alternative arrangements pursuant to 40 C.F.R. § 1506.11 for implementing the procedural provisions of NEPA. The Air Force immediately accepted the alternative arrangements, documenting this acceptance in a decision memorandum. On January 11, 2019, the Air Force announced its decision in the Federal Register (Federal Register, Vol. 84, No. 8, p. 103, January 11, 2019) to accept alternative arrangements approved by the CEQ for the Air Force's interim beddown of the F-22 Formal Training Unit at Eglin Air Force Base, Florida.

The Air Force's decision memorandum provides, "At the conclusion of the alternative arrangements and no later than two years from the date of the notice of intent to prepare an EIS, the Air Force will provide a report to CEQ on the use of the alternative arrangements that reviews the value and effectiveness of these arrangements." Now, at the conclusion of the alternative arrangements and approximately two years from the date of the Notice of Intent to prepare an EIS (Federal Register Vol 84, No 58, p. 11289, March 26, 2019), the Air Force has prepared the required report on the use of the alternative arrangements that reviews their value and effectiveness. Additionally as required in the alternative arrangements, the Air Force will provide notice of the report in the Federal Register, local newspapers, including the Northwest Florida Daily News and the Bay Beacon, and online at <https://www.eglin.af.mil/>.

B. Background

The F-22 is the United States' premier fighter aircraft, which is essential to national security. It is a specialized "Fifth-Generation" fighter which introduces a large array of sensors that can detect both air and ground targets and share that data with other U.S. and Allied aircraft. The F-22 possesses a sophisticated sensor suite allowing the pilot to track, identify, shoot and kill air-to-air threats before being detected. Significant advances in cockpit design and sensor fusion improve the pilot's situational awareness. It is also "Low Observable," which makes it a stealth platform that can be extremely difficult to detect. This combination means that F-22 pilots can see the enemy, but cannot be seen. The F-22's characteristics provide a synergistic effect ensuring F-22 lethality against all advanced air threats. The combination of stealth, integrated avionics and supercruise (traveling faster than the speed of sound without using afterburner) drastically shrinks surface-to-air missile engagement envelopes and minimizes enemy

capabilities to track and engage the F-22. The combination of reduced observability and supercruise accentuates the advantage of surprise in a tactical environment. Maintenance of these advantages is vital as the Air Force prepares for conflicts with near-peer nations, and would also be invaluable against others emerging threats.

C. Requirements Summary

Nature of the Emergency: In October 2018, Hurricane Michael displaced the Air Force's only F-22 Formal Training Unit (FTU), which consists of the F-22 aircraft in the 43rd Fighter Squadron and its associated T-38 Talon aircraft, a two-seat twinjet supersonic jet trainer in the 2d Fighter Training Squadron, from its home at Tyndall Air Force Base (AFB), Florida, to Joint Base Langley-Eustis in Virginia. This temporary relocation disrupted the current student pilot full-rate Basic Course. Hurricane Michael's subsequent devastation of Tyndall AFB further aggravated deficiencies in the F-22 pilot production pipeline by rendering many of the FTU's facilities unusable for the foreseeable future. The production of trained and qualified F-22 pilots completely stopped for two months, exacerbating the current pilot shortage that the Air Force is facing. As current F-22 pilots retire or separate from the Service, the Air Force needs to produce the same numbers and more to maintain its combat readiness. The Air Force had an urgent need under these circumstances to restart F-22 FTU full-rate training by not later than January 31, 2019, because all its current F-22 student pilots had been unable to perform the required qualifying flights.

Purpose and Need for Agency Action: The purpose of the proposed action was to enable the Air Force to quickly get back to full-rate Basic Course Student, Transition, and

Instructor Pilot production to mitigate potentially severe adverse impacts to the Nation's military readiness. The need for the proposed action was to enable the Air Force to avoid further delay to restarting F-22 FTU operations or achieving full F-22 pilot production capacity that will have negative impacts to the entire F-22 operational force, the United States' sole fully-operational 5th Generation fighter. Delays to restarting F-22 FTU operations had the potential to create a bottleneck in fighter pilot production, generate a backlog of undergraduate pilot training graduates, and exacerbate the fighter pilot manning crisis.

D. Procedural Summary

Proposed Action and Alternatives: The proposed action was to restore training of replacement pilots for the F-22 FTU by January 31, 2019 at Eglin AFB, Florida until the Air Force decides on and implements a permanent beddown. While Hurricane Michael rendered many of the facilities used by the F-22 FTU inoperable, and total recovery was estimated to take between three and five years, two very important facilities for the F-22 FTU at Tyndall AFB survived Michael's destruction: the Special Access Program (SAP) flight simulators and the low observable coatings maintenance facility.

These two facilities at Tyndall AFB are approximately 89 miles away from Eglin AFB. The survival of the simulators and low observable maintenance facilities, coupled with other factors such as the substantial instructor and maintenance workforce made up of contractors, civilian employees, and Air Force Reserve and Guard personnel who were unable or unwilling to relocate, in part because they needed to attend to the repair of their own homes, made nearby Eglin AFB the only near-term alternative to quickly reestablish and resume the F-22 pilot production pipeline. Further, the Air Force Reserve and Guard personnel make up twenty-five percent of the F-22 FTU's instructor pilots. Nearby Eglin AFB's main airfield (Eglin Main) had

existing ramp and operating capacity for the F-22 FTU. Relocating the F-22 FTU to Eglin AFB enabled the F-22 FTU to use the same Special Use Airspace in the Gulf of Mexico that it is accustomed to training in and access to its Air Force Reserve/Guard, civilian, and contractor personnel in the region.

Affected Environment: There are 52,000 annual operations at Eglin Main. Projected annual operations for the FTU's F-22s and associated T-38s could reach 31,000. Interim basing of the F-22 FTU at Eglin AFB would therefore potentially result in a 45% increase to Eglin Main's 52,000 annual operations, including a potential nineteen-percent increase in nighttime operations.

The FTU's F-22 closed-pattern and departure operations of up to 22,000 and 4,000 annual operations, respectively, were the primary cause of projected noise increases at and around Eglin Main. Tyndall AFB was not be available as a Precision Instrument Approach Field for any closed-pattern operations until the Air Traffic Control Tower, the Radar Approach Control system, and navigational aids are restored. The Air Force's best estimate is that these functions will not be fully restored at Tyndall AFB before July 2019. Therefore, Tyndall AFB would not be available as a potential operational mitigation for noise from F-22 closed-pattern and approach operations until that time. The final suite of mitigation measures for the interim basing of the F-22 FTU at Eglin AFB accounted for other relevant non-FTU aircraft operations.

E. Environmental Impact Assessment and Alternative Arrangements

The Air Force accepted the alternative arrangements prescribed below, as approved by CEQ's letter of December 21, 2018, for the interim beddown of the F-22 FTU at Eglin AFB.

Environmental Assessment: In accordance with the alternative arrangements, the Air Force immediately prepared a special environmental assessment (EA) of the interim beddown. The Air Force met its goal to complete the draft EA by February 28, 2019, and issued the draft EA for public review and comment for 30 days. The draft EA identified proposed mitigation measures addressing any significant impacts identified in the analysis of the draft EA. The Air Force completed the final EA and issued a Record of Decision on April 25, 2019. The Record of Decision set forth the practicable mitigation measures that the Air Force implemented for the interim beddown in accordance with 40 CFR 1505.2 and 1505.3.

Public Participation Measures: The USAF published a Decision Memorandum in the *Northwest Florida Daily News* on January 2, 2019, the *Bay Beacon* on January 9, 2019, and the *Federal Register* on January 11, 2019 (84 Fed. Reg. 103, January 11, 2019); and a Notice of Intent to prepare a Special EA in the *Northwest Florida Daily News* on January 14, 2019. Additionally, the USAF mailed notification letters on January 10, 2019, to the interested parties listed in Appendix A of the 2014 SEIS. Finally, in accordance with the CEQ letter dated December 21, 2018, the USAF notified the representatives of the counties and municipalities of Walton, Okaloosa, and Santa Rosa Counties of the reconstitution and reconvening of the Noise Committee on January 9, 2019. As stated in the Notice of Intent and notification letters, the USAF sought public input and help in identifying issues to be addressed in the interim beddown Special EA by not later than January 31, 2019, including any input on its offer to hold a meeting with USAF and CEQ representatives to discuss the alternative arrangements for the F-22 FTU interim beddown.

The Air Force released the draft EA for public review and comment for 30 days on or about February 28, 2019. The Air Force provided CEQ with copies of any notices made in

accordance with these alternative arrangements and post notices online at <https://www.eglin.af.mil/>.

Noise Committee. The Air Force reconstituted and reconvened the Eglin AFB Noise Committee with representatives of the counties and municipalities of Walton, Okaloosa, and Santa Rosa Counties. The Air Force used the Noise Committee to gather information for the development of the environmental assessment and environmental impact statement.

Environmental Impact Statement: In addition to the EA for the interim beddown the Air Force also agreed to prepare an EIS for the permanent beddown of the F-22 FTU. The Air Force issued a Notice of Intent to prepare an EIS on March 26, 2019 (Fed. Reg. Vol 84, No 58, p 11289). The Air Force developed a timeline for the NEPA process, including all milestones and authorization processes, and submitted the timeline to CEQ for its review and approval. To ensure that NEPA compliance proceeded as expeditiously as possible, and consistent with Executive Order 13807 on Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure, the Air Force developed a permitting timetable that identified milestones for this environmental review and authorization process. The Air Force provided its timetable to CEQ within one month of the date of CEQ's letter and updated the timetable monthly to ensure that the environmental review process was completed as expeditiously as is practicable, with a goal of completion of a Record of Decision approximately 2 years (or less) from the date of the Notice of Intent to prepare an EIS. The Air Force signed its Record of Decision on March 24, 2021.

Public Participation Measures: A Notice of Intent (NOI) to prepare an EIS was published in the *Federal Register* on March 26, 2019 (Fed. Reg. Vol 84, No 58, p 11289). The publication of the NOI served as the official starting date for the scoping period. The scoping

process enabled public involvement early in the assessment process, soliciting input from the public and interested agencies on the nature and extent of issues and impacts to be addressed and the methods by which potential impacts are evaluated. The NOI provided a summary of the proposed action and the alternatives and invited all interested stakeholders to attend any of the public scoping meetings being held to provide additional information about this proposal. The NOI also listed an Air Force point of contact for submitting comments or obtaining more information. The Air Force published newspaper advertisements in the *Bay Beacon* (Niceville, FL), the *Northwest Florida Daily News* (Fort Walton Beach, FL), the *Panama City News Herald* (Panama City, FL), and the *Daily Press* (Newport News, VA) announcing the intent to prepare an EIS and hold public scoping meetings in the weeks preceding each of the scheduled public scoping meetings.

Concurrent with the NOI publication, the Air Force mailed notification letters similar to the NOI to elected officials (Congressional, state, and local); Federal, state, and local government agencies; and non-governmental organizations with any potential interest in the project or with jurisdiction over areas potentially affected by the project. The notification letters informed the agencies, organizations, and interested members of the public about the project and encouraged them to visit the Fifth-Generation FTU Optimization website and attend the public scoping meetings.

In May 2019, the Air Force held four public scoping meetings that took place near each installation in facilities compliant with the Americans with Disabilities Act. The meetings were all conducted in the evening from 5:00 to 8:00 PM on May 14-16, 2019 in Valparaiso, Niceville, and Panama City, Florida, respectively, and in Hampton, Virginia on May 22, 2019. All four

public scoping meetings started with an open house, where several posters were displayed, and Air Force personnel were on hand to provide information and answer questions. Air Force representatives followed the informal open house with a formal scripted PowerPoint presentation. The PowerPoint presentation provided an overview of the EIS process, the need for the project, and the Proposed Action and alternatives. A handout was also provided to meeting participants that explained the NEPA process and how the public could be involved. For convenience, a blank comment form was available for meeting participants to provide written comments.

On October 16, 2020, a formal Notice of Availability (NOA) was published in the *Federal Register* by the U.S. Environmental Protection Agency (USEPA) announcing that the Draft EIS was available for review (Fed. Reg. Vol. 85, No. 201 p 65800). The Air Force also published newspaper advertisements in the *Bay Beacon* (Niceville, FL), the *Northwest Florida Daily News* (Fort Walton Beach, FL), the *Panama City News Herald* (Panama City, FL), and the *Daily Press* (Newport News, VA). The advertisements ran on two separate days in each newspaper. The newspaper advertisements announced the availability of the draft EIS at public libraries and on the project website. The advertisements included the date, time, and access instructions for the public hearing. The newspaper advertisements included the project website address, postal mailing address, and a contact phone number to enable members of the public to request a hard copy of the Draft EIS or hearing presentation, and to request accommodation to access the audio portion of the hearing presentation or make a verbal comment for the public hearing. Updates were posted on the project website, and each of the two bases used their media outlets to notify the general public of the Draft EIS public comment period and public hearing through a press release and social media. Notification letters were mailed to those on the mailing

list, including local elected officials, agencies, and members of the public who signed up to be on the mailing list during scoping. Appendix A of the EIS provides a list of individuals on the mailing list, as well as federal, state, and local agencies that were provided notification letters and copies of the Draft EIS.

Publication of the NOA initiated the 45-day public comment period, during which time the public hearing was held. Based on multiple considerations related to the COVID-19 pandemic, the Air Force made the decision to shift the format of the public hearing from in-person and in a physical meeting space to a “virtual” format. The virtual public hearing was held on November 16, 2020 from 6:00-9:00 PM Eastern Time. The hearing was held through an online platform (<https://ems8.intellor.com/login/833662>) and toll-free telephone number (888-251-2949 or 215-861-0694; Access Code: 4341646#). During the public hearing, the Air Force presented details about the proposed actions and the NEPA process and provided attendees an opportunity to provide oral comments. A verbatim transcript from the public hearing was included in Appendix A of the Final EIS. In addition to receiving oral comments at the hearing, the Air Force also accepted written comments from the public and agencies through U.S. mail and the project website. Consistent with 40 CFR 1503.4, all substantive comments received during the public comment period were fully considered and addressed in the Final EIS, as appropriate.

On February 5, 2021 a formal Notice of Availability (NOA) was published in the *Federal Register* by the U.S. Environmental Protection Agency (USEPA) announcing that the Final EIS was available for review (Fed. Reg. Vol. 86, No. 23, p 8356).

Other Measures. The Air Force provided monthly updates to CEQ discussing the status of the NEPA process. The Air Force has concluded alternative arrangements and approximately

2 years from the date of the Notice of Intent to prepare an EIS, the Air Force is now providing a report to CEQ on the use of the alternative arrangements that reviews the value and effectiveness of these arrangements. The Air Force is also providing notice of the report in the Federal Register, local newspapers, including those specified above, and online at <https://www.eglin.af.mil/>.

II. Assessment of the Value and Effectiveness of the Alternative Arrangements

A. Value

1. Training Benefits: The application of the alternative arrangements enabled the Air Force to fully restore its F-22 FTU training with limited impacts.

2. Timeline: The Alternative Arrangements enabled the Air Force to come into full compliance with NEPA procedural requirements while fully restoring its F-22 FTU training mission by January 31, 2019. The Air Force met its goal to complete the draft EA by February 28, 2019, and issued the draft EA for public review and comment for 30 days. The Air Force completed the final EA and signed a Record of Decision before the April 30, 2019 deadline under the Alternative Arrangements. Training of F-22 replacement pilots continued at a full production rate while the Air Force proceeded to prepare an EIS for the F-22 FTU's permanent beddown.

The Air Force issued a Notice of Intent to prepare an EIS on March 26, 2019 and conducted public scoping meetings in Florida from May 14-16, 2019 and in Virginia on May 22, 2019. Notices of availability of the Draft and Final EIS were published on October 16, 2020 and February 5, 2021, respectively. The Air Force signed the Final EIS ROD on March 24, 2021.

B. Effectiveness

1. Public Participation Measures: All of the public participation measures and associated milestones identified by CEQ under the alternative arrangements were met by the Air Force as stipulated or planned.

2. Effectiveness in Meeting Deadlines for F-22 FTU Interim Beddown EA and Permanent Beddown EIS: The Air Force completed the EA for the interim beddown of the F-22 FTU at Eglin AFB, Florida by February 28, 2019 and issued a ROD by April 30, 2019. In the interim, a Notice of Intent to prepare an EIS for the permanent beddown of the F-22 FTU was issued before April 1, 2019; and notice of availability of the Final EIS was published on February 5, 2021. The Final EIS ROD was signed on March 24, 2021, within approximately two years of the publication of the notice of intent to prepare an EIS on March 26, 2019.

III. CONCLUSION

The alternative arrangements effectively allowed the Air Force to immediately take an action with significant environmental impact, the interim beddown of the F-22 FTU at Eglin AFB that was necessary to control the impacts of its F-22 pilot training emergency. Compliance with NEPA was accomplished by conducting a rapid EA with substantial public participation, including reconstituting and re-convening the Noise Committee with Walton, Okaloosa, and Santa Rosa Counties, while a two-year process to comprehensively analyze the long-term effects on alternative F-22 training program locations was begun and, ultimately, was successfully completed.