



**DEPARTMENT OF THE AIR FORCE**  
**WASHINGTON DC**

**OFFICE OF THE ASSISTANT SECRETARY**

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Mary Neumayr  
Chief of Staff  
Council on Environmental Quality  
Executive Office of the President  
730 Jackson Place  
Washington, DC 20503

Dear Ms. Neumayr,

The U.S. Air Force (Air Force) hereby requests emergency alternative arrangements for compliance with the National Environmental Policy Act (NEPA), in accordance with the Council on Environmental Quality (CEQ) regulation 40 CFR 1506.11, to respond to a pilot manning crisis exacerbated by Hurricane Michael that presents significant national security implications. To restore training of replacement pilots for the F-22 by January 31, 2019, the Air Force proposes to conduct a rapid environmental review with public involvement, mitigation of the significant environmental effects of the selected alternative to the extent practicable, and comprehensive analysis of the long-term effects on alternative F-22 training program locations.

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-22A 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.

### 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 aircraft 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<sup>1</sup> 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. This situation will worsen unless the Air Force can restart F-22 FTU full-rate training by January 2019, because all student pilots are currently unable to perform qualifying flights. 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.

When Hurricane Michael struck Tyndall AFB, the F-22 FTU had 14 Basic Course students, two Track 2 students, and one Track 1 student enrolled in training. Track 2 is for previously qualified F-22 pilots who are no longer current, and Track 1 is for current fighter pilots who have not flown the F-22. The Track 1 student had completed a majority of his training and returned to his operational unit to complete his transition. The two Track 2 students were returned to their gaining operational units without accomplishing any training. The gaining operational units will assume the resource burden and risk to train the one Track 1 and the two Track 2 students. The 14 Basic Course students were approximately 90 days into their 160 day course. On average the students had completed only 8 of the 38 total syllabus flying sorties. The F-22 FTU restarted limited student flying at Eglin AFB on December 6, 2018, after nearly two months of no flying. Flying is limited so that operations would fall within the parameters of an existing Air Force Categorical Exclusion (CATEX).<sup>2</sup> The Air Force will be unable to rely on this CATEX beyond January 31, 2019 due to the necessary increase in flight operations. The delays in F-22 FTU student training will delay the Basic Course pilots arriving at their operational units, negatively impacting unit manning.

The F-22 is a niche fighter community due to the small number of primary mission aircraft inventory (combat-coded aircraft), just 123 total jets. There are less than 250 Regular Air Force F-22 pilots plus an additional 40 full-time Air Reserve Component F-22 pilots actively serving. These numbers include all F-22 student pilots, operational pilots, pilots on staff, and at school. The goal for active component Air Force manning in operational units by June 2019 is 100%. In fiscal year (FY) 2018, the Air Force lost 19 F-22 pilots due to retirement, separation, or promotion to Colonel (O-6). Additionally, only 6 of the 11 F-22 pilots (54%) eligible for the initial pilot bonus in FY18 accepted the bonus, indicating 5 more F-22 pilots will soon leave the

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<sup>1</sup> 442 buildings out of 484 on Tyndall AFB have been assessed (91%). Of those assessed so far, 109 need to be demolished (26%); 129 can be repaired to support the current mission (27%); and 204 are currently undergoing analysis for potential future courses of action (42%).

<sup>2</sup> 32 C.F.R. Part 989, Appendix B (CATEX A2.3.31).

Air Force. The small size of the F-22 community, combined with the number of pilots either lost or uncommitted, demands the continued full-scale production of F-22 Basic Course students.<sup>3</sup>

#### Purpose and Need for Agency Action

Any delay to restarting F-22 FTU operations or achieving full F-22 pilot production capacity will have negative impacts to the entire F-22 operational force, the United States' sole fully operational 5th Generation fighter. The purpose of the proposed action is 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. On average, the F-22 FTU trains 28 Basic Course pilots, 20 Transition Course pilots, and 9 Instructor Pilots each fiscal year. The need for the proposed action is the avoidance of delays in restarting F-22 FTU operations. These delays will create a bottleneck in fighter pilot production, generate a backlog of undergraduate pilot training graduates, and exacerbate the fighter pilot manning crisis.

#### Proposed Action and Alternatives

The proposed action is 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 a permanent beddown location. While Hurricane Michael rendered many of the facilities used by the F-22 FTU inoperable, and total recovery is 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 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 are unable or unwilling to relocate, in part because they need to attend to the repair of their own homes, make 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) has existing ramp and operating capacity for the F-22 FTU. Relocating the F22 FTU to Eglin AFB also enables 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. Joint Base Langley-Eustis has no F-22 FTU instructors and lacks the robust simulators that are available at Tyndall AFB. Moving the SAP simulators at Tyndall AFB to another

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<sup>3</sup> "According to Air Force data for the active component, the Air Force had fewer fighter pilots than authorizations in 11 of 12 years from fiscal year 2006 through fiscal year 2017. This gap grew from 192 fighter pilots (5 percent of authorizations) in fiscal year 2006 to 1,005 (27 percent of authorizations) in fiscal year 2017." GAO-18-113 Military Personnel, Report to the Committee on Armed Services, U.S. Senate, "DOD Needs to Reevaluate Fighter Pilot Workforce Requirements," p. 34 (April 2018). "Fighter pilots operate tactical aircraft that engage in air-to-air and air-to-surface attacks and include the A-10, F-15, F-16, F-22A, and F-35 aircraft." *Id.*, p. 33. As of the conclusion of Fiscal Year 2018, the Air Force was short 1,937 pilots. Further, active duty fighter pilots are among the most stressed communities within the Air Force, with manning at only approximately 80% of total requirements.

location is estimated to take one year and cost \$22 million, and the Air Force cannot accept further delayed or degraded F-22 simulator capacity for training.

The lack of ready access to F-22 simulator capacity, F-22 weapons and tactics trainer cockpits, classified academic space, and F-22 qualified academic/simulator instructors at any location other than Tyndall AFB is the reason no other F-22 base, to include Joint Base Langley-Eustis, is currently a reasonable alternative for the interim beddon of the F-22 FTU compared to Eglin AFB at the current time. The Academic Simulator Building (ASB) at Tyndall AFB serves as the hub for all F-22 FTU instruction—from computer based instruction, academic lessons, 14 weapons and tactics trainer cockpits, and eight full mission simulators. The ASB supports over 68% of the F-22 Basic Course syllabus. Luckily, the ASB received minimal damage from Hurricane Michael and has already been restored to full operational capability. The ASB is the cornerstone to F-22 FTU operations.

#### Affected Environment

Currently 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 Air Force has preliminarily identified noise as the only significant environmental impact from the proposed action under the alternative arrangements. A preliminary noise analysis of adding the F-22 FTU to Eglin AFB revealed potentially significant impacts. The increase in operations from the FTU's aircraft will create a measurable increase in the 65 decibel (dB) Day-Night Average Sound Level (DNL) noise contour on the south, east, and west side of Eglin Main. Additionally, operations from the FTU's aircraft will increase the 65 dB DNL contour to the southwest and northeast which will impact populated areas and other noise sensitive environments including residential homes, schools, churches, recreational facilities, and other community facilities. The DNL noise contour increases suggest that the mission will have the potential to cause significant impacts to the areas to the west and southwest of Eglin Main due to increases of 5 dB in the 65 dB and above DNL noise contours from proposed F-22 operations.

The FTU's F-22 closed-pattern and departure operations<sup>4</sup> of up to 22,000 and 4,000 annual operations, respectively, are the primary cause of projected noise increases at and around Eglin Main. Tyndall AFB will not be available as a Precision Instrument Approach Fields 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 current best estimate is that these functions will not be fully restored at Tyndall AFB before July 2019. Therefore, Tyndall AFB

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<sup>4</sup> Departure operations are take-offs. F-22 students are required to practice multiple take-offs and landings early in the syllabus to demonstrate safe basic aviation competence in the F-22. Closed-patterns are used to maximize student take-off and landing practice via touch-and-goes while minimizing the fuel required to accomplish the training.

will not be available as a potential operational mitigation for noise from F-22 closed-pattern operations until that time. Ultimately, any final suite of mitigation measures for the interim basing of the F-22 FTU at Eglin AFB will have to account for other relevant non-FTU aircraft operations.

#### Environmental Impact Assessment and Alternative Arrangements

The Air Force will prepare an environmental impact statement (EIS) for the permanent beddown for the F-22 FTU, with scoping planned for next year. This EIS will inform the Air Force's selection via its established Strategic Basing Process of a permanent beddown location for the F-22 FTU. The Strategic Basing Process typically involves the identification and Secretarial approval of objective basing criteria, the rank ordering of locations based on application of those criteria from an enterprise of locations, the winnowing of those locations to a small number of candidate bases, identification of preferred and reasonable locations, and the final selection of the basing location. The candidate bases constitute the reasonable alternatives for NEPA purposes, and once identified, allow for the issuance of a NEPA Notice of Intent. The Air Force estimates that it will take approximately three to five years to complete its Strategic Basing Process, publish the Final EIS and record of decision (ROD), and complete any associated construction for the permanent beddown of the F-22 FTU. The Air Force cannot delay F-22 pilot production until these actions are completed without irreparable harm to the National Security Strategy posture. Therefore, in accordance with the provisions of 40 C.F.R. 1506.11, the Air Force initiated consultation with CEQ and requests alternative arrangements for the interim basing of the F-22 FTU at Eglin AFB, Florida.

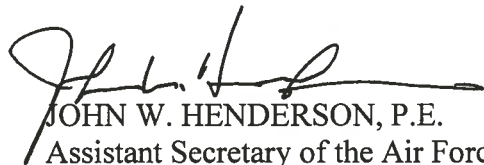
For the requested emergency alternative arrangements, the Air Force proposes to immediately initiate preparation of a concise environmental assessment (EA) for the F-22 FTU interim beddown, tiering off of the Air Force's 2014 Final Supplemental EIS (SEIS) for basing F-35 aircraft at Eglin AFB, for tentative release to affected agencies and the public by February 28, 2019. The EA will analyze the noise and other relevant impacts from the F-22 FTU interim beddown and operations, potential operational mitigations to reduce noise impacts, and any other relevant mitigations. The Air Force will engage relevant federal, state, and local agencies and the affected public during the development of the EA. Further, the EA will be provided to CEQ, the Environmental Protection Agency (EPA), and interested and affected parties, including recipients of the 2014 Final SEIS. Lastly, the EA will confirm that the U.S. Navy F-35s analyzed in the 2014 SEIS will relocate to Naval Air Station Lemoore, California by July 2019. Additionally, a notice of availability will be published in the local newspapers of general circulation. The affected agencies and the public will be afforded a 30-day review and comment period. At the end of the comment period the Air Force will prepare its responses to all substantive comments and will provide a copy of all comments and responses to CEQ and EPA.

Air Force environmental planners know from public involvement and several years of experience implementing the Air Force's ROD selecting the No Action Alternative and associated mitigations for the 2014 SEIS that the surrounding community has been concerned

about noise. The Air Force will use this experience to address anticipated concerns about the temporary relocation of the F-22 FTU.

The Air Force's primary points of contact for this matter are Mr. Les Reed (703-614-8071 or [leslie.h.reed2.civ@mail.mil](mailto:leslie.h.reed2.civ@mail.mil)), or Mr. Jack Bush (703-614-0237 or [jack.c.bush.civ@mail.mil](mailto:jack.c.bush.civ@mail.mil)). Alternate points of contact are Mr. Jerry Kohns (703-614-8612 or [gerald.p.kohns.civ@mail.mil](mailto:gerald.p.kohns.civ@mail.mil)) or Mr. Steve Arenson (571-256-2471 or [steven.l.arenson.civ@mail.mil](mailto:steven.l.arenson.civ@mail.mil)).

Sincerely,



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