

**Final**

**Environmental Impact Statement for  
Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field Air National Guard Base,  
Klamath Falls, Oregon**



**September 2026**

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DEPARTMENT OF THE AIR FORCE  
WASHINGTON DC

OFFICE OF THE ASSISTANT SECRETARY

September 9, 2026

MEMORANDUM FOR WHOM IT MAY CONCERN

FROM: SAF/IE  
1665 Air Force Pentagon  
Washington, DC 20330-1665

SUBJECT: Environmental Impact Statement (EIS) for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base (ANGB), Klamath Falls, Oregon Certification of Page Limits and Deadline

This memorandum certifies that the Department of the Air Force (DAF) has fully considered the factors mandated by the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321, et seq., in the preparation of the Kingsley Field F-35 FTU EIS.

I certify that the analysis within the EIS has been tailored to comply with page limits and deadlines. Under authorized administrative procedures, the DAF requested and was granted an official waiver extending the original congressional EIS timeline by an additional four (4) months.

The EIS represents DAF's good-faith effort to prioritize and document the most important considerations required by NEPA within the congressionally mandated page limits. This prioritization reflects DAF's expert judgment. Considerations addressed briefly or unaddressed were, in DAF's judgment, to be comparatively unimportant or frivolous. The resulting EIS represents DAF's good-faith effort to fulfill NEPA's requirements within the adjusted timeline authorized by the approved waiver, and such effort is substantially complete.

In the DAF's expert opinion, it has thoroughly considered the factors mandated by NEPA. The analysis contained within the EIS is, in DAF's judgment, adequate to inform and reasonably explain the DAF's final decision regarding the proposed action for F-35A FTU basing at Kingsley Field ANGB.

A handwritten signature in black ink, appearing to read "Michael E. Saunders", is located above the typed name.

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MICHAEL E. SAUNDERS, SES, DAF  
Principal Deputy Assistant Secretary of the Air Force  
Energy, Installations & Environment (SAF/IE)

## Cover

### ***FINAL ENVIRONMENTAL IMPACT STATEMENT FOR BASING F-35A LIGHTNING II FORMAL TRAINING UNIT AT KINGSLEY FIELD AIR NATIONAL GUARD BASE KLAMATH FALLS, OREGON***

- a. *Lead and Cooperating Agencies:* United States Department of the Air Force (DAF); and the Federal Aviation Administration (FAA) is a Cooperating Agency.
- b. *Title of Action:* Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base, Klamath Falls, Oregon
- c. *Comments and Inquiries:* Ms. Alicia Treece, NGB/A4FR, 3501 Fetchet Avenue, Joint Base Andrews MD 20762-5157, (240) 612-8531, [NGB.CCA4F.NEPACOMMENTSOrg@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTSOrg@us.af.mil).
- d. *Designation:* Final Environmental Impact Statement (EIS)
- e. *Abstract:* This Final EIS has been prepared in accordance with the National Environmental Policy Act (NEPA) to analyze the proposed beddown, operation, and construction of associated infrastructure for one formal training unit (FTU) squadron of F-35A Lightning II aircraft at Kingsley Field Air National Guard Base at the Crater Lake-Klamath Regional Airport, in Klamath Falls, Oregon. The squadron would consist of up to 24 Primary Aerospace Vehicles Authorized and 2 Backup Aerospace Vehicles Authorized F-35A aircraft to replace 26 F-15C/D aircraft. The No Action Alternative provides the basis for comparing effects in this EIS, despite faster-than-anticipated F-15C/D divestment. The public and agency scoping process resulted in the analysis of the following environmental resources: noise; airspace; air quality; socioeconomics/children's health and safety; land use/noise compatible land use; Department of Transportation Section 4(f); water resources/floodplains/wild and scenic rivers; geological resources/soils/farmlands; cultural resources; safety; hazardous materials/waste; biological resources/coastal resources/wetlands; effects to visual resources; and infrastructure/utilities/natural resources and energy supply/transportation/public transportation.
- f. EIS Identification Number: EISX-007-57-UAF-1756812380.

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## ACRONYMS AND ABBREVIATIONS

|                  |                                                                             |                      |                                                                     |
|------------------|-----------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------|
| °F               | degree Fahrenheit                                                           | ERP                  | Environmental Restoration Program                                   |
| 173 FW           | 173d Fighter Wing                                                           | ESCP                 | Erosion and Sediment Control Plan                                   |
| ACAM             | Air Conformity Applicability Model                                          | FAA                  | Federal Aviation Administration                                     |
| ACDP             | Air Contaminant Discharge Permit                                            | FEMA                 | Federal Emergency Management Agency                                 |
| ACM              | asbestos-containing material                                                | FTU                  | Formal Training Unit                                                |
| ADAIR            | Adversary Air                                                               | FUD                  | Formerly Used Defense                                               |
| AEDT             | Aviation Environmental Design Tool                                          | FY                   | Fiscal Year                                                         |
| AESA             | Active Electronically Scanned Array                                         | GHG                  | greenhouse gas                                                      |
| AFB              | Air Force Base                                                              | HAF/A3               | Headquarters Air Force Operations,<br>Plans and Requirements        |
| AFFF             | Aqueous Film-Forming Foam                                                   | ICRMP                | Integrated Natural Resources<br>Management Plan                     |
| AFI              | Air Force Instruction                                                       | IFR                  | Instrument Flight Rule                                              |
| AFMAN            | Air Force Manual                                                            | IPaC                 | Information for Planning and Consultation                           |
| AGE              | Aerospace Ground Equipment                                                  | LBP                  | lead-based paint                                                    |
| AGL              | Above Ground Level                                                          | L <sub>dnmr</sub>    | Onset-Rate Adjusted Day-Night Average<br>A-weighted Sound Level     |
| ALP              | Airport Layout Plan                                                         | L <sub>eq(8hr)</sub> | 8-hour Equivalent Sound Level                                       |
| ANG              | Air National Guard                                                          | LID                  | Low Impact Development                                              |
| ANGB             | Air National Guard Base                                                     | L <sub>max</sub>     | Maximum Sound Level                                                 |
| AOI              | Area of Interest                                                            | LMT                  | Crater Lake-Klamath Regional Airport                                |
| APE              | Area of Potential Effects                                                   | MACA                 | Mid-air Collision Avoidance                                         |
| APZ              | Accident Potential Zone                                                     | MBTA                 | Migratory Bird Treaty Act                                           |
| ASD              | Average Sortie Duration                                                     | mm                   | millimeter                                                          |
| AST              | aboveground storage tank                                                    | MOA                  | Military Operations Area                                            |
| AT/FP            | Antiterrorism/Force Protection                                              | MSA                  | Munitions Storage Area                                              |
| ATC              | Air Traffic Control                                                         | MSL                  | Mean Sea Level                                                      |
| ATCAA            | Air Traffic Control Assigned Airspace                                       | MTR                  | Military Training Route                                             |
| BAA              | Backup Aerospace Vehicle Authorized                                         | NAAQS                | National Ambient Air Quality Standards                              |
| BASH             | Bird/Wildlife Aircraft Strike Hazard                                        | NEPA                 | National Environmental Policy Act                                   |
| BMP              | Best Management Practice                                                    | NGB                  | National Guard Bureau                                               |
| CAP              | Central Accumulation Point                                                  | NHPA                 | National Historic Preservation Act                                  |
| CDNL             | C-weighted Day-Night Average Sound Level                                    | NIPTS                | Noise-Induced Permanent Threshold Shift                             |
| CERCLA           | Comprehensive Environmental<br>Response, Compensation, and<br>Liability Act | NO <sub>x</sub>      | nitrogen oxides                                                     |
| CFR              | Code of Federal Regulations                                                 | NPDES                | National Pollutant Discharge<br>Elimination System                  |
| CO               | carbon monoxide                                                             | NPS                  | National Park Service                                               |
| CO <sub>2e</sub> | carbon dioxide equivalent                                                   | NRCS                 | Natural Resources Conservation Service                              |
| DAF              | Department of the Air Force                                                 | NRHP                 | National Register of Historic Places                                |
| DAFI             | Department of the Air Force Instruction                                     | O <sub>3</sub>       | ozone                                                               |
| DAFMAN           | Department of the Air Force Manual                                          | ODFW                 | Oregon Department of Fish and Wildlife                              |
| dB               | decibel                                                                     | OWS                  | oil/water separator                                                 |
| dBc              | C-weighted decibel                                                          | PA                   | Probability of Awakening                                            |
| DEQ              | Department of Environmental Quality                                         | PAA                  | Primary Aerospace Vehicle Authorized                                |
| DERP             | Defense Environmental Restoration Program                                   | PCB                  | polychlorinated biphenyl                                            |
| DESR             | Defense Explosives Safety Regulation                                        | PDARS                | Performance Data Analysis and<br>Reporting System                   |
| DNL              | Day-Night Average Sound Level                                               | PFAS                 | per- and polyfluoroalkyl substances                                 |
| DNWG             | Department of Defense Noise<br>Working Group                                | PFOA                 | perfluorooctanoic acid                                              |
| DoD              | Department of Defense                                                       | PFOS                 | perfluorooctanesulfonic acid                                        |
| DoW              | Department of War                                                           | PHL                  | Potential for Hearing Loss                                          |
| EA               | Environmental Assessment                                                    | PM <sub>2.5</sub>    | particulate matter less than or equal<br>to 2.5 microns in diameter |
| EIS              | Environmental Impact Statement                                              |                      |                                                                     |
| EO               | Executive Order                                                             |                      |                                                                     |
| EPA              | United States Environmental Protection Agency                               |                      |                                                                     |

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|                  |                                                                    |                 |                                         |
|------------------|--------------------------------------------------------------------|-----------------|-----------------------------------------|
| PM <sub>10</sub> | particulate matter less than or equal<br>to 10 microns in diameter | SI              | Site Inspection                         |
| POI              | Point of Interest                                                  | SO <sub>2</sub> | sulfur dioxide                          |
| POL              | petroleum, oil, and lubricant                                      | STP             | shovel test pit                         |
| PRL              | Potential Release Location                                         | SWPPP           | Storm Water Pollution Prevention Plan   |
| psf              | pounds per square foot                                             | TAF             | Terminal Area Forecast                  |
| QD               | quantity-distance                                                  | U.S.            | United States                           |
| R-               | Restricted Area                                                    | UFC             | Unified Facilities Criteria             |
| RAP              | Ready Aircrew Program                                              | USACE           | United States Army Corps of Engineers   |
| ROD              | Record of Decision                                                 | USC             | United States Code                      |
| ROI              | Region of Influence                                                | USCB            | United States Census Bureau             |
| RPZ              | Runway Protection Zone                                             | USFS            | United States Forest Service            |
| SAP              | Satellite Accumulation Point                                       | USFWS           | United States Fish and Wildlife Service |
| SEL              | Sound Exposure Level                                               | UST             | underground storage tank                |
| SF               | square foot/feet                                                   | VFR             | Visual Flight Rules                     |
| SHPO             | State Historic Preservation Office                                 | VOC             | volatile organic compound               |
|                  |                                                                    | W-              | Warning Area                            |

## **1.0 PURPOSE AND NEED FOR ACTION**

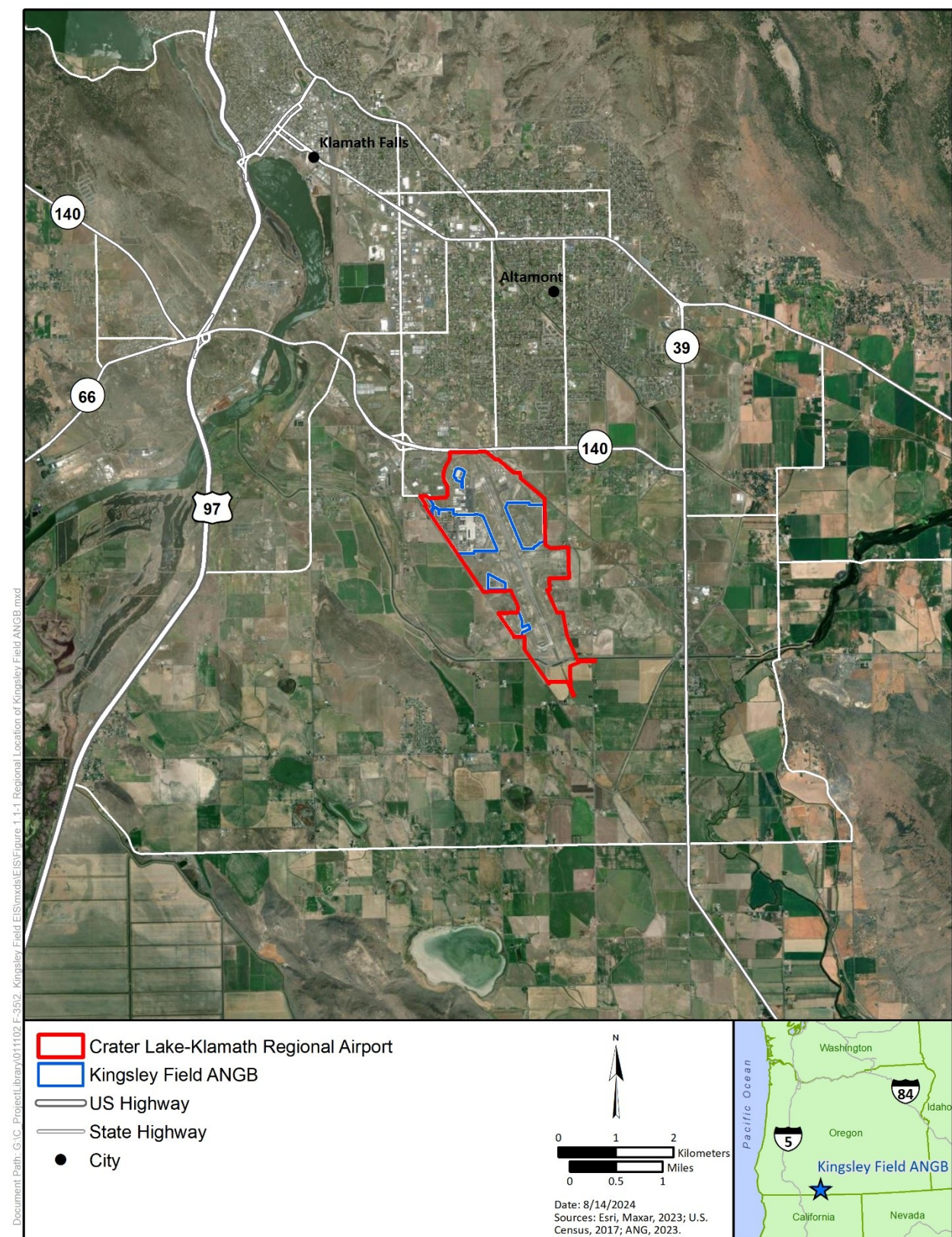
### **1.1 INTRODUCTION**

The United States (U.S.) Department of the Air Force (DAF) proposes to maintain the combat capability of the Air National Guard (ANG) fighter wings operating the F-15C/D aircraft. These aircraft have reached the end of their service life and will be phased out due to maintenance concerns and availability of aircraft parts. The proposal is the beddown, operation, and associated infrastructure construction of one formal training unit (FTU) squadron of F-35A Lightning II (F-35A) aircraft at Kingsley Field Air National Guard Base (ANGB) at the Crater Lake-Klamath Regional Airport (LMT), in Klamath Falls, Oregon. The squadron would consist of up to 24 F-35A Primary Aerospace Vehicles Authorized (PAA) and 2 Backup Aerospace Vehicles Authorized (BAA) that would replace 26 F-15C/D aircraft. PAA is the number of aircraft authorized to a unit in order to perform its operational mission, while BAA is the aircraft that would be used only if one of the PAA aircraft is out of commission.

LMT is in south-central Oregon, approximately 5 miles south of downtown Klamath Falls in Klamath County, and about 15 miles north of the Oregon-California border (Figure 1.1-1). Owned and operated by the City of Klamath Falls, LMT is categorized as a nonprimary commercial service airport within the current National Plan of Integrated Airport Systems. The airport spans 1,251 acres and features two runways, Runway 14/32 and Runway 08/26. It hosts aviation-related businesses and facilities, including General Aviation and Specialized Aviation Service Organizations, the Oregon ANG, the U.S. Forest Service (USFS), and an Air Traffic Control Tower that is an FAA contract tower operated by the Oregon ANG with military and civilian controllers. Kingsley Field ANGB occupies 254 acres leased by the Oregon ANG from the City of Klamath Falls, in the western part of LMT (Figure 1.1-1). Its strategic location, roughly midway between Portland, Oregon and San Francisco, California makes it a vital connection for military bases along the West Coast.

Considering this location information, the region of influence (ROI) associated with the affected environment in this EIS includes the geographic areas surrounding LMT/Kingsley Field ANGB that may be affected by the Proposed Action. These areas include:

- Areas under the flight paths where civil and military aircraft operate during takeoff and landing or other flight operations.
- Zones where land use compatibility is evaluated in relation to all civil and military aircraft operations.
- Areas identified for safety considerations, including those impacted by potential aviation accidents or incidents.
- Areas where aircraft noise affect residential or other noise sensitive land uses and commercial land uses, as depicted on noise contour maps showing the varying levels of aviation noise exposure.



**Figure 1.1-1 Regional Location of Kingsley Field ANGB**

The 173d Fighter Wing (173 FW) is co-located with the Oregon ANG at Kingsley Field ANGB and uses the civil airfield for military aircraft training. The 173 FW's mission is to produce the best air-to-air combat pilots, intelligence specialists, and healthcare professionals and serve the state of Oregon and the nation in times of peace and war.

## **1.2 PURPOSE OF ACTION**

The purpose of the Proposed Action is to expand FTU capacity by providing an integrated F-35A training environment that supports full-spectrum pilot qualification in accordance with the DAF F-35A training syllabus. Expanding this capacity supports pilot production requirements and helps align pilot production with aircraft fielding in support of the 2026 National Defense Strategy (Department of War [DoW] 2026).

## **1.3 NEED FOR ACTION**

The F-15C/D fleet is reaching the end of its service life. The DAF evaluates fleet service life based on aircraft structural integrity, capability, sustainment feasibility, and long-term affordability. As aircraft age, maintenance demands increase and parts availability declines, reducing readiness and increasing sustainment burden. The DAF has determined it is not optimal to retain the F-15C/D aircraft beyond FY 2030 and advised Congress of the same; some active duty installations have already begun retiring their F-15C/D fleets.

Transitioning to the F-35A would maintain mission capability and enhance defense capabilities through next-generation technologies, including advanced sensors and radar and modern electronic warfare systems. In addition, DAF F-35A pilot production requires additional FTU capacity beyond that provided at Pilot Training Centers 1 and 2 at Eglin and Luke Air Force Bases (AFBs), respectively. As a DAF FTU, the 173 FW would provide additional training capacity needed to meet current and projected F-35A pilot production requirements.

Since the DAF Proposed Action involves construction of infrastructure necessary to support the military mission at LMT/Kingsley Field ANGB, the City of Klamath Falls (Airport Owner/Operator) will need to submit an updated Airport Layout Plan (ALP) to the Federal Aviation Administration (FAA) for certain changes to their ALP. When an Airport Owner/Operator requests approval for changes to their ALP, the FAA is required to review the ALP, and if appropriate, approve the updated ALP pursuant to 49 United States Code (USC) section 47107(a)(16) et seq., and Section 743 of the FAA Reauthorization Act of 2024. Thus, FAA's federal action will be the approval of changes to the City of Klamath Falls ALP depicting the DAF proposed infrastructure projects subject to FAA review pursuant to 49 USC section 47107(a)(16) et seq., and the FAA Reauthorization Act of 2024. The purpose and need of FAA's action is to evaluate the City of Klamath Falls ALP update request for proposals that: materially impact the safe and efficient operation of aircraft at, to, or from the civil airport; would adversely affect the safety of people or property on the ground adjacent to the airport; and would adversely affect the value of prior federal investments to a significant extent. FAA responsibilities under 49 USC section 47101 et seq. and the FAA Reauthorization Act of 2024 establish the framework of the purpose and need for FAA's action.



#### **1.4 INTERAGENCY INVOLVEMENT**

The DAF is the lead agency responsible for the scope and content of this Environmental Impact Statement (EIS). The National Guard Bureau (NGB) is the environmental planning function executing this action. Pursuant to 42 USC 4336a(a)(3) and 42 USC 4336e (2), the FAA is a Cooperating Agency because the scope of the Proposed Action involves activities within their jurisdiction by law and special expertise.

The FAA is serving as a cooperating agency for this EIS pursuant to 42 USC 4336a(a)(3) and 42 USC 4336e(2) (see Appendix B for a copy of the Cooperating Agency letter). The FAA has jurisdiction by law and special expertise relating to the DAF proposal at LMT. FAA’s authorities and special expertise are based on its statutory responsibilities under the Airport and Airway Improvement Act of 1982 (49 USC section 47101 et seq.), Section 743 of the FAA Reauthorization Act of 2024 (Public Law 118-254), and relevant implementing regulations. The FAA is also responsible for providing leadership in planning and developing a safe and efficient national airport system and satisfying the needs of aviation interests of the U.S., with due consideration for economics, the environment, local property rights, and safeguarding the public investment. This includes oversight and administration of airport planning and development, airport noise compatibility planning, safety of airport operations, protection of airspace on and immediately adjacent to an airport, and environmental reviews of airport improvement projects. The FAA Office of Airports is the lead within the FAA for the development of this EIS and coordinated internally to address all resources of concern under FAA’s jurisdiction to ensure the environmental review under the National Environmental Policy Act (NEPA) and other regulatory processes are completed in a timely manner. If FAA receives a request from the City of Klamath Falls for approval of certain changes to the ALP for LMT, FAA would be responsible for an environmental review under NEPA and may rely on the information and analyses in the Final EIS for its decision-making purposes. The FAA role as a Cooperating Agency in this environmental review neither expands nor diminishes its final decision-making authority.

As such, this EIS assesses the potential environmental, social, economic, historic, and cultural effects of the Proposed Action and No Action Alternative in order to meet each agency’s distinct obligations to support its decision-making; the document was prepared in accordance with NEPA of 1969 as amended (42 USC 4321 et seq.), the DoW NEPA Implementing Procedures (2026), DAF NEPA Implementing Procedures (2026), and, as applicable, FAA Order 1050.1G, FAA National Environmental Policy Act Implementing Procedures.

The EIS lists all federal permits, licenses, and other authorizations that must be obtained in implementing the proposal. Table 1.4-1 presents a summary of these requirements as applicable to this Proposed Action.

**Table 1.4-1 Summary of Applicable Federal Permits, Licenses, and Consultations**

| <i>Specific Action</i>                                   | <i>Agency</i> | <i>Status</i>                                                                                                                                                                                                                             |
|----------------------------------------------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ESA Section 7, consultation for federally listed species | USFWS         | Informal consultation complete. USFWS concurred with the determination that the Project may affect, but is not likely to adversely affect federally listed species and designated critical habitat. Formal consultation was not required. |

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| <i><b>Specific Action</b></i>                          | <i><b>Agency</b></i> | <i><b>Status</b></i>                                                                                                                                                                                                                                                          |
|--------------------------------------------------------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NHPA, Section 106                                      | SHPOs                | Consultation is complete with the SHPOs of Oregon, California, Idaho, and Nevada. An Adverse Effect to the Kingsley Field Alert Hangar Historic District was resolved through a Memorandum of Agreement with the Oregon SHPO. All consultations are documented in Appendix B. |
| CWA (33 USC 1344 et seq.) and implementing regulations | Oregon DEQ           | Coverage under a construction stormwater general permit would be required for ground-disturbing activities exceeding 1 acre. An Erosion and Sediment Control Plan would be prepared consistent with permit requirements. No jurisdictional waters would be impacted.          |

*Note:* Table to be further developed during the Environmental Impact Analysis Process.

*Legend:* CWA = Clean Water Act; DEQ = Department of Environmental Quality; ESA = Endangered Species Act; NHPA = National Historic Preservation Act; SHPO = State Historic Preservation Office; USC = United States Code; USFWS = United States Fish and Wildlife Service.

## **2.0 ALTERNATIVES INCLUDING THE PROPOSED ACTION**

### **2.1 PROPOSED ACTION ALTERNATIVE**

#### **2.1.1 Overview of the Proposed Action**

The proposal is the beddown, operation, and associated infrastructure construction of one FTU squadron of F-35A aircraft at the 173 FW. The F-35A aircraft would replace the aging F-15C/D formerly operated by the 173 FW. Pilots operating the aircraft would conduct training from LMT/Kingsley Field ANGB and in existing military training airspace utilized by the 173 FW. Training operations would take place within existing military training airspace and military training ranges; however, there would likely be an increase in military training airspace operations, described in more detail in Section 2.1.2.2, *Military Training Airspace*. The Proposed Action also includes the addition of approximately 30 personnel.

#### **2.1.2 Elements of the Proposed Action**

##### **2.1.2.1 Elements Affecting the Installation**

###### *Basing the F-35A*

The beddown process would occur in phases associated with the manufacture and delivery of the F-35A aircraft. Delivery of the first aircraft to Kingsley Field ANGB could occur in FY 2027. Delivery of the final aircraft would be expected in FY 2029, at which time the full complement of up to 24 PAA (plus 2 BAA) F-35A aircraft would be based at Kingsley Field ANGB.

###### *Airfield Operations*

To provide the training needed to ensure combat readiness, F-35A aircrews would conduct operations in two types of areas: (1) an airfield associated with a base, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A would use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures.

The annual flying program for the F-35A is 250 hours per aircraft. Though each aircraft may not achieve the full amount of annual flying hours, this analysis will evaluate the full 250 hours per aircraft. Thus, with up to 24 PAA proposed for the F-35A, the total flying hour program for the 173 FW would be 6,000 hours annually. The number of sorties flown by the 173 FW depends on the training mission and the average sortie duration (ASD), which is influenced by the unit's proximity to its military training airspace (Table 2.1-1).

**Table 2.1-1 Existing Conditions (2023) and Proposed Annual Sorties and Duration**

| <i>Aircraft Type</i>                 | <i>Existing Average Sortie Duration (hours)</i> | <i>Total Aircraft Sorties</i> |
|--------------------------------------|-------------------------------------------------|-------------------------------|
| F-15C/D (Existing Conditions [2023]) | 1.3                                             | 3,360                         |
| F-35A (Proposed Action)              | 1.3                                             | 4,615                         |

*Note:* "Existing Conditions (2023)" reflects the modeled 2023 reference point used for analysis and alternatives comparison; it does not represent current-day fighter operations at LMT/Kingsley Field ANGB.

A sortie consists of a single military aircraft flight from a takeoff through a landing.



A closed pattern is a takeoff from an airfield, followed by a flight pattern that sets the aircraft up for an immediate landing at the same airfield, without intent to ever leave the local area. These include closed patterns under visual flight rules (VFR) and instrument flight rules (IFR) dependent on the fighter wing base and their inclusion in the analysis accounts for local training variations above the fighter wing's operations based on sorties alone. The number of closed patterns per sortie flown with F-15C/D aircraft under Existing Conditions (2023) at the 173 FW was used to predict the proposed F-35A closed patterns.

The LMT/Kingsley Field ANGB supports a considerable number of military airfield operations; Table 2.1-2 compares Existing Conditions (2023) F-15C/D airfield operations with proposed F-35A airfield operations. F-35A airfield operations are based on a 100 percent manned wing with assigned pilots maintaining basic mission capable status as required by the DAF Ready Aircrew Program (RAP). The Existing Conditions (2023) operations provide a benchmark for assessing the proposed F-35A activities, based on historical noise studies, airfield management logs, and previous environmental documentation (NGB 2024a). The proposed F-35A beddown would not alter the number or type of other aircraft at LMT. However, civil aircraft operations are projected to increase by approximately 8 percent from Existing Conditions (2023), according to the 2023 FAA Terminal Area Forecast (TAF) data.

**Table 2.1-2 Existing Conditions (2023) and Proposed Annual Airfield Operations**

| <i>Aircraft Type</i>       | <i>Total Existing Conditions (2023)<br/>Aircraft Operations</i> | <i>Total Proposed Aircraft<br/>Operations</i> |
|----------------------------|-----------------------------------------------------------------|-----------------------------------------------|
| F-15C/D                    | 13,440                                                          | 0                                             |
| F-35A                      | 0                                                               | 20,780                                        |
| Contract ADAIR             | 1,760                                                           | 1,760                                         |
| Civil <sup>1</sup>         | 24,197                                                          | 26,102                                        |
| Transient                  | 1,638                                                           | 1,638                                         |
| Total Airfield Operations  | 41,035                                                          | 50,280                                        |
| Percent Change at Airfield | N/A                                                             | +22.5%                                        |

*Notes:* <sup>1</sup>Civil operations represent the combined annual runway operations of Air Carrier, Air Transport, and General Aviation.

*Legend:* ADAIR = Adversary Air; N/A = Not Applicable.

*Source:* FAA 2023.

All F-35A units have pilot proficiency requirements defined by Headquarters Air Force Operations, Plans and Requirements (HAF/A3) and published in the F-35A RAP (Air Force Manual 11-2F-35A, Volume 1, October 13, 2022). As is the case with Existing Conditions (2023) F-15C/D aircraft operations, F-35A training missions require flying during daylight and dark conditions, as well as under myriad weather conditions. FTU pilots have annual requirements for accomplishing “after dark” training in order to ensure viability in combat. For flight training purposes, “after dark” is considered to be the time period from 1 hour after sunset to 1 hour before sunrise. The time of day flown in the dark varies between the units because of their geographic location and also varies seasonally.

#### *Construction, Renovation, and Demolition*

To accommodate the proposed F-35A beddown, construction of new facilities, renovation of existing facilities, and selective demolition would be required. All new mission-support facilities and utility/infrastructure improvements under ANG control that are necessary to support the F-35A beddown would occur within the Kingsley Field ANGB leased property (leasehold). Two airfield

pavement projects would occur outside the ANG leasehold but within the overall LMT airfield boundary: (1) Repair Taxiway A Access Ramp to Building 400; and (2) construction of a C-17 parking ramp on the east side of the airfield to support C-17 movement for the Oregon Cascadia Zone. These two projects do not expand the ANG leasehold and would be implemented within the existing LMT airfield in coordination with the airport sponsor and FAA, as applicable. Examples of mission-support facilities and infrastructure within the leasehold include squadron operations/maintenance facilities, hangars, simulator facilities, installation communications infrastructure, electrical system upgrades, and other base support facilities (e.g., an engine repair shop and aircraft parking aprons).

Much of the proposed construction and renovation would occur before the first new aircraft arrive but would continue after the first aircraft arrives. The duration of construction is dependent upon the complexity and breadth of development needed to support the beddown.

Tables 2.1-3 and 2.1-4 summarize the proposed demolition, construction, and renovation projects for the Proposed Action and No Action Alternative. As shown in Table 2.1-4, preferred locations for each construction project at LMT/Kingsley Field ANGB have been identified, along with alternative locations for some projects, should the preferred locations become unfeasible as facility designs evolve. The construction projects associated with the No Action Alternative would support continued base operations, ensuring the functionality of the base regardless of which aircraft is based. The location of the proposed construction and renovation projects are shown in Figure 2.1-1, and the location of the proposed demolition projects are shown in Figure 2.1-2. For a more detailed footprint map of individual construction projects, see Appendix A.

**Table 2.1-3 Proposed Demolition Projects**

| <i>Building Number</i>          | <i>Total Area of Demolition (SF)</i> | <i>Year Building was Constructed</i> | <i>Year Proposed for Demolition</i> |
|---------------------------------|--------------------------------------|--------------------------------------|-------------------------------------|
| B209                            | 8,717                                | 1989                                 | 2030                                |
| B213                            | 15,271                               | 1959                                 | 2030                                |
| B215                            | 2,400                                | 1959                                 | 2030                                |
| B219                            | 83,305                               | 1959                                 | 2026                                |
| B230                            | 2,926                                | 1959                                 | 2026                                |
| B231                            | 2,916                                | 1958                                 | 2026                                |
| B242                            | 2,830                                | 1961                                 | 2026                                |
| B243                            | 32,570                               | 1987                                 | 2030                                |
| B334                            | 3,772                                | 1987                                 | 2029                                |
| B500                            | 12,112                               | 1957                                 | 2030                                |
| B540                            | 5,450                                | 1959                                 | 2030                                |
| B541                            | 5,450                                | 1959                                 | 2026                                |
| <b>Total SF of Demolition =</b> | <b>177,719</b>                       |                                      |                                     |

*Legend:* B = Building; SF = square feet.

### Personnel

A total of 1,144 personnel are assigned to the 173 FW (Table 2.1-5). Under the Proposed Action, approximately 30 contracted personnel would be added to support security, system administration, training, and simulator operations. This would increase total base personnel to 1,174, representing an approximate 2.65 percent increase relative to Existing Conditions (2023).

**Table 2.1-4 Summary of Construction and Renovation Projects**

| <i>Project #/<br/>Project Name</i>                          | <i>Project<br/>ID</i> | <i>Project Description</i>                                                                                                                            | <i>Preferred<br/>or<br/>Alternate<br/>Location</i> | <i>Construction<br/>Year</i> | <i>Total Area of<br/>New Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|-------------------------------------------------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------|--------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#1 Provide<br/>Training<br/>Classrooms<sup>1</sup></b>   | <b>1a</b>             | Modify existing B209 (existing simulator building) to house flight training classrooms (companion to Project 1b/1c).                                  | Alternate                                          | 2027                         | 0                                                            | 0                                              | Yes                        | No                               |
|                                                             | <b>1b</b>             | Construct addition to B209 to include entire category code (i.e., authorized area) for flight training classrooms (companion to Project 1a/1c).       | Alternate                                          | 2027                         | 3,500                                                        | 3,500                                          | Yes                        | No                               |
|                                                             | <b>1c</b>             | Construct new building containing 4 FMS, 6 MMRT, and contractor support (companion to Project 1a/1b).                                                 | Alternate                                          | 2027                         | 29,583                                                       | 29,583                                         | Yes                        | No                               |
|                                                             | <b>1d</b>             | Construct new building containing flight training classrooms, 4 FMS, 8 MMRT, and contractor support (includes demolition of B242, B230, B231).        | Preferred                                          | 2027                         | 40,400                                                       | 40,400                                         | Yes                        | No                               |
| <b>#2 Construct<br/>Aircraft<br/>Shelter</b>                | <b>2a</b>             | Construct 4-bay, 8 aircraft shelter along Echo sized to universal fighter standards.                                                                  | Alternate                                          | 2027                         | 50,000                                                       | 0                                              | Yes                        | No                               |
|                                                             | <b>2b</b>             | Construct 4-bay, 8 aircraft shelter along Bravo row sized to universal fighter standards.                                                             | Preferred                                          | 2027                         | 316,000                                                      | 272,000                                        | Yes                        | No                               |
| <b>#3<br/>Operations<br/>Group<br/>Facility<sup>2</sup></b> | <b>3a</b>             | Repair B243 operations group facility to meet F-35 requirements for special access program facilities, office space, and contractor support.          | Alternate                                          | 2028                         | 0                                                            | 0                                              | Yes                        | No                               |
|                                                             | <b>3b</b>             | Construct new operations group facility containing special access program facilities, office space, contractor support (includes demolition of B243). | Alternate                                          | 2028                         | 25,200                                                       | 0                                              | Yes                        | No                               |

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| <i>Project #/<br/>Project Name</i>                 | <i>Project<br/>ID</i> | <i>Project Description</i>                                                                                                                                                                                        | <i>Preferred<br/>or<br/>Alternate<br/>Location</i> | <i>Construction<br/>Year</i> | <i>Total Area of<br/>New Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|----------------------------------------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------|--------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
|                                                    | <b>3c</b>             | Construct new operations group facility combined with maintenance facility containing special access program facilities, office space, contractor support, includes demolition of B243 (companion to Project 9d). | Preferred                                          | 2028                         | 25,200                                                       | 0                                              | Yes                        | No                               |
| <b>#4 ASE<br/>Facility<sup>3</sup></b>             | <b>4a</b>             | Repair B216 for use as aircraft support equipment facility.                                                                                                                                                       | Alternate                                          | 2029                         | 0                                                            | 0                                              | Yes                        | No                               |
|                                                    | <b>4b</b>             | Construct addition to B332 to accommodate increase requirement for ASE facility.                                                                                                                                  | Preferred                                          | 2029                         | 1,750                                                        | 0                                              | Yes                        | No                               |
|                                                    | <b>4c</b>             | Construct new B332 for use as ASE facility.                                                                                                                                                                       | Alternate                                          | 2029                         | 15,000                                                       | 0                                              | Yes                        | No                               |
|                                                    | <b>4d</b>             | Repair B213 for use as ASE facility.                                                                                                                                                                              | Alternate                                          | 2029                         | 0                                                            | 0                                              | Yes                        | No                               |
| <b>#5 Engine<br/>Shop<sup>4</sup></b>              | <b>5a</b>             | Repair B213 engine shop for change in engine system and to include wheel/tire facility.                                                                                                                           | Alternate                                          | 2028                         | 0                                                            | 0                                              | Yes                        | No                               |
|                                                    | <b>5b</b>             | Construct new engine shop for change in engine system and to include wheel/tire facility.                                                                                                                         | Alternate                                          | 2028                         | 15,000                                                       | 5,000                                          | Yes                        | No                               |
| <b>#6 Avionics/<br/>Pilot Fitment<br/>Facility</b> | <b>6a</b>             | Repair B331 to accommodate reduced avionics, battery room, and pilot fitment facility.                                                                                                                            | Preferred                                          | 2029                         | 0                                                            | 0                                              | Yes                        | No                               |
|                                                    | <b>6b</b>             | Construct new B331 avionics, battery room, and pilot fitment facility.                                                                                                                                            | Alternate                                          | 2028                         | 12,000                                                       | 0                                              | Yes                        | No                               |
| <b>#7 Loading<br/>Dock</b>                         | <b>7</b>              | Repair loading dock for larger load leveler and better space utilization.                                                                                                                                         | Preferred                                          | 2026                         | 50,000                                                       | 4,000                                          | Yes                        | No                               |
| <b>#8<br/>Temporary<br/>LAMS<br/>Shelters</b>      | <b>8</b>              | Install temporary LAMS shelters for aircraft on existing pavements.                                                                                                                                               | Preferred                                          | 2027                         | 0                                                            | 0                                              | Yes                        | No                               |

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| <i>Project #/<br/>Project Name</i>                                                       | <i>Project<br/>ID</i> | <i>Project Description</i>                                                                                                                                               | <i>Preferred<br/>or<br/>Alternate<br/>Location</i> | <i>Construction<br/>Year</i> | <i>Total Area of<br/>New Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|------------------------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------|--------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#9<br/>Maintenance<br/>Hangar and<br/>Shops<sup>5</sup></b>                           | <b>9a</b>             | Repair and reconfigure B219 maintenance hangar and shops to include improvements for seismic, lightning protection systems, and fire protection systems.                 | Alternate                                          | 2027                         | 0                                                            | 0                                              | Yes                        | No                               |
|                                                                                          | <b>9b</b>             | Construct new 6-aircraft maintenance hangar (Phase 1), includes demolition of east bay B219 (integrates with 9c Phase 2).                                                | Alternate                                          | 2028                         | 50,700                                                       | 0                                              | Yes                        | No                               |
|                                                                                          | <b>9c</b>             | Construct new aircraft maintenance shops (Phase 2), includes demolition of west bay B219 (integrates with 9b Phase 1).                                                   | Alternate                                          | 2026                         | 36,800                                                       | 0                                              | Yes                        | No                               |
|                                                                                          | <b>9d</b>             | Construct new combined 6-aircraft maintenance hangar, aircraft maintenance shops, and AMU. Includes demolition of B219.                                                  | Preferred                                          | 2027                         | 90,000                                                       | 0                                              | Yes                        | No                               |
| <b>#10<br/>Munitions<br/>Maintenance<br/>and<br/>Inspection<br/>Facility<sup>6</sup></b> | <b>10a</b>            | Repair existing maintenance and inspection facility to meet secure area needs and update systems.                                                                        | Preferred                                          | 2027                         | 0                                                            | 0                                              | Yes                        | No                               |
|                                                                                          | <b>10b</b>            | Construct new munitions maintenance and inspection facility for 1.1 (mass detonation) and 1.2 (fragmentation) explosives operations to meet minimum explosive standards. | Preferred                                          | 2026                         | 3,900                                                        | 3,900                                          | Yes                        | No                               |
| <b>#11<br/>Munitions<br/>Trailer</b>                                                     | <b>11</b>             | Construct new pull through maintenance facility for large trailers.                                                                                                      | Preferred                                          | 2026                         | 1,500                                                        | 0                                              | Yes                        | No                               |
| <b>#12<br/>Munitions<br/>Assembly<br/>Pad</b>                                            | <b>12</b>             | Construct new munitions assembly pad and inert storage facility.                                                                                                         | Preferred                                          | 2030                         | 20,000                                                       | 20,000                                         | Yes                        | No                               |

*Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
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Final – September 2026*

| <i>Project #/<br/>Project Name</i>           | <i>Project<br/>ID</i> | <i>Project Description</i>                                                                                                              | <i>Preferred<br/>or<br/>Alternate<br/>Location</i> | <i>Construction<br/>Year</i> | <i>Total Area of<br/>New Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|----------------------------------------------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------|--------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#13 Weapons Facility<sup>7</sup></b>      | <b>13a</b>            | Repair B500 weapons release facility to meet standards for F-35 and safety and seismic upgrades.                                        | Alternate                                          | 2027                         | 0                                                            | 0                                              | Yes                        | No                               |
|                                              | <b>13b</b>            | Construct new hangar bay for weapons load training and light protection system parking spot                                             | Preferred                                          | 2027                         | 15,000                                                       | 15,000                                         | Yes                        | No                               |
|                                              | <b>13c</b>            | Construct new facility attached to weapons load training bay including all shops for associated AMU AFSC's (currently AMXS).            | Alternate                                          | 2027                         | 22,400                                                       | 22,400                                         | Yes                        | No                               |
|                                              | <b>13d</b>            | Construct new weapons release facility attached to weapons load training facility.                                                      | Preferred                                          | 2027                         | 18,000                                                       | 18,000                                         | Yes                        | No                               |
| <b>#14 Fuel Cell Bay<sup>8</sup></b>         | <b>14</b>             | Construct additional fuel cell maintenance bay onto existing B333 fuel cell bay, and lightning and fire protection system parking spot. | Preferred                                          | 2029                         | 6,800                                                        | 0                                              | Yes                        | No                               |
| <b>#15 Taxiway A</b>                         | <b>15</b>             | Repair Taxiway A access ramp to B400.                                                                                                   | Preferred                                          | 2026                         | 8,500                                                        | 0                                              | Yes                        | No                               |
| <b>#16 LRS Covered Parking</b>               | <b>16</b>             | Construct LRS covered parking for LRS primary vehicles.                                                                                 | Preferred                                          | 2030                         | 2,000                                                        | 2,000                                          | Yes                        | Yes                              |
| <b>#17 Civil Engineering Covered Parking</b> | <b>17</b>             | Construct civil engineering covered parking for snow plowing vehicles.                                                                  | Preferred                                          | 2030                         | 4,000                                                        | 4,000                                          | Yes                        | Yes                              |
| <b>#18 Troop Camp</b>                        | <b>18a</b>            | Repair existing B208 troop camp.                                                                                                        | Preferred                                          | 2040                         | 0                                                            | 0                                              | Yes                        | Yes                              |
|                                              | <b>18b</b>            | Construct new troop camp.                                                                                                               | Alternate                                          | 2040                         | 17,489                                                       | 0                                              | Yes                        | Yes                              |
| <b>#19 Services Facility</b>                 | <b>19a</b>            | Repair B229 services facility.                                                                                                          | Preferred                                          | 2035                         | 0                                                            | 0                                              | Yes                        | Yes                              |
|                                              | <b>19b</b>            | Construct new services facility.                                                                                                        | Alternate                                          | 2035                         | 2,950                                                        | 0                                              | Yes                        | Yes                              |
| <b>#20 Base Exchange/Starbase</b>            | <b>20a</b>            | Repair B302 base exchange and starbase facility.                                                                                        | Preferred                                          | 2035                         | 0                                                            | 0                                              | Yes                        | Yes                              |
|                                              | <b>20b</b>            | Construct new base exchange and starbase facility.                                                                                      | Alternate                                          | 2035                         | 7,860                                                        | 0                                              | Yes                        | Yes                              |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field Air National Guard Base, Klamath Falls, Oregon  
Final – September 2026**

| <b>Project #/<br/>Project Name</b>         | <b>Project<br/>ID</b> | <b>Project Description</b>                                                                       | <b>Preferred<br/>or<br/>Alternate<br/>Location</b> | <b>Construction<br/>Year</b> | <b>Total Area of<br/>New Ground<br/>Disturbance<br/>(SF)</b> | <b>New<br/>Impervious<br/>Surface<br/>(SF)</b> | <b>Proposed<br/>Action</b> | <b>No Action<br/>Alternative</b> |
|--------------------------------------------|-----------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------|--------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#21 Civil<br/>Engineering<br/>Shops</b> | <b>21a</b>            | Construct new civil engineering combined facility.                                               | Preferred                                          | 2030                         | 30,000                                                       | 25,600                                         | Yes                        | Yes                              |
|                                            | <b>21b</b>            | Repair B220 civil engineering shops.                                                             | Alternate                                          | 2030                         | 0                                                            | 0                                              | Yes                        | Yes                              |
|                                            | <b>21c</b>            | Repair B221 civil engineering administration.                                                    | Alternate                                          | 2030                         | 0                                                            | 0                                              | Yes                        | Yes                              |
|                                            | <b>21d</b>            | Repair B234 civil engineering emergency management and storage.                                  | Alternate                                          | 2030                         | 0                                                            | 0                                              | Yes                        | Yes                              |
| <b>#22 Dining<br/>Facility</b>             | <b>22a</b>            | Repair B130 dining facility.                                                                     | Preferred                                          | 2030                         | 0                                                            | 0                                              | Yes                        | Yes                              |
|                                            | <b>22b</b>            | Construct new dining facility.                                                                   | Alternate                                          | 2030                         | 10,800                                                       | 0                                              | Yes                        | Yes                              |
| <b>#23 C-17<br/>Ramp</b>                   | <b>23</b>             | Construct C-17 Ramp on the east side of airfield for C-17 movement per the Oregon Cascadia Zone. | Preferred                                          | 2026                         | 300,000                                                      | 300,000                                        | Yes                        | Yes                              |

Notes: <sup>1</sup>Project 1 would require the choice of Project 1a, 1b, 1c combined or Project 1d alone. Project 1d would require the demolition of B242, B230, and B231.

<sup>2</sup>Project 3 would require the choice between Project 3a, 3b, or 3c. Project 3c requires selection of Project 9d.

<sup>3</sup>Project 4 would require the choice between Project 4a, 4b, 4c, or 4d.

<sup>4</sup>Project 5a/5b would not be implemented if the preferred Project 9d is implemented. Implementation of Project 5a or 5b required that Project 9a be implemented.

<sup>5</sup>Project 9 would require the choice of Project 9a, Project 9b/9c, or Project 9d. Implementation of the Project 9c or 9d options would eliminate the need for Project 5a/5b. Project 9d is the companion to Project 3c. Project 9d would eliminate the need for Project 13c.

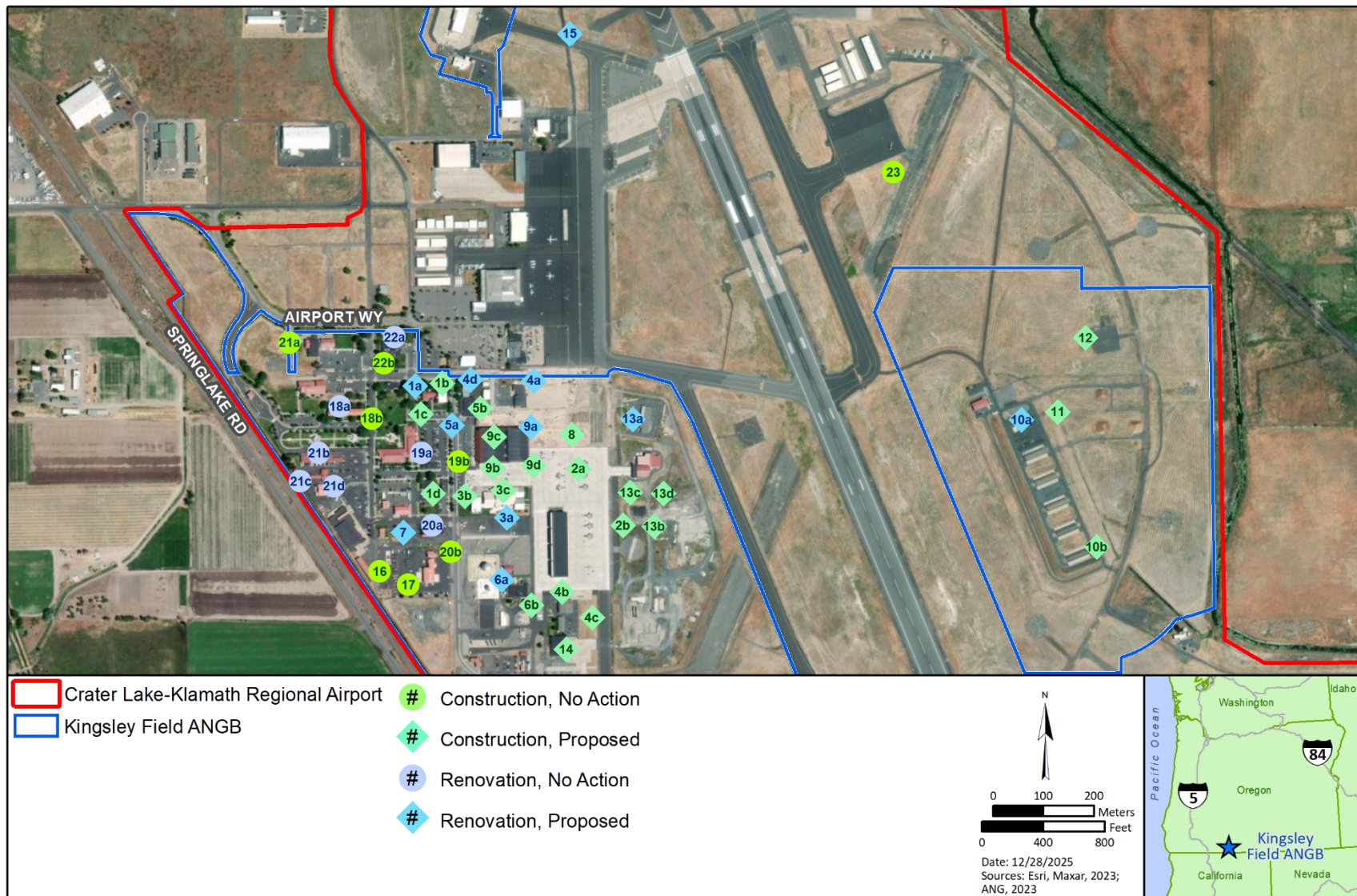
<sup>6</sup>Project 10b would require demolition of B540 and B541.

<sup>7</sup>Project 13 would require the choice of the following: 13a/13b, 13b/c, or 13 b/d. Project 13c would not be compatible with 9d.

<sup>8</sup>Project 14 would require demolition of B334.

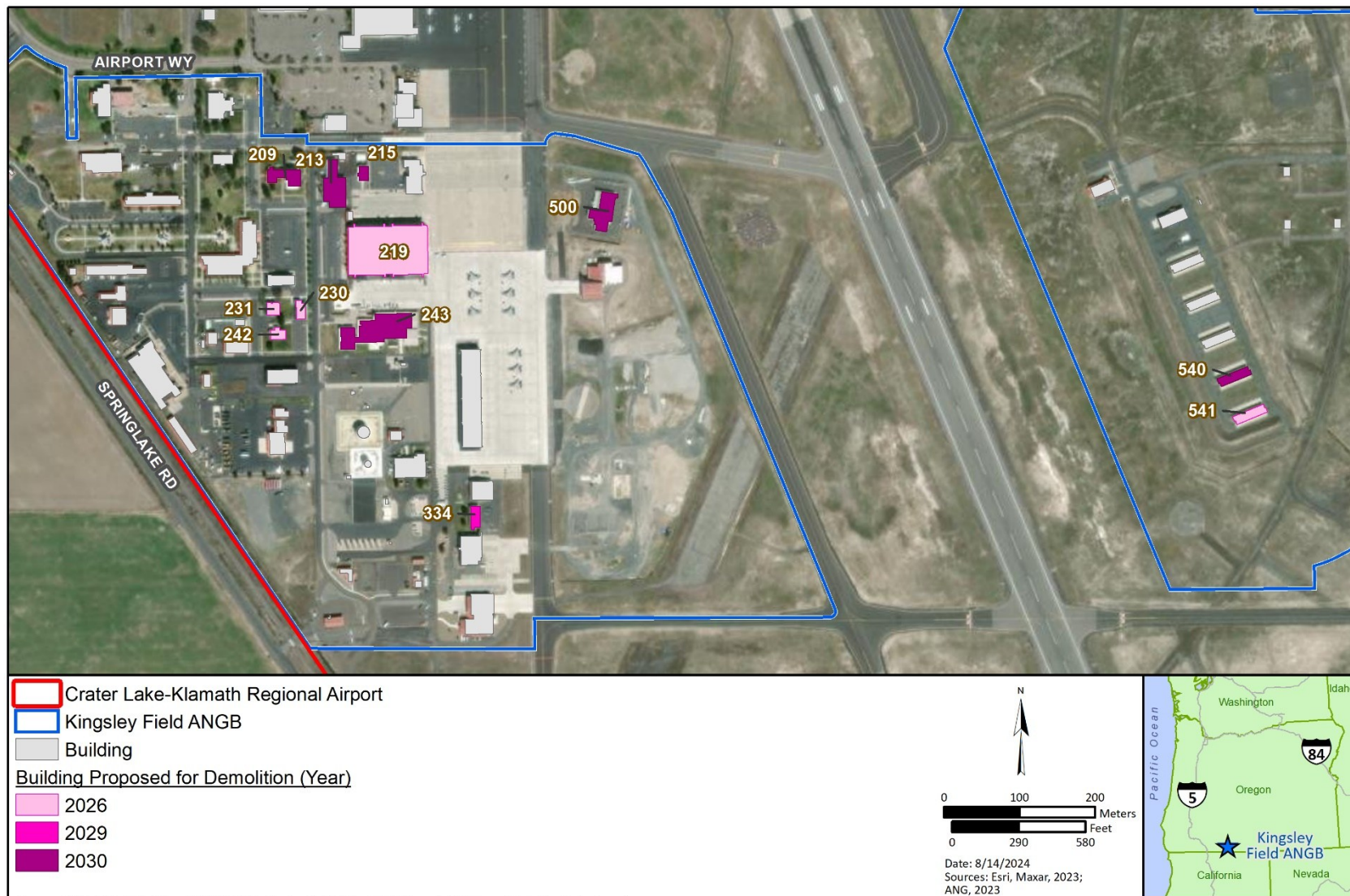
Legend: AMU = aircraft maintenance unit; AFSC = air force specialty code; AMXS = aircraft maintenance squadron; ASE = aircraft support equipment; B = Building, FMS = full motion simulator; LAMS = large area maintenance shelters; LRS = logistics readiness squadron; MMRT = mobile mission rehearsal trainer; PFF = pilot fitment facility; SF = square feet.





**Figure 2.1-1 Proposed Construction and Renovation Projects**





**Figure 2.1-2 Proposed Demolition Projects**

**Table 2.1-5 Base Personnel: Existing Conditions (2023), No Action, and Proposed Action**

| <i>Personnel</i>  | <i>Existing Conditions (2023)</i> | <i>No Action</i>                                      | <i>Proposed Action</i>               | <i>Percent Change from Existing Conditions (2023)</i> |
|-------------------|-----------------------------------|-------------------------------------------------------|--------------------------------------|-------------------------------------------------------|
| Pilots            | 38                                | 38                                                    | 38                                   | 0%                                                    |
| Maintainers       | 451                               | 451                                                   | 451                                  | 0%                                                    |
| Support Personnel | 575                               | 575                                                   | 575                                  | 0%                                                    |
| Contractors       | 60                                | 60                                                    | 90                                   | +50%                                                  |
| Students          | 20                                | 0                                                     | 20                                   | 0%                                                    |
| Total             | 1,144                             | 1,124 (-1.75% relative to Existing Conditions [2023]) | 1,174 (+4.45% relative to No Action) | +2.65%                                                |

*Legend:* % = percent.

#### 2.1.2.2 Elements Affecting the Military Training Airspace

##### Military Training Airspace

F-35A pilots must conduct training in accordance with the applicable RAP to meet training requirements and maintain combat readiness. Military flight operations would occur within existing military training airspace. The 173 FW utilizes Military Operations Areas (MOAs), Air Traffic Control Assigned Airspace (ATCAA), Warning Areas (W-), and Restricted Areas (R-) for training. No modifications to the military training airspace are proposed under the Proposed Action; however, utilization of the existing airspace could increase to support F-35A training requirements.

F-35A training is expected to follow a similar general altitude profile to F-15C/D training; however, the majority of F-35A training would occur above 20,000 feet mean sea level (MSL). While the majority of F-35A training will occur at higher altitudes, the percentage of time spent in low-altitude training (500 feet above ground level [AGL] to 10,000 feet MSL) is expected to increase slightly from 5 percent to 6 percent, as detailed in Table 2.1-6. This shift reflects training objectives emphasizing survivability against surface-to-air threats, which drive greater use of high-altitude airspace and increased standoff distances.

**Table 2.1-6 F-35A and F-15C/D Training Altitude Distribution**

| <i>Altitude (feet)</i> | <i>Percent Use – F-15C/D</i> | <i>Percent Use – F-35A</i> |
|------------------------|------------------------------|----------------------------|
| 500–5,000 AGL          | 2                            | 2                          |
| 5,000 AGL–10,000 MSL   | 3                            | 4                          |
| 10,000–20,000 MSL      | 50                           | 33                         |
| 20,000–30,000 MSL      | 26                           | 39                         |
| 30,000–40,000 MSL      | 17                           | 21                         |
| >40,000 MSL            | 2                            | 1                          |

*Legend:* > = greater than; AGL = above ground level; MSL = mean sea level.

Existing military training airspace used by the 173 FW, includes both overland and overwater military training airspace (Figure 2.1-3). ATCAAs overlie the Juniper/Hart, Dolphin, and Goose MOAs with altitudes spanning from 18,000 feet MSL up to 51,000 feet MSL.

### Range Operations

The 173 FW does not perform operations at any air-to-ground range given that they do not have an air-to-ground mission under Existing Conditions (2023). However, with the F-35A aircraft, they would train in target delivery at the Saylor Creek Bombing Range, Idaho, which is associated with Mountain Home AFB, Idaho. Though the majority of this training is conducted in the simulator or with simulated ordnance during flights in the existing military training airspace, each pilot would have to train at the Saylor Creek Bombing Range for one sortie per syllabus rotation. This would result in 100 sorties at Saylor Creek, which would be well within the level of transient activity that has been evaluated at the range.

### Supersonic Operations

The F-15C/D uses supersonic flight regularly, capable of brief bursts up to 10 minutes. The air-to-air mission is enhanced by the ability to use higher speeds for a number of reasons. To train with the full capabilities of the aircraft, F-35A pilots would employ supersonic flight (i.e., flying at or greater than the speed of sound). All supersonic flights would occur within airspace and at altitudes approved for such activities. The DAF anticipates that time spent in air-to-air combat training would involve supersonic flight for shorter durations compared to the F-15C/D, approximately 2 to 3 minutes at a time, due to the F-35's design for internal carriage and fuel efficiency at high-subsonic speeds. Supersonic speeds enable the aircraft to employ weapons at greater distances than an adversary aircraft with less supersonic capability. After simulated weapon employment, the aircraft uses its speed to evade adversary missiles and aircraft.

The F-35A would also use supersonic flight regularly for their air-to-air training and for some of their air-to-ground training. It is expected that completion of multi-role fighter training syllabi would result in the same percentage (or less) of supersonic flight than a purely air-to-air mission, and the flight conditions would be subject to the same policy and regulations adhered to by the F-15C/D under Existing Conditions (2023) in these same military training airspace blocks.

Specific use of supersonic speeds are listed by syllabus training event in the *Final Noise Study* (DAF 2026).

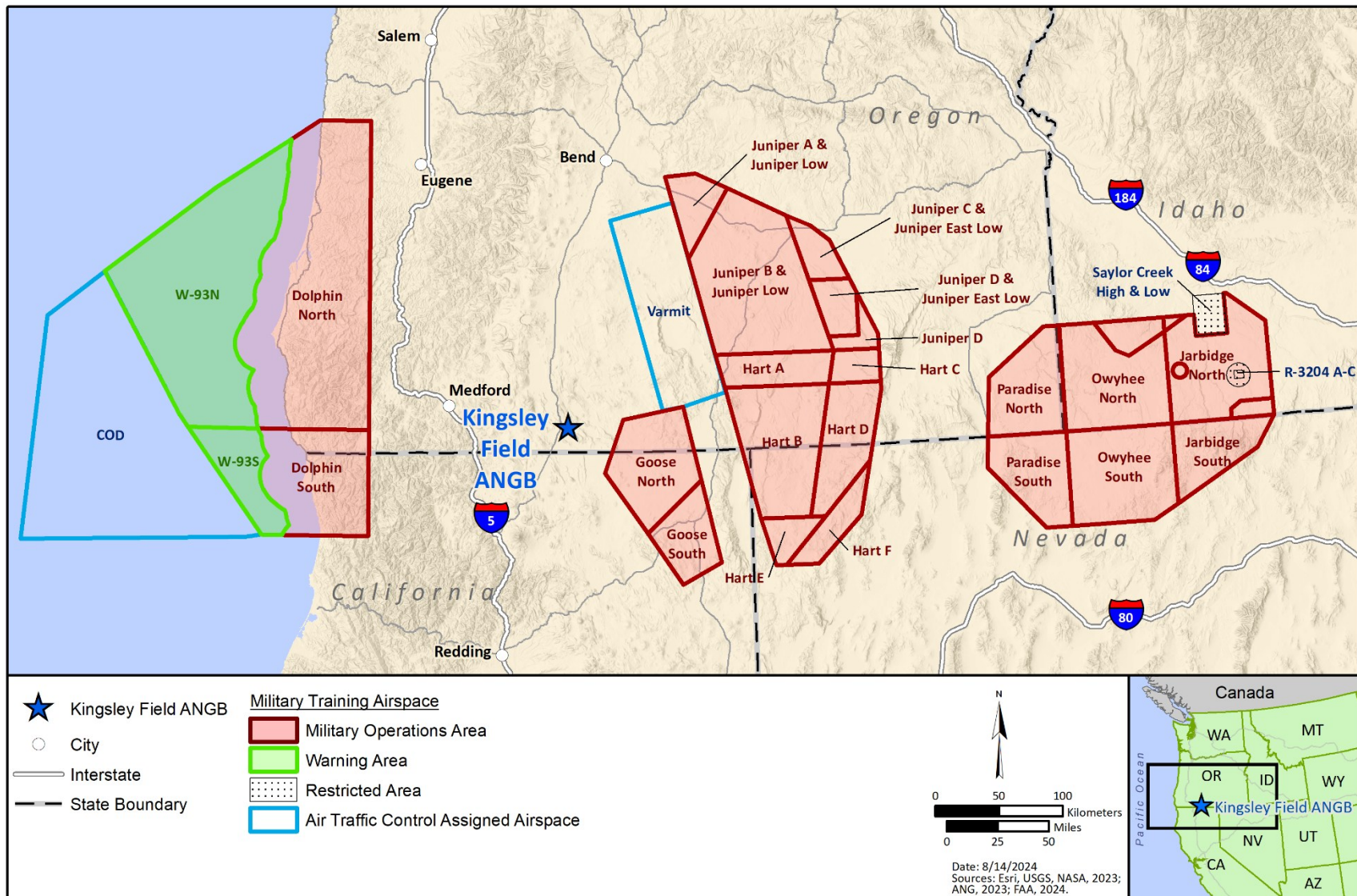
### Defensive Countermeasure Use

Chaff and flares are the principal defensive countermeasures dispensed by military aircraft to evade attack by enemy air defense systems. Although the F-35A's stealth features substantially reduce its detectability, pilots must train to employ defensive countermeasures.

A bundle of chaff consists of approximately 5.0 to 5.6 million aluminum- or zinc-coated silica fibers that are cut to reflect radar signals. When dispensed, chaff forms an electronic "cloud" that produces a radar return and can temporarily obscure the aircraft from radar detection. RR-180 and RR-188 chaff are approved by the FAA for training in military training airspace.

Flares provide a high-temperature heat source intended to mislead heat-seeking targeting systems. Flares burn at temperatures exceeding 2,000°F and are designed to burn out within approximately 500 feet of release (generally 3 to 5 seconds) (DAF 2023b). The Oregon ANG would continue to implement a minimum flare release altitude of 5,000 feet AGL just for flares deployed in ANG-managed Oregon military training airspace (NGB 2017).





**Figure 2.1-3 Military Training Airspace Used by the 173 FW**

Chaff and flare use is authorized in ANG-managed military training airspace in Oregon (NGB 2017). The 173 FW would continue to adhere to applicable local operating procedures for chaff and flare employment, including procedures for the Mountain Home military training airspace and restricted airspace associated with the Saylor Creek Range (DAF 2023a, p. 2-3). The allocation and use of defensive countermeasures are not expected to change under the Proposed Action. The 173 FW would continue to receive the same chaff and flare allocation, and these countermeasures would be used at the same rates, in the same locations, and under the same operating parameters that apply under Existing Conditions (2023).

### Ordnance Use

Air-to-air ordnance is used to destroy other aircraft and includes air-to-air missiles (AIM-120 and AIM-9) and the cannon. The F-15C/D is equipped with a 20-millimeter (mm) cannon, while the F-35A is equipped with a 25-mm cannon; both aircraft employ the same air-to-air missile. Air-to-ground ordnance is used for ground-based targets. The F-15C/D does not carry any air-to-ground ordnance because it does not have an air-to-ground mission. For air-to-air training, the F-15C/D carries non-releasable training missiles and instrument pods that record flight data; these training aids do not separate from the aircraft.

No live air-to-ground munitions would be assembled, stored, or loaded at Kingsley Field ANGB. Inert air-to-ground munitions would be used for munitions assembly and load training. Under the Proposed Action, munitions activities for the F-35A would be similar in type and amount to those for the F-15C/D. Air-to-ground training would be conducted primarily through aircraft training modes (i.e., air-to-ground ordnance is neither physically loaded nor released), simulator training events, and deployments to approved training locations (e.g., Saylor Creek Bombing Range) that support live or inert weapons release. On rare occasions (i.e., only when required for specific training events), inert ordnance would be loaded on aircraft and released within approved local restricted areas. All existing regulations governing ordnance safety, storage, handling, and use would remain unchanged.

## **2.2 NO ACTION ALTERNATIVE**

Analysis of the No Action Alternative provides a baseline to enable decision-makers and the public to compare the magnitude of the environmental effects of the Proposed Action. Since completion of the affected environment data collection in 2023 (referred to throughout this EIS as “Existing Conditions [2023]”), the divestment of the 173 FW’s F-15C/D aircraft occurred more rapidly than anticipated, and regular F-15C/D flying operations are no longer being conducted at Kingsley Field ANGB. Under the No Action Alternative, the DAF would not implement the Proposed Action and no regular F-15C/D flying operations would occur at Kingsley Field ANGB, although some other (e.g., transient) aircraft operations would still occur. This No Action Alternative does not meet the purpose and need for this action because leaving the 173 FW’s mission without permanently based aircraft would negatively impact the 173 FW’s ability to meet future pilot training requirements. This would create negative impacts to the DAF enterprise’s ability to meet F-35A pilot production requirements and national security.

Under the No Action Alternative, F-35A aircraft would not be based at Kingsley Field ANGB, and no training activities involving F-35A aircraft operated by the 173 FW would occur in the military training airspace. Additionally, construction associated with the proposed F-35A beddown would

not be implemented at LMT/Kingsley Field ANGB. Existing installation and airport operations would continue, including civil operations and military activity such as Adversary Air (ADAIR) and other transient aircraft operations. Construction and repair projects necessary to support ongoing base operations would continue and reflect independent ongoing base sustainment requirements (Tables 2.1-3 and 2.1-4 and Figures 2.1-1 and 2.1-2), regardless of the aircraft platform in use.

To assess the environmental effects of the Proposed Action compared to the No Action Alternative, the DAF modeled potential effects of the F-15C/D operations under the assumption that by 2029 all F-35A aircraft would be operational at LMT/Kingsley Field ANGB. Due to the increasing maintenance requirements and resulting “down-time” of the F-15C/D fleet, F-15C/D operations were originally estimated to decrease by 29 percent relative to Existing Conditions (2023). While civil aircraft operations are projected to increase, the substantial reduction in military aircraft operations results in an overall 4.7 percent decrease in total combined civil and military airfield operations (Table 2.2-1).

**Table 2.2-1 Existing Conditions (2023), No Action, and Estimated Proposed Annual Airfield Operations**

| <i>Aircraft Type</i>      | <i>Total Aircraft Operations Existing Conditions (2023)</i> | <i>No Action Aircraft Operations<sup>1</sup></i>                                                                                               | <i>Total Proposed Aircraft Operations</i>             | <i>Change from Existing Conditions (2023)</i> |
|---------------------------|-------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------------|
| F-15C/D                   | 13,440                                                      | 9,600 (0)                                                                                                                                      | 0                                                     | -13,440                                       |
| F-35A                     | 0                                                           | 0                                                                                                                                              | 20,780                                                | +20,780                                       |
| Contract ADAIR            | 1,760                                                       | 1,760                                                                                                                                          | 1,760                                                 | 0                                             |
| Civil <sup>2</sup>        | 24,197                                                      | 26,102                                                                                                                                         | 26,102                                                | +1,905                                        |
| Transient                 | 1,638                                                       | 1,638                                                                                                                                          | 1,638                                                 | 0                                             |
| Total Airfield Operations | 41,035                                                      | 39,100 (29,500)                                                                                                                                | 50,280                                                | +9,245                                        |
| Percent Change            | N/A                                                         | -4.7% (-28.1%)<br>Relative to Existing Conditions (2023)<br>(Comparison between No Action Alternative and current-day operations) <sup>2</sup> | +28.6% (+41.3%) <sup>3</sup><br>Relative to No Action | +22.5%                                        |

*Notes:* <sup>1</sup>Values in parentheses represent military-only aircraft operations and their corresponding percentage changes (excluding civil operations).

<sup>2</sup>Civil operations represent the combined annual runway operations of Air Carrier, Air Transport, and General Aviation.

<sup>3</sup>Relative to Existing Conditions (2023) (Comparison between No Action Alternative and current-day operations).

*Legend:* N/A = Not Applicable.

*Source:* FAA 2023.

However, as F-15C/D aircraft were divested more quickly than anticipated, the DAF’s 2029 estimates of these operational numbers are akin to those experienced by the public in the late 2024 to early 2025 timeframe. As such, the No Action Alternative discussed throughout this EIS corresponds to flight activity during this timeframe and provides a choice among options to ensure that the effects of not undertaking the Proposed Action are reasonably understood. The DAF acknowledges that because the F-15C/D aircraft at Kingsley Field ANGB have now been fully divested, the environmental effects the public are currently experiencing are significantly lower than this modeling. The DAF is providing reasonable comparisons of environmental impacts of not implementing the Proposed Action via the No Action Alternative, affording the public the

opportunity to see how the F-35A aircraft's effects would differ from the effects recently experienced from the F-15C/D aircraft.

## **2.3 ALTERNATIVES ELIMINATED**

The DAF evaluated various options for the future of the F-15 fleet, including the potential establishment of an F-15EX FTU. Kingsley Field ANGB was initially considered for this mission based on its existing F-15 training infrastructure. However, the overarching DAF strategic analysis determined a greater need for F-35 pilot production capacity to meet long-term force structure goals and replace the aging F-15C/D fleet nationwide. While the 173 FW was considered for the F-15EX FTU, it was determined that additional F-35A pilot production capacity was required beyond the capabilities of Pilot Training Centers 1 and 2 at Eglin and Luke AFBs. No other replacement mission or weapon system changes were considered for Kingsley Field ANGB due to its existing FTU infrastructure and expertise.

The decision to focus exclusively on the F-35 mission at Kingsley Field ANGB was a result of a comprehensive basing criteria analysis. Kingsley Field ANGB was uniquely identified as the sole candidate location that met the "enterprise definition" for the ANG F-35 FTU due to the availability of military training airspace and established training infrastructure. Other bases evaluated within the strategic basing process did not possess these specific critical factors, making Kingsley Field ANGB the only viable location that met the DAF's defined purpose and need for the F-35 FTU training mission.

## **2.4 COMPARISON OF ENVIRONMENTAL CONSEQUENCES BY ALTERNATIVE**

### **2.4.1 Comparison of Environmental Consequences by Alternative**

Comparing and differentiating among alternatives are a fundamental premise of NEPA. For the alternatives identified for this Proposed Action, summaries and comparisons of consequences are presented in Table 2.4-1.



**Table 2.4-1 Summary of Effects**

| <i>Resource</i> | <i>No Action</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <i>Proposed Action</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Noise           | <p><b>Installation:</b> Noise from aircraft operations around LMT/Kingsley Field ANGB would expose about 946 households (2,348 people) and three noise-sensitive POIs to noise levels of DNL 65 dB or greater. At the 10 affected schools, aircraft operations would cause 1–3 speech-interfering events per hour, with 3–10 minutes per day above 50 dB under windows-open conditions. Because noise levels under the No Action Alternative would decrease, the alternative would not cause a noise increase of DNL 1.5 dB or more. Therefore, noise effects under the No Action Alternative would not be significant under FAA criteria.</p> <p><b>Airspace:</b> Within military training airspace, noise levels would remain between 35–47 dB, consistent with ambient rural conditions, and below thresholds for noise-sensitive uses, resulting in no significant noise effects.</p>                       | <p><b>Installation:</b> Noise from aircraft operations around LMT/Kingsley Field ANGB would expose about 1,865 households (4,629 people) and three additional noise-sensitive POIs to noise levels of DNL 65 dB or greater. This represents an increase of 919 households and 2,281 people compared to the No Action Alternative. At the 10 affected schools, aircraft operations would result in 1–3 additional speech-interfering events per hour, increasing classroom disruption by 4–14 minutes per day, with a 1–2 percent rise in the percentage of highly annoyed individuals. Because the Proposed Action would cause a noise increase of DNL 1.5 dB or more for noise-sensitive areas exposed at or above the DNL 65 dB level (affecting 1,948 households and 4,834 people), noise effects around LMT/Kingsley Field ANGB would be considered a significant effect under FAA criteria.</p> <p><b>Airspace:</b> Within military training airspace, DNL and <math>L_{dnmr}</math> would increase by approximately 2–5 dB, but would remain below 50 dB, well under thresholds for noise sensitive land uses and occurring over sparsely populated areas. Therefore, noise effects within military training airspace would not be significant.</p> |
| Airspace        | <p><b>Installation:</b> Military aircraft operations by the 173 FW would be reduced by 29 percent (to approximately 9,600 annual operations) relative to Existing Conditions (2023). While civil aircraft operations are projected to increase slightly, this substantial reduction in military flights would lead to a net 4.7 percent decrease in total combined (civil and military) airfield operations at LMT/Kingsley Field ANGB. Operations by transient military and contractor ADAIR aircraft would remain unchanged. Effects on installation airspace would not be significant.</p> <p><b>Airspace:</b> F-15C/D training in the Juniper/Hart, Goose, and Dolphin MOAs may continue at reduced sortie levels, with contractor ADAIR use remaining the same. As training activity decreases and airspace structure stays unchanged, effects on military training airspace would not be significant.</p> | <p><b>Installation:</b> F-35A operations would total approximately 20,780 annual 173 FW airfield operations, replacing F-15C/D operations (13,440 existing; 9,600 No Action), an increase of about 55% over Existing Conditions (2023) and 116.5% over No Action. Overall, total airfield operations at LMT/Kingsley Field ANGB would increase 22.5% relative to Existing Conditions (2023) and 29% relative to No Action modeled scenarios. All operations would use existing airfield airspace and procedures, so effects would not be significant.</p> <p><b>Airspace:</b> F-35A training would occur within the existing MOAs and W-93, with no changes to boundaries, altitudes, or management. Despite increased sortie levels, activities would remain consistent with Existing Conditions (2023) fighter training, and no airspace modifications are proposed, so effects on military training airspace would not be significant.</p>                                                                                                                                                                                                                                                                                                             |
| Air Quality     | <p><b>Installation:</b> F-15C/D emissions would remain below <i>de minimis</i> thresholds (100 tpy for PM<sub>2.5</sub> precursors) and PSD thresholds (250 tpy for CO, PM<sub>10</sub>). Military training airspace emissions are limited due to</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p><b>Installation:</b> Construction and F-35A operational emissions would remain below <i>de minimis</i> thresholds (100 tpy for PM<sub>2.5</sub> precursors) and PSD thresholds (250 tpy for CO, PM<sub>10</sub>). Military training airspace</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <i>Resource</i>                                             | <i>No Action</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <i>Proposed Action</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                             | less than 2 hours per year of flight below the mixing height. No significant effects on air quality are anticipated.<br><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | emissions are limited due to less than 2 hours per year of flight below the mixing height where emissions could affect ground-level concentrations. No significant effects on air quality are anticipated.<br><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Socioeconomics/<br>Protection of<br>Children and<br>Elderly | <b>Installation:</b> Reduced F-15C/D operations would result in minor decreases in employment, spending, and investment, leading to small negative socioeconomic effects. Noise exposure would also decrease, with approximately 2,348 residents remaining within the DNL 65 dB contour, 599 fewer than Existing Conditions (2023). This includes 167 fewer children and 117 fewer elderly individuals. The demographic composition would remain nearly identical, and because exposure decreases without shifting proportions, effects on children and elderly would not be significant.<br><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale. | <b>Installation:</b> Increased military aircraft operations and associated support activities would generate an estimated \$10–15 million in additional annual spending and create 30–40 secondary jobs, resulting in positive socioeconomic effects. Noise exposure around LMT/Kingsley Field ANGB would increase the population within the DNL ≥ 65 dB contour to approximately 4,629 residents, including 1,291 children (27.8%) and 916 elderly (19.8%). Although the Proposed Action would increase the total number of children exposed to noise levels at or above DNL 65 dB, this impact is not considered disproportionate. The location of the noise exposure is attributable to the airfield's runway orientation and existing flight paths. The analysis confirms that these flight paths do not specifically or uniquely pass over schools, childcare centers, parks, or other locations where children are known to concentrate. Because the noise impact is a function of geographic proximity to the airfield rather than an unequal distribution near child-specific facilities, no disproportionately high and adverse effects on children are anticipated.<br><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale. |
| Land Use/Noise<br>Compatible Land<br>Use                    | <b>Installation:</b> Within the DNL 65 dB or greater contour, 698 acres of land adjacent to LMT are considered non-compatible under FAA guidelines. This consists of 416 acres of residential land (representing 946 non-compatible residential properties), 270 acres of commercial and industrial land, and 12 acres of public land.<br><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.                                                                                                                                                                                                                                                    | <b>Installation:</b> Total non-compatible land adjacent to LMT would increase to approximately 1,396 acres, a net increase of 698 acres over the No Action Alternative. Non-compatible residential land would increase to 688 acres (representing 1,865 non-compatible residential properties, a net increase of 919 properties). The remaining non-compatible acreage consists of 673 acres of commercial and industrial land and 35 acres of public land.<br><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Water Resources/<br>Floodplains/Wild<br>and Scenic Rivers   | <b>Installation:</b> Potential water resource effects would be limited to short-term erosion and sedimentation during construction and minor changes in runoff volume and timing after construction. Erosion, sedimentation, and long-term runoff would be managed through                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Installation:</b> Potential water resource effects would be limited to short-term erosion and sedimentation during construction and minor changes in runoff volume and timing after construction. These effects would be managed through project-specific erosion and sediment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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| <i>Resource</i>                      | <i>No Action</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <i>Proposed Action</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      | <p>project-specific erosion and sediment control measures, BMPs, and compliance with applicable Oregon requirements and NPDES permit conditions. With these measures in place, runoff and sediment would be controlled and discharges would remain regulated; therefore, potential effects on surface water, groundwater, and drainage features would be minor and localized, and effects on water resources under the No Action Alternative would not be significant.</p> <p><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>control measures, standard BMPs, and compliance with applicable Oregon requirements and NPDES permit conditions, along with existing and/or project-specific stormwater management practices as needed to meet state and federal requirements. With these measures in place, potential effects on surface water, groundwater, and drainage features would be minor and localized; therefore, effects on water resources under the Proposed Action would not be significant.</p> <p><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.</p>                                                                                                                                                                                                                                                                                                                                                                                                             |
| Geological Resources/Soils/Farmlands | <p><b>Installation:</b> Ground-disturbing activities would occur to support ongoing base operations and would continue to follow Oregon erosion and sediment control laws, existing BMPs, and NPDES permit requirements, all of which are part of established base practices. These activities would take place on previously developed or industrialized areas designated as farmland of statewide importance and would not disturb prime farmland or convert farmland to non-agricultural uses. Because construction would remain within areas already altered by prior development and standard protective practices are part of the Existing Conditions (2023), potential impacts to geological resources, soils, and farmland would remain below the threshold of significance. Effects on installation geological resources, soils, and farmland under the No Action Alternative would not be significant.</p> <p><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.</p> | <p><b>Installation:</b> Ground-disturbing activities would occur under the Proposed Action and would continue to follow Oregon erosion and sediment control laws, existing BMPs, and NPDES permit requirements, all of which are part of established operations at Kingsley Field ANGB. Construction would occur on previously developed areas designated as farmland of statewide importance and would not disturb prime farmland or convert farmland to non-agricultural uses. Because construction would be confined to areas already altered by prior development and standard protective practices are part of the Existing Conditions (2023), potential impacts to geological resources, soils, and farmland would remain below the threshold of significance. Effects on installation geological resources, soils, and farmland under the Proposed Action would not be significant.</p> <p><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.</p> |
| Cultural Resources                   | <p><b>Installation:</b> Implementation would not result in significant effects on cultural resources (i.e., archaeological, architectural, traditional cultural places/sacred sites). Under a No Action alternative with no construction, renovation, or demolition undertakings, no historic properties would be affected per 36 CFR Section 800.4(d)(1)</p> <p><b>Airspace:</b> Under the No Action Alternative, no adverse effects would occur to historic properties beneath military training airspace under 36 CFR section 800.5(b).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p><b>Installation:</b> Implementation of the Proposed Action resulted in an Adverse Effect to the NRHP-eligible Kingsley Field Alert Hangar Historic District, due to the demolition of Building 219. The adverse effect was resolved through a Memorandum of Agreement with the Oregon SHPO under 36 CFR section 800.6(c), which stipulates specific mitigation measures. With the measures identified in the Memorandum of Agreement, no unmitigated significant impacts on cultural resources will occur at the installation.</p> <p><b>Airspace:</b> No adverse effects would occur to historic properties beneath military training airspace from aircraft overflights under 36 CFR section 800.5(b).</p>                                                                                                                                                                                                                                                                         |

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| <i>Resource</i>                                 | <i>No Action</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <i>Proposed Action</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Safety                                          | <p><b>Installation:</b> Safety risks associated with the aging F-15C/D fleet could increase due to rising maintenance needs and the potential for in-flight emergencies. Construction to support base operations would be designed and implemented to meet applicable safety requirements and standards, including AT/FP, explosive safety, and fire protection. Effects on installation safety would not be significant.</p> <p><b>Airspace:</b> BASH management and mid-air collision avoidance measures would remain unchanged. With reduced airfield operations and no changes to safety protocols, effects on airspace safety would not be significant.</p>                                                                                                                        | <p><b>Installation:</b> Proposed construction would be designed and implemented to meet applicable fire protection and AT/FP requirements and standards. Modifications to munitions storage facilities would be carried out, but explosive safety requirements (e.g., siting/quantity-distance and operational controls) would continue to apply, and explosive safety risks would remain similar. Effects on installation safety would not be significant.</p> <p><b>Airspace:</b> Airfield safety procedures, the MACA program, and BASH management would remain unchanged, with no substantial change in the risk of bird/wildlife strikes or mid-air collisions. Effects on airspace safety would not be significant.</p>                                                                                                                                                                                                                                                                                                       |
| Hazardous Materials/Waste                       | <p><b>Installation:</b> Hazardous materials and wastes would continue to be managed under applicable plans and regulations. ACM, LBP, and any contaminated media encountered during limited construction activities would be handled per established procedures. No significant effects on closed ERP sites or areas of interest are anticipated. Effects associated with hazardous materials and waste at the installation would not be significant.</p> <p><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.</p>                                                                                                                                                                                                                                      | <p><b>Installation:</b> Hazardous materials and waste would increase with higher airfield operations but would be managed through the SPCC Plan and HWMP. ACM, LBP, and any contaminated media encountered during construction would be handled per established procedures. No significant effects on closed ERP sites or areas of interest are anticipated. Effects associated with hazardous materials and waste at the installation would not be significant.</p> <p><b>Airspace:</b> Not evaluated for this component. See Table 3.1-1 for rationale.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Biological Resources/Coastal Resources/Wetlands | <p><b>Installation:</b> Biological resources would remain exposed to operational noise at these reduced levels. Construction activities would occur on previously developed sites with BMPs to protect aquatic species and water resources. No significant effects on biological or wetland resources are anticipated, and effects would remain consistent with Existing Conditions (2023).</p> <p><b>Airspace:</b> No new ground disturbance would occur, and ordnance delivery, chaff, and flare use would remain within Existing Conditions (2023) levels in authorized locations. No significant effects on biological resources are expected in the military training airspace. No significant effects on biological resources are expected in the military training airspace.</p> | <p><b>Installation:</b> LMT/Kingsley Field ANGB is primarily developed and wildlife in the area is already exposed to elevated aircraft and military noise (as established in the Existing Conditions [2023]), so additional noise effects would not be significant. Applegate's milk-vetch, the only threatened or endangered species on base, would not be affected by construction, demolition, or renovation. BMPs would be implemented to protect aquatic species, and no projects are located in or adjacent to wetlands. Overall, effects on biological and wetland resources would not be significant.</p> <p><b>Airspace:</b> Proposed F-35A overflights would occur within existing military training airspace. Aircraft operations and chaff/flare use would remain within authorized levels. The increase in overflight noise is intermittent and not expected to significantly disrupt wildlife behavior, including for special status species. Effects on airspace biological resources would not be significant.</p> |
| Visual Resources                                | <p><b>Installation:</b> Construction, renovation, and demolition activities to support ongoing base operations would be implemented. The base and</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p><b>Installation:</b> All proposed construction would occur within the leasehold of Kingsley Field ANGB and be visually consistent with</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <b><i>Resource</i></b>                                                                                                     | <b><i>No Action</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b><i>Proposed Action</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                            | surrounding visual environment would remain largely consistent with Existing Conditions (2023), and no notable changes to the overall landscape or visual character are expected. Therefore, no significant effects on visual resources would occur.<br><b>Airspace:</b> Not evaluated for this component; see Table 3.1-1 for rationale.                                                                                                                                                                             | existing infrastructure. No aesthetically sensitive areas or historic districts are within the viewshed, and light emissions would not appreciably increase beyond Existing Conditions (2023) levels. Effects on visual resources would not be significant.<br><b>Airspace:</b> Not evaluated for this component; see Table 3.1-1 for rationale.                                                                                                                                                                                                                                                                             |
| Infrastructure/<br>Utilities/<br>Natural Resources<br>and Energy<br>Supply/<br>Transportation/<br>Public<br>Transportation | <b>Installation:</b> Construction under the No Action Alternative would add approximately 331,600 SF of impervious surface, with temporary runoff managed via drainage controls. Brief utility interruptions and minor increases in energy demand and solid waste generation could occur, but existing systems can accommodate these. Effects on infrastructure, utilities, energy, and transportation would not be significant.<br><b>Airspace:</b> Not evaluated for this component; see Table 3.1-1 for rationale. | <b>Installation:</b> Construction would add approximately 704,900 SF of impervious surface. Slight increases in water use, wastewater, electricity, natural gas, and solid waste would occur, but regional systems can accommodate these. Standard construction practices and energy-efficient designs would minimize stormwater and utility impacts. An additional 30 personnel would not result in significant changes to traffic. Overall effects on infrastructure, utilities, energy, and transportation would not be significant.<br><b>Airspace:</b> Not evaluated for this component; see Table 3.1-1 for rationale. |

*Legend:* % = percent; ≥ = greater than or equal to; 173 FW = 173d Fighter Wing; ACM = asbestos-containing material; ADAIR = Adversary Air; ANGB = Air National Guard Base; AT/FP = antiterrorism/force protection; BASH = Bird/Wildlife Aircraft Strike Hazard; BMP = Best Management Practice; CFR = Code of Federal Regulations; CO = Carbon Monoxide; dB = decibel; DNL = Day-Night Average Sound Level; ERP = Environmental Restoration Program; FAA = Federal Aviation Administration; HWMP = Hazardous Waste Management Plan; LBP = lead-based paint; L<sub>dnmr</sub> = Onset-Rate Adjusted Monthly Day-Night Average A-weighted Sound Level; LMT = Crater Lake-Klamath Regional Airport; MACA = Mid-air Collision Avoidance; MOA = Military Operations Area; NPDES = National Pollutant Discharge Elimination System; NRHP = National Register of Historic Places; PM<sub>10</sub> = particulate matter less than or equal to 10 microns in diameter; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; POI = Point of Interest; PSD = Prevention of Significant Deterioration; SF = square foot/feet; SHPO = State Historic Preservation Office; SPCC = Spill Prevention Control and Countermeasures; tpy = tons per year; W- = Warning Area.

### **3.0           AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

#### **3.1           INTRODUCTION**

The analysis in this EIS is based on Existing Conditions data collected in 2023. Since initiation of the EIS technical analyses (including noise modeling), operational conditions at Kingsley Field ANGB have changed: the divestment of the 173 FW F-15C/D aircraft occurred more rapidly than anticipated, and the 173 FW no longer conducts regular F-15C/D flying operations at LMT/Kingsley Field ANGB. Civil operations and other military activity (including ADAIR and transient aircraft operations) continue at LMT. For clarity, “Existing Conditions (2023)” refers to the modeled data used for all analyses and does not represent current-day operations.

The No Action Alternative, described in Section 2.2, is retained as the analytical “not implementing the Proposed Action” baseline to ensure a consistent comparison of effects for evaluating the Proposed Action and the No Action Alternative. As discussed in that section, the No Action Alternative discussed throughout this EIS corresponds to F-15C/D flight activity during late 2024 to early 2025 timeframe.

##### **3.1.1       Analytical Approach**

This analysis describes the affected environment and evaluates potential effects associated with implementation of the Proposed Action and the No Action Alternative. Some aspects of the Proposed Action may affect both the base and the military training airspace; however, resources located solely beneath the military training airspace, where no ground disturbance, construction, or infrastructure changes would occur, are excluded from detailed analysis because there is no causal mechanism for impacts.

Table 3.1-1 identifies resources associated with the base and military training airspace. Not all resources affected at the base are affected within the military training airspace. For example, construction and personnel changes could affect socioeconomics at the base and its environs, but no elements of the action would affect socioeconomic conditions beneath the military training airspace.

**Table 3.1-1   Resources Not Carried Forward for Detailed Analysis**

| <i>Resource</i>                                    | <i>Affected Environment Component</i> | <i>Summary of Rationale for No Detailed Analysis</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Socioeconomics/<br>Children’s Health<br>and Safety | Military Training<br>Airspace         | Socioeconomic effects beneath the military training airspace were not carried forward for detailed analysis because aircraft overflight does not involve construction, ground disturbance, population changes, or development activity on the ground. The proposed use of the airspace would be consistent with ongoing activities, and no significant socioeconomic-related conditions beneath the airspace would be altered under the Proposed Action. Socioeconomic effects, including employment and spending changes, are addressed separately under the installation components, where ground-based activities and associated increases in F-35 operations would take place. |

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| <b><i>Resource</i></b>                                                                                              | <b><i>Affected Environment Component</i></b>                          | <b><i>Summary of Rationale for No Detailed Analysis</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Land Use/Noise<br>Compatible Land Use                                                                               | Military Training<br>Airspace                                         | Land use is not applicable to the military training airspace component because aircraft overflight does not affect land ownership, land use patterns, or development activities on the ground beneath the airspace.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Department of<br>Transportation,<br>Section 4(f)                                                                    | Installation and Military<br>Training Airspace                        | Under Section 4(f) of the DOT Act of 1966 (49 USC Section 303), a property must be a significant resource for Section 4(f) to apply and any project proponent that receives funding from or requires the approval of the DOT, must be analyzed for compliance with Section 4(f). However, there are no Section 4(f) resources on airport property or the Oregon ANG leasehold where construction projects will occur. In addition, under Public Law 105–85 (Division A, Title X, Section 1079, November 18, 1997), no military flight operation (including military training flight), or designation of airspace for such an operation, may be treated as a transportation program or project for purposes of Section 303 of Title 49 USC. |
| Water Resources/<br>Floodplains/Wild and<br>Scenic Rivers                                                           | Military Training<br>Airspace                                         | This resource is not carried forward for detailed analysis for the military training airspace component because aircraft overflight does not involve ground disturbance, discharges, or other activities that could alter surface water, groundwater, floodplain function, or designated river resources beneath the airspace.                                                                                                                                                                                                                                                                                                                                                                                                             |
| Geological<br>Resources/Soils/<br>Farmlands                                                                         | Military Training<br>Airspace                                         | This resource is not carried forward for detailed analysis for the military training airspace component because aircraft overflight does not involve ground disturbance or soil-disturbing activities beneath the airspace.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Hazardous Materials<br>and Waste                                                                                    | Military Training<br>Airspace                                         | This resource is not carried forward for detailed analysis for the military training airspace component because aircraft overflight does not involve on-the-ground hazardous material use, storage, handling, or waste generation beneath the airspace.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Biological<br>Resources/Coastal<br>Resources/Wetlands                                                               | Installation (partial) and<br>Military Training<br>Airspace (partial) | Coastal resources are not present at the installation; therefore, coastal resources are not carried forward for detailed analysis. For the military training airspace, this resource is not carried forward for detailed analysis because no effect pathway exists. The Proposed Action would not result in new ground disturbance and activities such as chaff/flare and ordnance delivery would remain within authorized levels in existing use areas.                                                                                                                                                                                                                                                                                   |
| Visual Resources                                                                                                    | Military Training<br>Airspace                                         | This resource is not carried forward for detailed analysis for the military training airspace component because the Proposed Action would not create ground-level visual modifications beneath the airspace and overflight is intermittent and transitory.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Infrastructure/<br>Utilities/Natural<br>Resources and<br>Energy Supply/<br>Transportation/<br>Public Transportation | Military Training<br>Airspace                                         | This resource is not carried forward for detailed analysis for the military training airspace component because aircraft overflight does not change utility demand, transportation networks, or public services on the ground beneath the airspace.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

*Legend:* ANG = Air National Guard; ANGB = Air National Guard Base; DOT = Department of Transportation;  
LMT = Crater Lake-Klamath Regional Airport; USC = United States Code.

*Sources:* FAA 2025a.



### **3.1.2 Reasonably Foreseeable Actions and Environmental Trends**

The evaluation considers the reasonably foreseeable environmental effects of the Proposed Action and the No Action Alternative. “Reasonably foreseeable” refers to effects that are sufficiently likely to occur and have a clear causal relationship to the Proposed Action. Based on a review of available information regarding planned activities in and surrounding the project area, no other actions have been identified that are reasonably certain to occur and sufficiently related in time, location, or nature to warrant consideration in the analysis of the Proposed Action. Therefore, no reasonably foreseeable actions are identified for consideration in the effects analysis.

Resource analyses focus on effects attributable to the Proposed Action and, under the No Action Alternative, the environmental conditions expected to persist in the absence of the Proposed Action. The analyses also consider relevant environmental trends that could affect existing conditions or the environmental baseline during the period of analysis. Where feasible, the analysis uses quantifiable information; where data are not available, the analysis is qualitative. Because no other reasonably foreseeable actions have been identified, the analysis does not make assumptions regarding the environmental effects of future actions or rely on environmental analyses prepared for other projects.

### **3.1.3 Irreversible and Irretrievable Commitment of Resources**

Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects the uses of these resources have on future generations. Irreversible effects primarily result from the use or destruction of a specific resource (e.g., energy and minerals) that cannot be replaced within a reasonable timeframe. Building construction material such as gravel and gasoline usage for construction equipment would constitute the consumption of nonrenewable resources. Irretrievable resource commitments also involve the loss in value of an affected resource that cannot be restored as a result of the action.

Training operations would involve consumption of nonrenewable resources, such as gasoline used in vehicles and jet fuel used in aircraft. Use of training ordnance would involve commitment of chemicals and other materials. None of these activities would be expected to substantially affect environmental resources because the relative consumption of these materials is expected to change negligibly.

The primary irretrievable effects of implementation of any of the alternatives would involve the use of energy, labor, materials and funds, and the conversion of some lands from an undeveloped condition through the construction of buildings and facilities on the base. Irretrievable effects would occur as a result of construction, facility operation, and maintenance activities. Losses of biological productivity and the use of natural resources from these effects would be inconsequential.

## **3.2 NOISE**

### **3.2.1 Affected Environment**

This EIS evaluates aircraft noise impacts on noise-sensitive receptors and land uses in the study area. The noise analysis was conducted using applicable DAF and FAA guidance for environmental noise assessment and aviation noise compatibility analysis, including DAF

Handbook 32-7084, FAA Order 1050.1G, and FAA noise compatibility planning guidance, as applicable. Modeling results and supporting analyses are documented in the *Final Noise Study*, and noise modeling methods are summarized in *Noise Modeling, Methodology, and Noise Effects* (DAF 2026; NGB 2024b).

The ROI for noise includes LMT/Kingsley Field ANGB, and surrounding areas where aircraft operations and training activity contribute to the noise environment. Aircraft operations are the predominant source of noise; other sources (e.g., construction, ground support equipment, and roadway traffic) contribute intermittently. Background noise in areas surrounding the ANG local airspace is generally associated with rural and natural settings (e.g., wind and agricultural equipment).

### 3.2.1.1 Installation

Historically, the 173 FW served as an FTU for F-15C/D pilots, with an annual training target of 55 pilots per year. Due to aging aircraft and associated maintenance limitations, the 173 FW generated fewer operations in recent years. For Existing Conditions (2023) noise modeling, FY 2023 airfield activity was based on a reduced training pattern of 8 aircraft for the first launch and 6 aircraft for the second launch of each day (14 sorties per day). Factoring in 260 weekdays per year and after accounting for holidays and weather, this results in 3,360 annual sorties (13,440 annual airfield operations). Each sortie generates one departure, one arrival, and an average of one closed pattern event at LMT. The day and night periods used for the Day-Night Average Sound Level (DNL) metric are 7 a.m.–10 p.m. (0700–2200) and 10 p.m.–7 a.m. (2200–0700), respectively. These distributions reflect the Existing Conditions (2023) dataset used for modeling and provide a reference for comparing the Proposed Action and No Action alternatives; they are not intended to describe current-day fighter operations (DAF 2026).

As discussed in the 2020 *Adversary Air (ADAIR) Environmental Assessment* (EA), a private contractor began providing adversary training sorties in 2021 utilizing the F-5E/F aircraft. Although the ADAIR EA analyzed up to 2,000 annual sorties, the current contract provides for 800 sorties per year resulting in 1,760 annual ADAIR operations at LMT/Kingsley Field ANGB (DAF 2020a).

Transient military and USFS aircraft operations total 1,638 operations per year, based upon the 2020 *ADAIR EA* with applicable updates (DAF 2020a). Sentry Eagle is the largest multi-unit military exercise and lasts approximately 2 weeks. Visiting aircraft from multiple units nationwide participate, providing instructor pilots at LMT/Kingsley Field ANGB an opportunity to train in large-force air-to-air exercises with aircraft across the DoW inventory. Sentry Eagle and USFS operations are expected to continue at approximately the same overall rate under Existing Conditions (2023). Updates include revised aircraft-type participation ratios for Sentry Eagle (increased F-35A participation and decreased F-15 and F-16 participation compared to the 2020 *ADAIR EA*) and the addition of four annual C-17 operations not included in the 2020 operations (DAF 2026).

The FAA TAF contains historical and forecast data for enplanements, airport operations, Terminal Radar Approach Control operations, and based aircraft at FAA towered airports, FAA contract tower airports, Terminal Radar Approach Control facilities, and non-FAA airports. The FAA 2023 TAF issued in January 2024 summarizes annual operations by calendar year; calendar year 2023

corresponds to Existing Conditions for this analysis. The most common modeled civil aircraft types include the CNA208 (representing Cessna 208 Caravan and similar), DHC6 (representing DeHavill and DHC-6-300 Twin Otter and similar), and 1900D (representing Raytheon Beech 1900-C/D, BAE Jetstream 1, and BAE Jetstream 200 Series). Additional details on the modeled civil fleet mix are provided in the *Final Noise Study* (DAF 2026; FAA 2024a).

The noise analysis reviewed a year of LMT flight track data from the Performance Data Analysis and Reporting System (PDARS), which was obtained from the FAA in 2021. Upon review of the PDARS data, FAA determined that the FAA's 2022 National Noise Inventory represented a better data source from which to derive the civilian fleet mix of operations at LMT, and FAA provided this data source for use in the noise analysis. A review of the 2019 PDARS data also identified the need to model flight tracks for civilian aircraft between Runways 14/32, flight tracks to the practice area southwest of the airfield, and closed pattern operations for all runways (DAF 2026; FAA 2024b; LMT 2024).

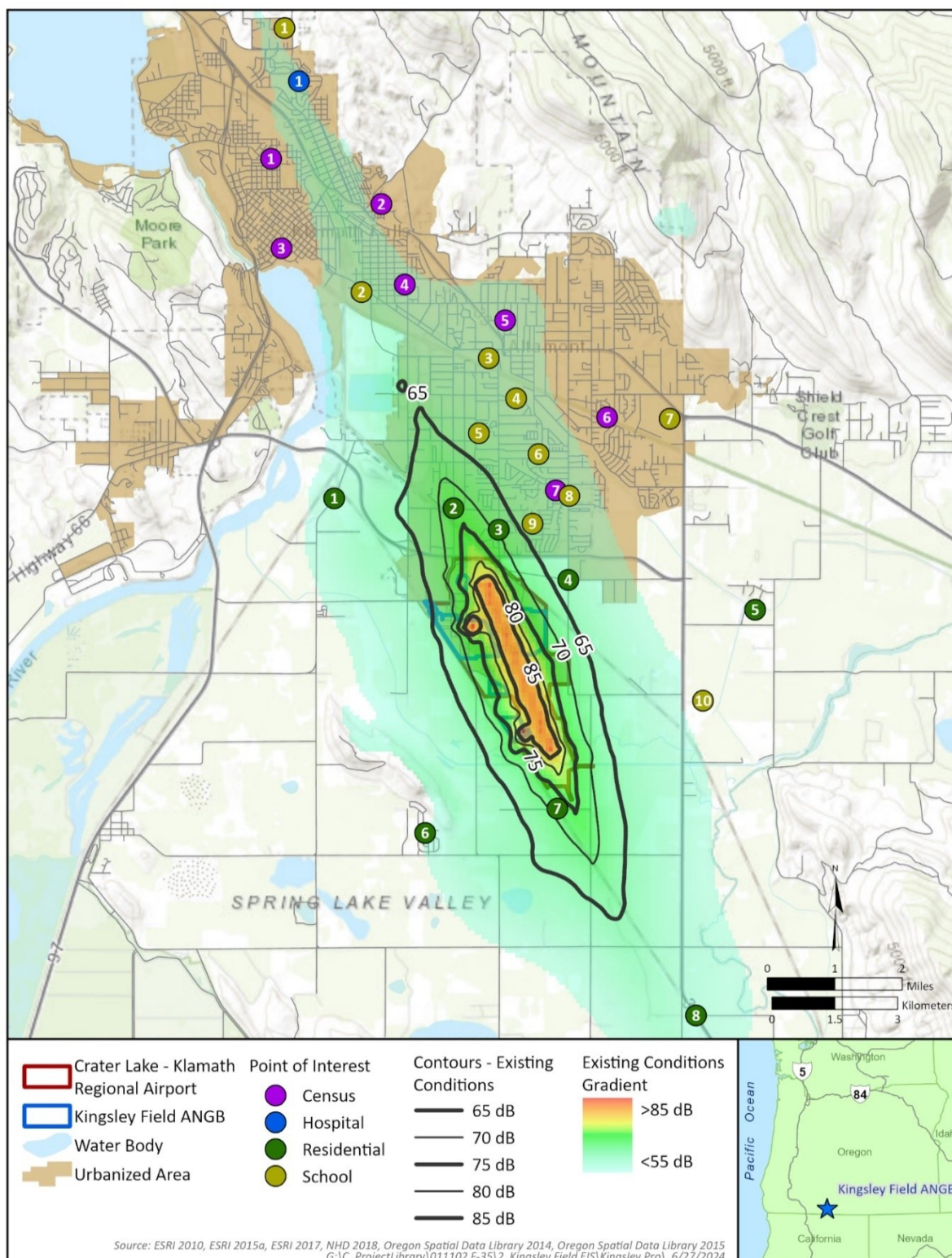
Consistent with applicable DAF and FAA guidance for environmental noise assessment and aviation noise compatibility analysis, the installation noise analysis used standard aircraft noise modeling tools and metrics to evaluate community noise exposure and land use compatibility.

For the noise analysis, the DoD's Noisemap software suite and FAA's Aviation Environmental Design Tool (AEDT) were used to model aircraft operations, taking into account flight tracks, altitude, airspeed, power settings, and other relevant flight conditions. The analysis was refined using weather data (temperature, relative humidity, and barometric pressure) from 2018–2023, sourced from the US Geological Survey National Elevation Dataset and Hydrography data. The combination of Noisemap and AEDT modeling results was used to present noise exposure in terms of DNL contours ranging from 65 dB to 85 dB in 5-dB increments, with specific noise-sensitive locations (e.g., schools, hospitals, and residential areas) identified as Points of Interest (POIs) (DAF 2026; NGB 2024b).

Figure 3.2-1 shows Existing Conditions (2023) DNL noise contours at LMT from 65 to 85 dB in 5-dB increments overlaid on gradient mapping of DNL by color shading (DAF 2026). Portions of the DNL 65 dB contour extend north of the airfield by 1.8 miles, to the east and to the west 0.3 mile, and to the south 1.6 miles. The gradient depicts lower DNL levels beyond the DNL 65 dB contour (plotted to DNL 55 dB) (DAF 2026).

Modeled DNL values at POIs under the Existing Conditions (2023) range from DNL 45 to 74 dB. Three residential POIs (R-02 Anderson Avenue and Altamont Drive, R-03 Highland Way and Summit Street, and R-07 Lombardy Lane and railroad tracks) are exposed to DNL 65 dB or greater, which is the DoD threshold for land use recommendations applicable to noise sensitive land uses (DAF 2026; DoD 2021).

Noise exposure acreage under Existing Conditions (2023) is summarized in Section 3.2.2. Approximately 2,789 acres adjacent to LMT are exposed to DNL 65 dB or greater (DAF 2026).



**Figure 3.2-1 Existing Conditions (2023) DNL Contours and Noise Gradients on and Adjacent to LMT**

Household and population estimates were derived from census block groups data using the methodology documented in the *Final Noise Study* (DAF 2026). Under Existing Conditions (2023), an estimated 746 households/1,851 people occur in the DNL 65 to 70 dB band, 336 households/834 people within the DNL 70 to 75 dB band, and 106 households/262 people within the DNL 75 to 80 dB band. No households occur in the DNL 80 to 85 dB band; this was confirmed using aerial imagery. DNL 80 dB also serves as the potential for hearing loss screening threshold (DAF 2026).

Supplemental noise metrics were evaluated in accordance with DoD policy to assess potential effects on schools, other POIs, sleep disturbance, and potential for hearing loss (DoD Noise Working Group [DNWG] 2009). For schools, the screening threshold is 60 dB 8-hour equivalent sound level ( $L_{eq(8hr)}$ ) (equivalent to an interior noise level of 45 dB  $L_{eq(8hr)}$  with windows open), which is the level at which studies have found classroom learning to be affected (DNWG 2009, 2013). Under Existing Conditions (2023), seven schools exceed this threshold, with the highest modeled  $L_{eq(8hr)}$  at S-09 Hosanna Christian School (67 dB). Speech-interfering events and time above the interior 50 dB threshold occur at multiple schools, ranging from 1 to 4 events and 3 to 13 minutes per average school day; detailed classroom interference metrics are documented in the *Final Noise Study* (DAF 2026).

Non-school speech interference was evaluated at all POIs during the DNL daytime period under windows-open and windows-closed conditions. Under Existing Conditions (2023), speech-interfering events with windows open range from 1 to 5 events per average hour. With windows closed, 7 POIs experience no interfering events per average hour, 12 POIs experience 1 event per average hour, and 7 POIs experience 2 to 3 events per average hour. The highest windows-closed rate (3 events per average hour) occurs at R-02 Anderson Avenue and Altamont Drive, R-03 Highland Way and Summit Street, and R-07 Lombardy Lane and railroad tracks (DAF 2026).

Sleep disturbance was evaluated using the probability of awakening (PA) metric, based on nighttime aircraft events and associated sound exposure levels (SELs). Under Existing Conditions (2023), PA with windows open is less than 1 percent at 5 POIs, 1 to 5 percent at 20 POIs, and 10 percent at 1 POI. With windows closed, PA with windows closed is less than 1 percent at 14 POIs, 1 to 5 percent at 11 POIs, and 6 percent at one POI (DAF 2026).

A small number of nighttime operations by the 173 FW F-15C/D aircraft (approximately 25 operations per month) were included in the Existing Conditions (2023); PA results are dominated by civil aircraft operations.

DoW guidance also prescribes screening for the potential for hearing loss (PHL) due to elevated aircraft noise levels. Screening begins by identifying residential areas exposed to DNL of 80 dB or greater (DNWG 2026). Under Existing Conditions (2023), approximately 5 acres outside of LMT are exposed to 80 dB or greater, and no households or residents occur within those areas. Because no people reside in areas exposed to DNL 80 dB or greater, no additional PHL analysis is warranted for Existing Conditions (2023) (DAF 2026; DNWG 2026).

#### 3.2.1.2 Military Training Airspace

As depicted in Figure 2.1-4, the 173 FW utilizes both overland and overwater military training airspace. Under Existing Conditions (2023), F-15C/D training primarily occurred in Juniper/Hart and Goose MOAs to the east of LMT/Kingsley Field ANGB, with occasional use of the Dolphin MOA along the Oregon coast.

Table 3.2-1 summarizes annual military training airspace operations used in the noise model for Existing Conditions (2023). An “operation” refers to a single flight event conducted within military training airspace and may include multiple activities (e.g., transits through multiple airspace areas, changes in altitude, holding patterns, or transitions between MOAs). Because multiple airspace-related activities may occur during one flight mission, the number of operations does not necessarily correspond one-to-one with sorties, which describe the overall flight mission.

**Table 3.2-1 Existing Conditions (2023) Military Training Airspace Annual Operations**

| <i>Aircraft</i> | <b>Juniper/Hart</b> |              | <b>Dolphin</b> |              | <b>Goose</b> |              | <b>Total Operations</b> |              |              |
|-----------------|---------------------|--------------|----------------|--------------|--------------|--------------|-------------------------|--------------|--------------|
|                 | <i>Day</i>          | <i>Night</i> | <i>Day</i>     | <i>Night</i> | <i>Day</i>   | <i>Night</i> | <i>Day</i>              | <i>Night</i> | <i>Total</i> |
| F-15C/D         | 1,495               | 46           | 71             | 3            | 1,531        | 48           | 3,097                   | 97           | 3,194        |
| F-5E (ADAIR)    | 740                 | 23           | 36             | 1            | 0            | 0            | 776                     | 24           | 800          |
| Other Mil       | 252                 | 0            | 0              | 0            | 0            | 0            | 252                     | 0            | 252          |
| <b>Total</b>    | <b>2,487</b>        | <b>69</b>    | <b>107</b>     | <b>4</b>     | <b>1,531</b> | <b>48</b>    | <b>4,125</b>            | <b>121</b>   | <b>4,246</b> |

*Note:* Values reflect the Existing Conditions (2023) dataset used for noise modeling and are not intended to describe current-day 173 FW fighter operations.

*Legend:* ADAIR = Adversary Air; ANG = Air National Guard.

Data collected by the 173 FW indicate approximately 3,194 annual F-15C/D military training airspace operations under Existing Conditions (2023) (NGB 2024c). In addition, F-5E aircraft conduct adversary training within the Juniper/Hart and Dolphin MOAs, generating approximately 800 operations per year (NGB 2024c). The W-93 overwater airspace, located approximately 15 miles offshore, is used for training but does not affect noise-sensitive land receptors and was not included in the noise modeling (DAF 2026).

The DNL and Onset-Rate Adjusted Day-Night Average A-weighted Sound Level ( $L_{dnmr}$ ) metrics are used to quantify noise in military training airspace.  $L_{dnmr}$  includes a rise-time correction factor to account for the increased annoyance associated with high-speed aircraft at low altitudes. Because most training occurs above 10,000 feet MSL, rise-time effects are small, and DNL and  $L_{dnmr}$  are the same for Existing Conditions (2023) when rounded to whole decibels.

Under Existing Conditions (2023), the greatest calculated noise levels occur in Juniper Low and Juniper East Low MOAs (48 dB DNL/ $L_{dnmr}$ ), reflecting the lower military training airspace floor and lower altitudes flown in these areas. The remainder of the Juniper/Hart complex outside of the Juniper Low and Juniper East Low MOAs is 35 dB or less. Goose North and Goose South MOAs are 45 dB. Dolphin North and South MOAs are less than 35 dB, reflecting relatively few operations distributed over a large area and a minimum altitude of 11,000 feet MSL (DAF 2026).

Airspace management across the 173 FW training area incorporates civil aviation deconfliction protocols established in both the 2017 *Environmental Impact Statement for Proposed Establishment and Modification of Oregon Military Training Airspace (Oregon Airspace EIS; NGB 2017)* and the 2023 *Airspace Optimization for Readiness for Mountain Home Air Force Base Environmental Impact Statement (Mountain Home Airspace EIS; DAF 2023a)*. These procedures were formally adopted in the respective Records of Decision (RODs) for both actions. They include avoiding low-altitude overflights of noise-sensitive areas to the maximum extent practicable and maintaining current avoidance protocols for identified noise-sensitive locations beneath the Juniper Low and Juniper East Low MOAs. Air Combat Maneuvering involves offensive and defensive maneuvering that may involve reaching supersonic speeds. Under Existing Conditions (2023), approximately 75 percent of military training airspace sorties include some supersonic flight; however, supersonic duration is short and ranges from 2 to 10 minutes for



F-15C/D aircraft (DAF 2026). Supersonic noise was evaluated using BOOMAP2021, which allows modeling of supersonic activity using aircraft type, altitude bands, Mach number, duration, and ground elevation inputs (DAF 2026). For analysis purposes, Air Combat Maneuvering events within the Juniper/Hart MOA complex, analyzed events for both F-15C/D and F-5E adversary operations were assumed to include supersonic flight for a portion of the training event, including both F-15C/D and F-5E adversary operations. Results indicate a maximum C-weighted Day-Night Average Sound Level (CDNL) of approximately 39 C-weighted decibels (dBC), occurring near the center of the Juniper/Hart MOA complex. The relatively low CDNL value is primarily attributable to the 30,000-foot MSL minimum altitude floor for supersonic operations within the Juniper Hart MOA Complex (DAF 2026).

### **3.2.2 Environmental Consequences**

Noise modeling methods, assumptions, metrics, and significance frameworks used for this analysis are documented in *Noise Modeling, Methodology, and Noise Effects* and the *Final Noise Study* (DAF 2026; NGB 2024b). This analysis applies applicable DAF and FAA guidance for environmental noise assessment and aviation noise compatibility analysis, including DAF Handbook 32-7084, FAA Order 1050.1G, and FAA noise compatibility planning guidance, as applicable.

#### **3.2.2.1 No Action Alternative**

##### *Installation*

Under the No Action Alternative, 173 FW F-15C/D operations are modeled as a reduced training pattern of 6 aircraft for the first launch and 4 aircraft for the second launch of each day (10 sorties per day). This equates to approximately 2,400 annual sorties or 9,600 annual operations, representing an approximate 29 percent reduction from Existing Conditions (2023) (DAF 2026). Contract ADAIR operations, military transient operations, and other agency transient operations are assumed to remain consistent with Existing Conditions (2023) (DAF 2026).

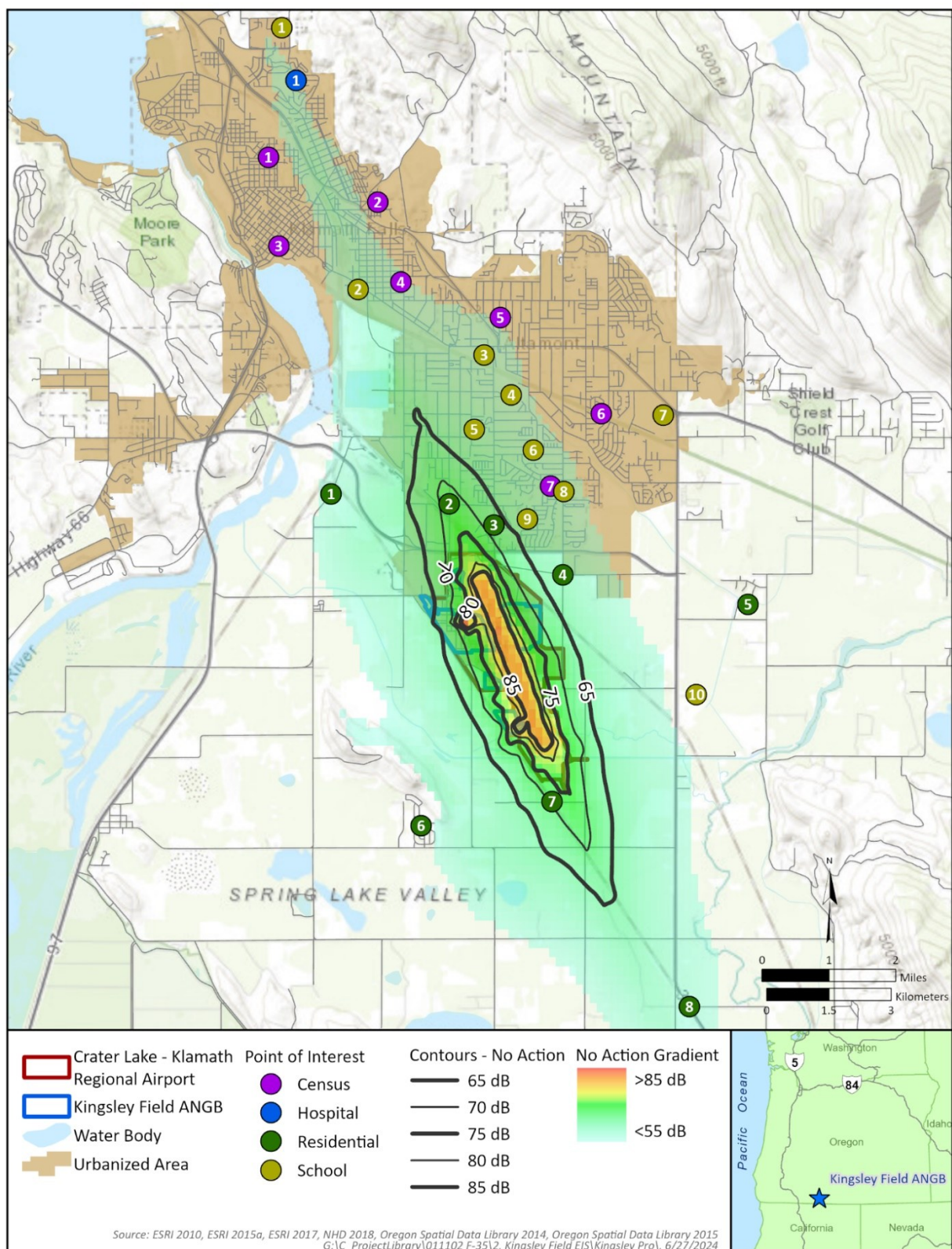
Civil aircraft operations at LMT are based on the FAA 2023 TAF and are estimated at approximately 26,102 annual operations, representing an increase of approximately 8 percent from Existing Conditions (2023). The analysis assumes that the civil fleet mix for 2029 would not change from the Existing Conditions (2023).

Maintenance and ground run-up operations by F-15C/D were scaled proportional to the modeled reduction in F-15C/D flight operations, while all other military or other agency ground operations would remain consistent with Existing Conditions (2023) (DAF 2026).

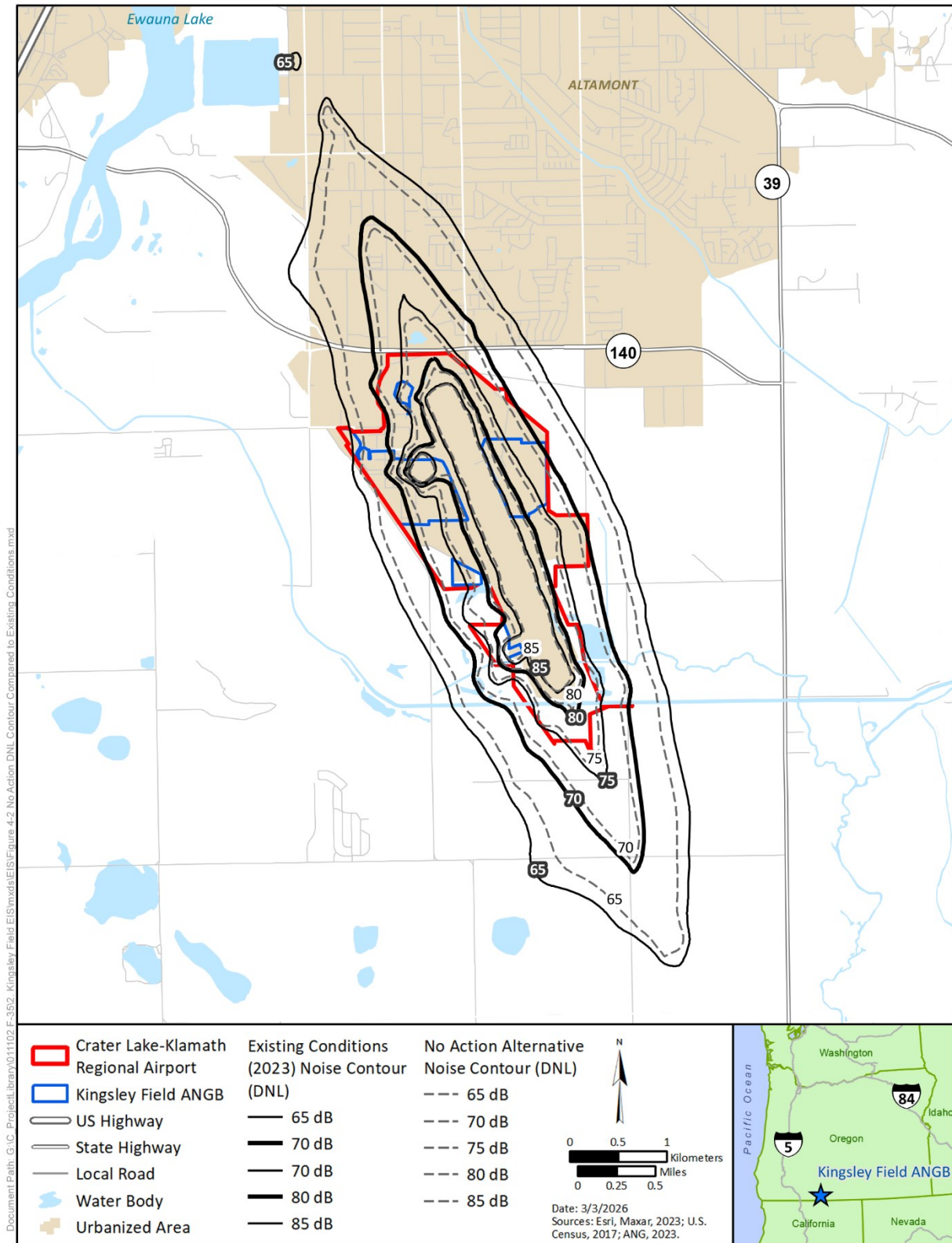
Figure 3.2-2 depicts DNL contours (65 to 85 dB in 5-dB increments) for the No Action Alternative at LMT, overlaid on a color gradient representation of DNL. Under the No Action Alternative, portions of the DNL 65 dB contour extend approximately 1.7 miles north of the airfield, approximately 0.2 mile to the east and west, and approximately 1.5 miles to the south (DAF 2026).

As shown in Figure 3.2-3, compared to Existing Conditions (2023), the No Action Alternative results in an overall reduction in the extent of the DNL contours (approximately a 1 to 2 dB reduction) driven by the modeled reduction in 173 FW fighter operations under the No Action Alternative assumptions (DAF 2026).





**Figure 3.2-2 No Action Alternative DNL Contours and Noise Gradients on and Adjacent to LMT**



**Figure 3.2-3 No Action Alternative DNL Contour Comparison to Existing Conditions (2023) at LMT**

Modeled DNL values at POIs under the No Action Alternative range from DNL 46 to 73 dB (DAF 2026). Three residential POIs (R-02 Anderson Avenue and Altamont Drive, R-03 Highland Way and Summit Street, and R-07 Lombardy Lane and railroad tracks) would experience DNL 65 dB or greater, consistent with the Existing Conditions (2023) (Table 3.2-2). Compared to Existing Conditions (2023), DNL would remain unchanged at 2 POIs, decrease by 1 dB at 20 POIs, and decrease by 2 dB at 4 POIs.

**Table 3.2-2 POI’s Experiencing > DNL 65 dB Under Existing Conditions (2023) and the No Action Alternative**

| <i>POI ID</i> | <i>Location Description</i>        | <i>Existing Conditions<br/>(2023) DNL (dB)</i> | <i>No Action<br/>DNL (dB)</i> | <i>Change in<br/>DNL (dB)</i> |
|---------------|------------------------------------|------------------------------------------------|-------------------------------|-------------------------------|
| R-02          | Anderson Avenue and Altamont Drive | 74                                             | 73                            | -1                            |
| R-03          | Highland Way and Summit Street     | 69                                             | 68                            | -1                            |
| R-07          | Lombardy Lane and Railroad Tracks  | 72                                             | 71                            | -1                            |

*Legend:* > = greater than; dB = decibel; DNL = Day-Night Average Sound Level; ID = Identification; POI = Point of Interest.

Noise exposure acreage (excluding water bodies) under the No Action Alternative is summarized in Table 3.2-3, including the change relative to Existing Conditions (2023). Acreage values reflect the datasets used for comparative analysis and are not intended to describe current-day operational conditions. Under the No Action Alternative, approximately 2,177 acres adjacent to LMT would be exposed to DNL 65 dB or greater (DAF 2026).

**Table 3.2-3 No Action Alternative – Noise Exposure Acreage**

| <i>DNL Band<br/>(dB)</i> | <i>No Action Acreage</i> |                            |              | <i>Change Relative to Existing<br/>Conditions (2023)</i> |                            |              |
|--------------------------|--------------------------|----------------------------|--------------|----------------------------------------------------------|----------------------------|--------------|
|                          | <i>On LMT</i>            | <i>Adjacent to<br/>LMT</i> | <i>Total</i> | <i>On LMT</i>                                            | <i>Adjacent to<br/>LMT</i> | <i>Total</i> |
| 65–70                    | 133                      | 1,558                      | 1,691        | 49                                                       | -392                       | -343         |
| 70–75                    | 284                      | 529                        | 813          | 18                                                       | -150                       | -132         |
| 75–80                    | 335                      | 89                         | 423          | -1                                                       | -66                        | -66          |
| 80–85                    | 204                      | 2                          | 205          | -33                                                      | -4                         | -37          |
| 85+                      | 279                      | -                          | 279          | -42                                                      | 0                          | -42          |
| <b>Total &gt;65dB</b>    | 1,234                    | 2,177                      | 3,412        | -9                                                       | -612                       | -621         |

*Note:* Totals may not add due to rounding.

*Legend:* > = greater than; dB = decibel; DNL = Day-Night Average Sound Level; LMT = Crater Lake-Klamath Regional Airport.

Estimated household and population exposure was calculated using the methodology documented in the *Final Noise Study* (DAF 2026). Under the No Action Alternative, an estimated 588 households/1,459 people would be exposed within the DNL 65–70 dB band, 300 households/744 people within the DNL 70–75 dB band, and 58 households/145 people within the DNL 75–80 dB band. Aerial imagery confirmed no households or residents occur within the DNL 80–85 dB band; therefore, no individuals would be affected within that band (DAF 2026).

Classroom learning interference results for schools S-01 through S-10 under the No Action Alternative are summarized in Table 3.2-4. Seven schools exceed the 60 dB  $L_{eq(8hr)}$  screening threshold, and the highest modeled  $L_{eq(8hr)}$  is 65 dB at S-05 Stearns Elementary School and S-09 Hosanna Christian School (DAF 2026).

**Table 3.2-4 LMT No Action Alternative – Classroom Learning Interference**

| <b>ID</b> | <b>Location<sup>1</sup></b> | <b>Outdoor<br/><i>L<sub>eq</sub></i>(8hr)<br/>(dB)<sup>2</sup></b> | <b>Change<br/>Outdoor<br/><i>L<sub>eq</sub></i>(8hr) dB<br/>Relative to<br/>Existing</b> | <b>Number of<br/>Speech<br/>Interfering<br/>Events per<br/>School Day<br/>Hour<sup>3</sup></b> | <b>Change<br/>Events per<br/>School Day<br/>Hour<br/>Relative to<br/>Existing</b> | <b>TA interior<br/>50 dB per 8-<br/>hour school<br/>day<br/>(minutes)<sup>3</sup></b> | <b>Change TA<br/>Relative to<br/>Existing</b> |
|-----------|-----------------------------|--------------------------------------------------------------------|------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------------------------|
| S01       | Oregon Institute of Tech    | 57                                                                 | 0                                                                                        | 1                                                                                              | 0                                                                                 | 3                                                                                     | 0                                             |
| S02       | Klamath Family Head Start   | <b>62<sup>2</sup></b>                                              | -1                                                                                       | 2                                                                                              | 0                                                                                 | 4                                                                                     | 0                                             |
| S03       | Triad School                | <b>61<sup>2</sup></b>                                              | -1                                                                                       | 2                                                                                              | 0                                                                                 | 3                                                                                     | -1                                            |
| S04       | Mazama High School          | <b>60<sup>2</sup></b>                                              | -2                                                                                       | 2                                                                                              | 0                                                                                 | 3                                                                                     | -1                                            |
| S05       | Stearns Elementary School   | <b>65<sup>2</sup></b>                                              | -1                                                                                       | 2                                                                                              | -1                                                                                | 4                                                                                     | -1                                            |
| S06       | Peterson Elementary         | <b>62<sup>2</sup></b>                                              | -1                                                                                       | 2                                                                                              | -1                                                                                | 5                                                                                     | -2                                            |
| S07       | Klamath Community College   | 51                                                                 | -1                                                                                       | 1                                                                                              | -1                                                                                | 5                                                                                     | -1                                            |
| S08       | Brixner Junior High School  | <b>61<sup>2</sup></b>                                              | -1                                                                                       | 2                                                                                              | -1                                                                                | 7                                                                                     | -2                                            |
| S09       | Hosanna Christian School    | <b>65<sup>2</sup></b>                                              | -2                                                                                       | 3                                                                                              | -1                                                                                | 10                                                                                    | -3                                            |
| S10       | Henley High School          | 56                                                                 | -1                                                                                       | 2                                                                                              | 0                                                                                 | 6                                                                                     | -2                                            |

Notes: <sup>1</sup>Table presents the analysis for the school POIs.

<sup>2</sup>Bold text represents schools exposed to exterior *L<sub>eq</sub>*(8hr) of greater than 60 dB, equivalent to the recommended interior threshold of 45 dB with windows open.

<sup>3</sup>Assumes 90 percent of ANG daytime operations occur during the school day; windows open condition with Noise Level Reduction of 15 dB due to building attenuation.

Legend: LMT = Crater Lake-Klamath Regional Airport; dB = decibel; ID = Identification; *L<sub>eq</sub>*(8hr) = 8-hour Equivalent Sound Level; POI = Point of Interest; TA= Time above.

In addition to classroom metrics, non-school speech interference was evaluated at all POIs during the DNL daytime period under windows-open and windows-closed conditions. With windows open, speech-interfering events range from 1 to 5 events per average hour, and 12 POIs experience a reduction of one event per hour under the No Action Alternative. With windows closed, 13 POIs experience zero events per average hour, 10 POIs experience 1 event per average hour, and 3 POIs experience 2 events per average hour (DAF 2026).

Sleep disturbance was evaluated using the PA metric. With windows open, PA is less than 1 percent at 11 POIs and ranges from 1 to 10 percent at 15 POIs. With windows closed, PA is less than 1 percent at 20 POIs and ranges from 1 to 6 percent at 6 POIs. Nighttime 173 FW F-15C operations are limited under No Action assumptions (approximately 18 operations per month), and PA results are dominated by civil aircraft activity (DAF 2026).

The Potential for hearing loss screening indicates that only 2 acres outside LMT are exposed to DNL 80 dB or greater under the No Action Alternative, and no households or residents occur within those areas. Because these areas are unoccupied, no additional hearing loss analysis is warranted for the No Action Alternative (DAF 2026).

### Military Training Airspace

Under Existing Conditions (2023), F-15C/D training primarily utilized Juniper/Hart and Goose MOAs, with occasional use of the Dolphin MOA. Under the No Action Alternative, this utilization pattern would continue with an overall reduction of approximately 26 percent in military training airspace activity.

DNL and *L<sub>dnmr</sub>* were used to characterize noise exposure within the military training airspace. Because most training occurs above 10,000 feet MSL, the rise-time adjustment applied to *L<sub>dnmr</sub>* does not produce a measurable difference from DNL when rounded to whole decibels (DAF 2026).



Under the No Action Alternative, the highest DNL/ $L_{dnmr}$  values occur in the Juniper Low and Juniper East Low MOAs (47 dB) due to the lower floor and lower altitudes flown in these areas. Goose North and Goose South are 44 dB, and Dolphin North and South remain less than 35 dB, reflecting relatively few operations distributed over a large area and a minimum altitude of 11,000 feet MSL. Overall, DNL/ $L_{dnmr}$  across the military training airspace decreases by approximately 1 dB compared to Existing Conditions (2023) (DAF 2026).

Supersonic operations remain confined to the Juniper/Hart MOA complex at or above 30,000 feet MSL to minimize potential supersonic noise effects at ground level, but would occur at a reduced number of annual events under No Action assumptions. Supersonic noise modeling indicates a maximum CDNL of 36 dBC near the center of the Juniper/Hart MOA complex. The CDNL remains relatively low primarily due to the 30,000-foot MSL minimum altitude requirement for supersonic operations (DAF 2026).

### 3.2.2.2 Proposed Action Alternative

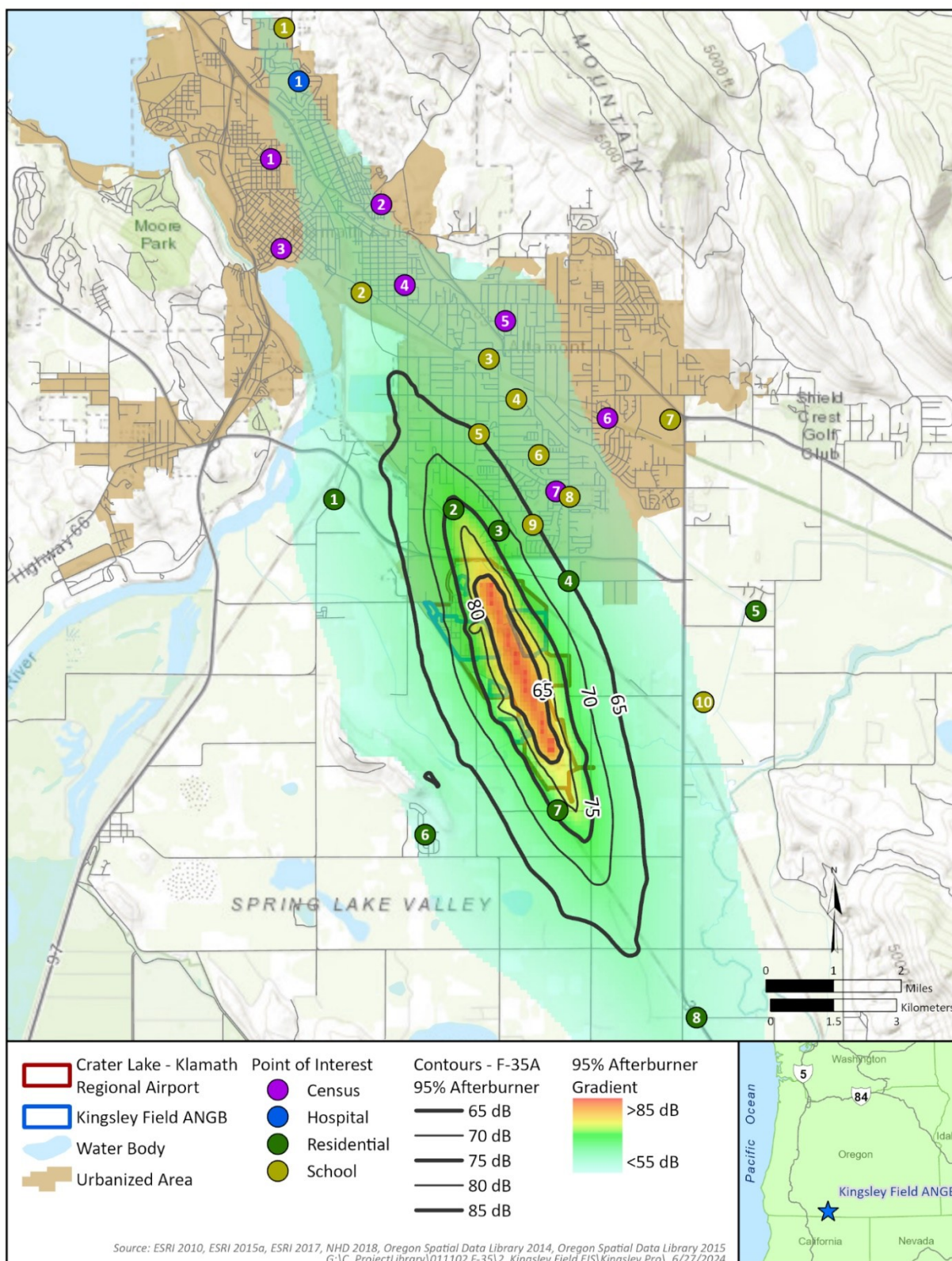
Under the Proposed Action, one F-35A FTU squadron would replace the F-15C/D aircraft previously assigned to the 173 FW at Kingsley Field ANGB and would conduct training operations in associated military training airspace. This alternative would also include construction to support F-35A operations at LMT/Kingsley Field ANGB, which would generate temporary construction noise. Construction would occur on installation near the LMT runways within areas already exposed to DNL 65 dB or greater under Existing Conditions (2023), and adjacent land uses are primarily commercial or agricultural. Construction noise would be temporary and localized and would not be expected to affect noise-sensitive receptors; therefore, additional construction noise analysis is not warranted (DAF 2026).

#### Installation

Modeled annual airfield operations at LMT/Kingsley Field ANGB under the Proposed Action are summarized in Table 2.2-1. Under the Proposed Action, F-35A operations would total 20,780 annual operations, and total airfield operations at LMT/Kingsley Field ANGB would be 50,280 annually, compared to 39,100 under the No Action Alternative. Departures were modeled with afterburner use for 95 percent of F-35A departure operations, consistent with the FTU training profile (DAF 2026).

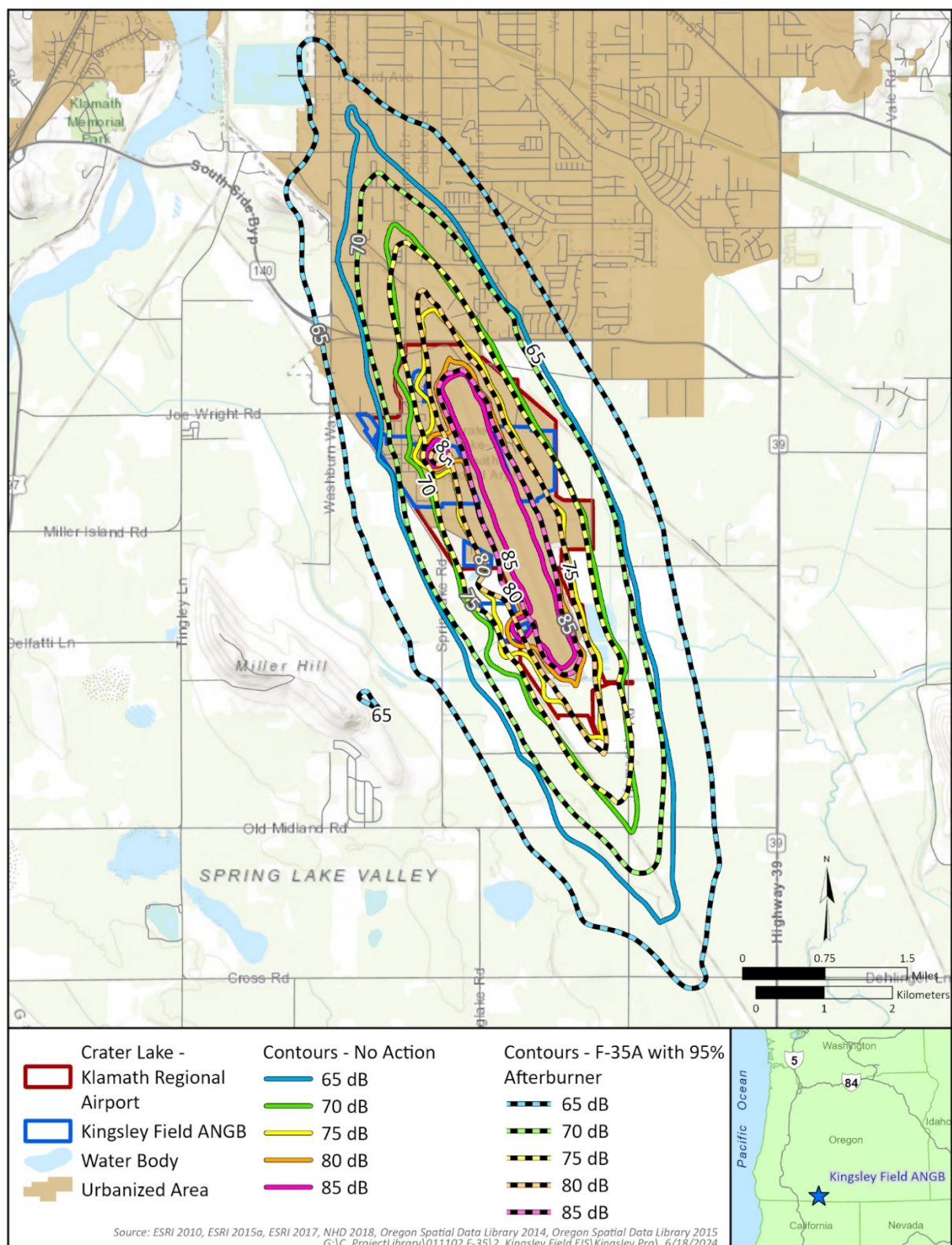
F-35A arrivals were modeled using the same arrival types at similar rates proportional to Existing Conditions (2023) F-15C/D operations, with closed patterns conducted only as required. Nighttime operations would remain low (approximately 2 percent of modeled operations). Runway use proportions would be consistent with Existing Conditions (2023) and the No Action Alternative: approximately 90 percent of departures on Runway 14 and approximately 90 percent of non-break arrivals, overhead break arrivals, and VFR closed patterns on Runway 32. Additional modeling assumptions (including maintenance and ground operations) are documented in the *Final Noise Study* (DAF 2026).

DNL contours for the Proposed Action (Figure 3.2-4) are presented from 65 to 85 dB in 5 dB increments. The DNL 65 dB contour extends approximately 2.2 miles north, 0.4 mile east, 0.5 mile west, and 2.0 miles south of the airfield. Compared to the No Action Alternative (Figure 3.2-5), the Proposed Action expands the contours in all directions due to the increased number of operations and higher modeled noise levels for the F-35A.



**Figure 3.2-4 Proposed Action F-35A DNL Contours and Gradient (95% Afterburner)**





**Figure 3.2-5 Proposed Action F-35A Comparison to No Action DNL Contours (95% Afterburner Departure Assumption)**



Afterburner provides additional thrust that allows the aircraft to accelerate quicker to begin to climb in a shorter distance after takeoff. For off-base areas near the airfield, the duration of noise exposure is strongly influenced by how long the aircraft remains at lower altitudes and close lateral distances to surrounding communities. An earlier climb reduces the time the aircraft spends in this low-altitude portion of the departure, which shortens the period during which off-base receptors are exposed to the highest departure noise levels. While afterburner can increase instantaneous sound levels during the initial takeoff segment, it can reduce the duration of off-base exposure by accelerating the aircraft's transition to higher altitudes where sound levels decrease with distance.

Table 3.2-5 summarizes POIs with DNL 65 dB or greater under the Proposed Action (F-35A 95% afterburner) and compares those results to the No Action Alternative. Under the Proposed Action, six POIs would be exposed to DNL 65 dB or greater, an increase of three POIs relative to the No Action Alternative. The highest modeled DNL is 77 dB at R-02 Anderson Avenue and Altamont Drive, followed by 76 dB at R-07 Lombardy Lane and railroad tracks. Overall, POI DNL increases by approximately 1 to 5 dB relative to the No Action Alternative. Detailed POI results for all afterburner scenarios are provided in the *Final Noise Study* (DAF 2026).

**Table 3.2-5 POIs at or above DNL 65 dB under the Proposed Action  
(F-35A 95% Afterburner)**

| <b>POI ID</b> | <b>Location</b>                    | <b>No Action DNL (dB)</b> | <b>Proposed Action DNL (dB)<br/>(F-35A 95% AB)</b> | <b>DNL (dB)</b> |
|---------------|------------------------------------|---------------------------|----------------------------------------------------|-----------------|
| R-02          | Anderson Avenue and Altamont Drive | 73                        | 77                                                 | +4              |
| R-03          | Highland Way and Summit Street     | 68                        | 73                                                 | +5              |
| R-04          | Airway Drive and Homedale Road     | 61                        | 65                                                 | +4              |
| R-07          | Lombardy Lane and railroad tracks  | 71                        | 76                                                 | +5              |
| S-05          | Stearns Elementary School          | 61                        | 65                                                 | +4              |
| S-09          | Hosanna Christian School           | 62                        | 66                                                 | +4              |

*Legend:* % = percent; AB = Afterburner; dB = decibel; DNL = Day-Night Average Sound Level; ID = Identification; POI = Point of Interest.

The number of POIs exposed to DNL 70 dB or greater would increase from two to three, and the number of POIs exposed to DNL 75 dB or greater would increase by two. Across all modeled POIs, DNL would increase by 1 dB at 2 POIs, by 2 to 4 dB at 21 POIs, and by 5 dB or more at 3 POIs.

Table 3.2-6 summarizes off-installation noise exposure adjacent to LMT by DNL band under the Proposed Action (F-35A 95% afterburner departures) and the change relative to the No Action Alternative. Under the Proposed Action, approximately 4,506 acres, 1,865 households, and 4,629 people adjacent to LMT would be exposed to DNL 65 dB or greater, increases of approximately 2,329 acres, 919 households, and 2,281 people relative to No Action. Because one household would occur within the DNL 80–85 dB band, PHL screening results are provided below.

**Table 3.2-6 Acreage, Households, and Estimated Population by DNL Contour  
Adjacent to LMT (Proposed Action and No Action Alternative)**

| <i>Scenario</i> | <i>DNL (dB)</i> | <i>Acreage<br/>Adjacent<br/>to LMT</i> | <i>Households</i> | <i>Estimated<br/>Population</i> | <i>Change from No Action Alternative</i> |                   |                                 |
|-----------------|-----------------|----------------------------------------|-------------------|---------------------------------|------------------------------------------|-------------------|---------------------------------|
|                 |                 |                                        |                   |                                 | <i>Acreage</i>                           | <i>Households</i> | <i>Estimated<br/>Population</i> |
| F-35A<br>95% AB | 65–70           | 2,788                                  | 1,190             | 2,953                           | +1,229                                   | +602              | +1,494                          |
|                 | 70–75           | 1,192                                  | 415               | 1,030                           | +663                                     | +115              | +286                            |
|                 | 75–80           | 435                                    | 259               | 643                             | +346                                     | +201              | +498                            |
|                 | 80–85           | 90                                     | 1                 | 3                               | +88                                      | +1                | +3                              |
|                 | 85+             | 2                                      | 0                 | 0                               | +2                                       | 0                 | 0                               |
|                 | <b>Total</b>    | <b>4,506</b>                           | <b>1,865</b>      | <b>4,629</b>                    | <b>+2,329</b>                            | <b>+919</b>       | <b>+2,281</b>                   |

*Note:* Totals may not add due to rounding.

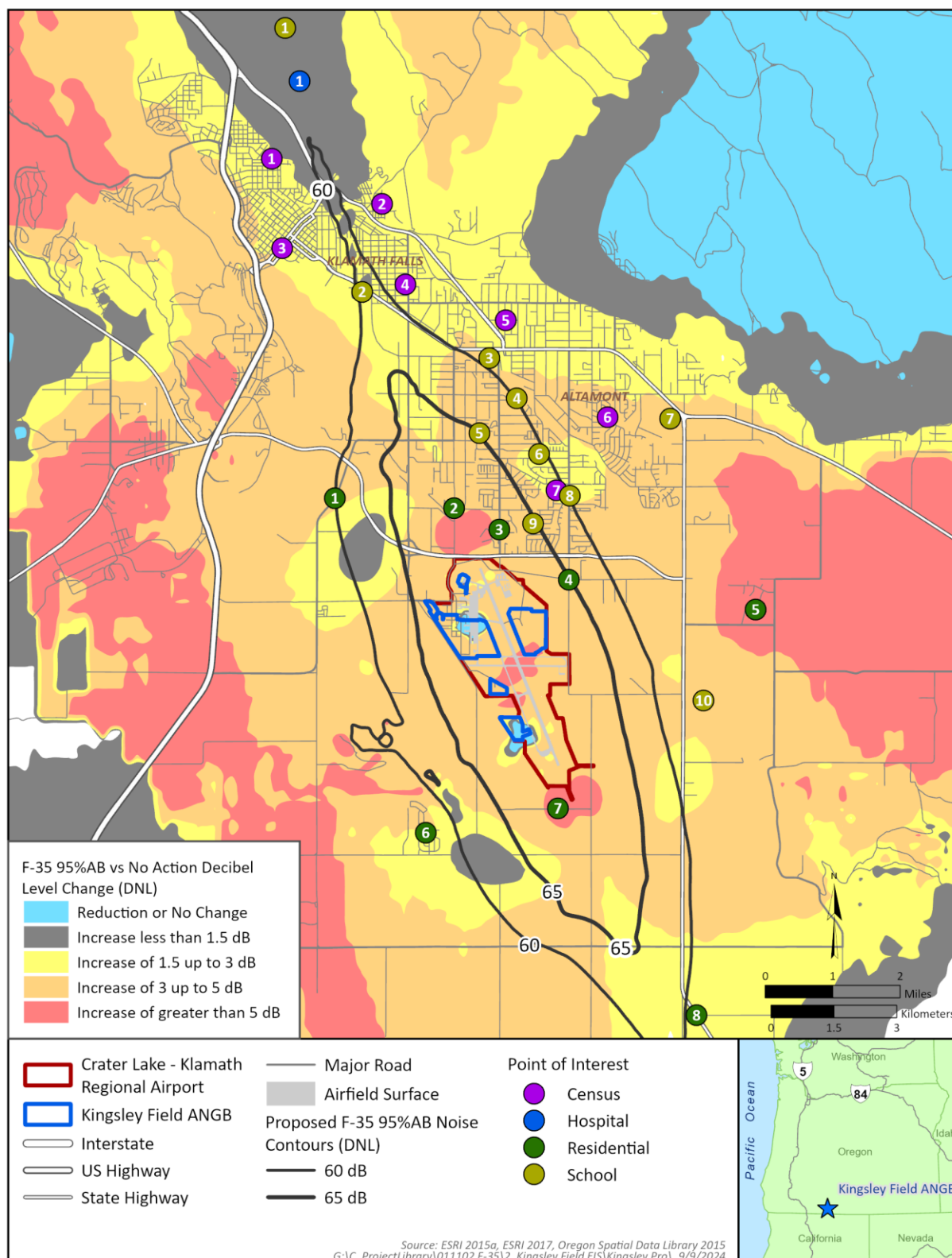
Households and population within the DNL 80 dB and greater determined through review of aerial imagery.

*Legend:* % = percent; AB = afterburner; dB = decibel; DNL = Day-Night Average Sound Level; LMT = Crater Lake-Klamath Regional Airport.

For school POIs,  $L_{eq(8hr)}$  would increase by approximately 1 to 5 dB under the Proposed Action; however, the number of school POIs above the 60 dB  $L_{eq(8hr)}$  screening threshold would remain seven, consistent with the No Action Alternative. Speech-interfering events per school day hour and time above the interior 50 dB threshold would increase at several school POIs under the Proposed Action. Daytime (7 a.m.–10 p.m. [0700–2200]) non-school speech interference varies by window condition, and PA would change only slightly under the Proposed Action; these limited changes are attributable to the low proportion of nighttime (10 p.m.–7 a.m. [2200–0700]) 173 FW flights relative to civil aircraft activity (DAF 2026). Under the Proposed Action, the DNL 80 dB screening area would extend beyond LMT property in multiple directions by up to approximately 2,000 feet; the area south of LMT would include one household. As described in DNWG (2026), PHL screening relies on  $L_{eq(24hr)}$ , which is similar to DNL but without the nighttime adjustment. Review of  $L_{eq(24hr)}$  contours found no households exposed to 80 dB  $L_{eq(24hr)}$  or greater (average Noise-Induced Permanent Threshold Shift [NIPTS] of 3 dB). One household would be within the 78 to 79 dB  $L_{eq(24hr)}$  band (average NIPTS of 2 dB; most sensitive NIPTS of 5.5 dB) (DAF 2026; DNWG 2026). For reference, changes in hearing level of less than 5 dB are generally not considered noticeable, and audiometric testing variability is commonly assumed to be  $\pm 5$  dB (U.S. Environmental Protection Agency [EPA] 1974).

FAA Order 1050.1G defines a significant noise effect as a DNL increase of 1.5 dB or more for a noise sensitive area exposed at or above DNL 65 dB, or newly exposed at or above DNL 65 dB level due to a DNL 1.5 dB or greater increase, relative to the No Action Alternative for the same timeframe. FAA Order 1050.1G also requires disclosure of noise sensitive areas exposed to DNL 60 dB but below DNL 65 dB that would experience a DNL increase of 3 dB or more, only when DNL 1.5 dB increases are documented within the DNL 65 dB contour (DAF 2026; FAA 2025a).

Figure 3.2-6 depicts modeled change in DNL under the Proposed Action relative to the No Action Alternative and the Proposed Action DNL 60 and 65 dB contours used for FAA Order 1050.1G reporting. FAA Order 1050.1G reporting results for the Proposed Action relative to the No Action Alternative are summarized in Table 3.2-7. Under FAA Order 1050.1G, noise effects for the Proposed Action at LMT would be significant because noise-sensitive areas exposed to DNL 65 dB or greater would experience a DNL increase of 1.5 dB or more relative to No Action (DAF 2026; FAA 2025a).



**Figure 3.2-6 Modeled DNL (Proposed Action F-35A; 95% Afterburner Departures)  
Relative to No Action for FAA Analysis**

**Table 3.2-7 FAA DNL Exposure Thresholds Affecting Acreage, Population, and Households**

| <i>Scenario</i> | <i>FAA Classification<sup>1</sup></i> | <i>Description</i>                              | <i>Acreage</i> | <i>Households</i> | <i>Population</i> |
|-----------------|---------------------------------------|-------------------------------------------------|----------------|-------------------|-------------------|
| F-35A<br>95% AB | Significant                           | +1.5 dB (or higher) Change within<br>DNL 65+ dB | 4,486          | 1,948             | 4,834             |
|                 | Reportable                            | +3 dB (or higher) Change within<br>DNL 60–65 dB | 3,466          | 1,430             | 3,549             |

*Note:* <sup>1</sup>FAA 1050.1G, FAA National Environmental Policy Act Implementing Procedures. 30 June 2025.

*Legend:* % = percent; A/B = afterburner; dB = decibel; DNL = Day-Night Average Sound Level; FAA = Federal Aviation Administration.

### Military Training Airspace

Due to differences in the F-35A training syllabus, military training airspace utilization under the Proposed Action would differ from F-15C/D utilization under Existing Conditions (2023) and the No Action Alternative. The noise analysis documents change by training event and the altitude distribution for F-35A military training airspace operations, including a portion of sorties flown as “red air” (adversary emulation). Consistent with Existing Conditions (2023) and the No Action Alternative, the average sortie duration is approximately 1.3 hours, resulting in roughly 1 hour of flight time within military training airspace per sortie.

Table 3.2-8 summarizes annual military training airspace operations under Existing Conditions (2023), the No Action Alternative, and the Proposed Action. The Proposed Action shifts training operations from the F-15C/D to the F-35A while maintaining ADAIR and other military activity at levels consistent with Existing Conditions (2023). Overall utilization increases under the Proposed Action due to the F-35A training profile, with operations distributed across the Juniper/Hart, Goose, and Dolphin MOAs. Existing noise-abatement procedures described in Section 3.2.1.2 would continue to apply to Oregon ANG military training activities under the Proposed Action (NGB 2017).

**Table 3.2-8 Annual Military Training Airspace Operations (Existing Conditions [2023]; No Action, and Proposed Action)**

| <i>Aircraft</i>             | <i>Airspace</i> | <i>Existing Conditions (2023) (Ops/yr)</i> | <i>No Action (Ops/yr)</i> | <i>Proposed Action (Ops/yr)</i> | <i>Key Change/Driver (Proposed vs Existing)</i>              |
|-----------------------------|-----------------|--------------------------------------------|---------------------------|---------------------------------|--------------------------------------------------------------|
| F-15C/D                     | Juniper/Hart    | 1,541                                      | 1,133                     | 0                               | F-15C/D divestment / replaced by F-35A under Proposed Action |
|                             | Dolphin         | 74                                         | 54                        | 0                               |                                                              |
|                             | Goose           | 1,579                                      | 1,161                     | 0                               |                                                              |
| F-35A                       | Juniper/Hart    | 0                                          | 0                         | 3,145                           | Proposed F-35A beddown                                       |
|                             | Dolphin         | 0                                          | 0                         | 159                             |                                                              |
|                             | Goose           | 0                                          | 0                         | 1,281                           |                                                              |
| F-5E (ADAIR)                | Total           | 800                                        | 800                       | 800                             | No change                                                    |
| Other Military              | Total           | 252                                        | 252                       | 252                             | No change                                                    |
| <b>Total All Operations</b> | <b>Total</b>    | <b>4,246</b>                               | <b>3,400</b>              | <b>5,637</b>                    | <b>+1,391 operations (+32.7%)</b>                            |

*Legend:* % = percent; ADAIR = Adversary Air; Ops = operations; yr = year.

Single-event noise metrics were evaluated to compare typical military training airspace profiles for the F-15C/D and F-35A. SEL represents the total sound energy of a single event, while  $L_{max}$  represents the peak level during that event. As shown in Table 3.2-9, the F-35A produces higher single-event levels than the F-15C/D at each modeled altitude under comparable conditions

(military power at 400 knots). The difference is greatest at lower altitudes and decreases with increasing altitude, consistent with sound attenuation over distance (DAF 2026).

**Table 3.2-9 SEL and  $L_{max}$  Comparison for Typical Military Training Airspace Profiles**

| <i>Altitude<br/>(feet AGL)</i> | <i>F-15C/D<br/>(PW-220)</i> |                             | <i>F-35A<br/>(PW-100)</i> |                             |
|--------------------------------|-----------------------------|-----------------------------|---------------------------|-----------------------------|
| <i>Metric</i>                  | <i>SEL</i>                  | <i><math>L_{max}</math></i> | <i>SEL</i>                | <i><math>L_{max}</math></i> |
| 500                            | 116                         | 111                         | 121                       | 119                         |
| 1,000                          | 111                         | 104                         | 115                       | 111                         |
| 2,000                          | 105                         | 97                          | 108                       | 103                         |
| 5,000                          | 95                          | 85                          | 99                        | 91                          |
| 10,000                         | 86                          | 75                          | 89                        | 81                          |

*Note:* All aircraft modeled at military power and 400 knots for comparison.

*Legend:* AGL = above ground level;  $L_{max}$  = Maximum Sound Level; PW = Pratt & Whitney; SEL = Sound Exposure Level.

*Source:* NOISEMAP version 7.3.

DNL and  $L_{dnmr}$  metrics were used to characterize noise exposure within the military training airspace under the Proposed Action. Because most training occurs above 10,000 feet MSL, the rise-time adjustment applied to  $L_{dnmr}$  remains small and does not produce a measurable difference from DNL when values are rounded to whole decibels. Under the Proposed Action, the greatest modeled DNL/ $L_{dnmr}$  values (approximately 49 dB) would occur in Juniper Low, Juniper East Low, Goose North, and Goose South due to a combination of increased operations in Goose and the lower floor/lower altitudes in the Juniper Low and Juniper East Low MOAs. The remainder of the Juniper/Hart complex outside Juniper Low and Juniper East Low would be approximately 40 dB, and Dolphin North and South would remain less than 35 dB, reflecting relatively few operations distributed over a large area with a minimum altitude of 11,000 feet MSL. Overall, DNL/ $L_{dnmr}$  within the military training airspace would increase by approximately 2 to 5 dB compared to the No Action Alternative (DAF 2026).

Supersonic flight is primarily associated with air combat training and involves brief periods above Mach 1.0, which can generate a shock wave (“sonic boom”) that may reach the ground depending on altitude and atmospheric conditions. Higher altitudes reduce the likelihood of sonic booms reaching the ground, while lower altitudes and higher Mach numbers increase the likelihood and intensity of sonic booms. Under the Proposed Action, supersonic operations would occur within the Juniper/Hart MOA complex and would be conducted at or above 30,000 feet MSL over land, consistent with Existing Conditions (2023). Because the proportion of sorties involving supersonic flight is assumed to remain generally consistent (approximately 75 percent), the number of supersonic events would increase in proportion to the overall increase in training activity. Supersonic modeling indicates a maximum CDNL of approximately 40 dBC near the center of the Juniper/Hart MOA complex, representing an increase of approximately 4 dBC relative to No Action Alternative, driven primarily by increased operations. The CDNL remains relatively low primarily due to the 30,000-foot MSL altitude floor for supersonic operations (DAF 2026).

Overall, the Proposed Action increases modeled community noise exposure near LMT relative to the No Action Alternative, including expansion of the DNL 65 dB contour and additional noise-sensitive receptors exposed at or above DNL 65 dB. Under FAA Order 1050.1G, the Proposed Action meets the criteria for a significant noise effect because noise-sensitive areas exposed to

DNL 65 dB or greater would experience a DNL increase of 1.5 dB or more relative to No Action (DAF 2026; FAA 2025a).

### **3.2.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that warrant additional consideration for noise. Therefore, no additional construction or operational noise sources associated with reasonably foreseeable actions are included in the analysis.

Civil aviation activity at LMT is expected to continue during the period of analysis. Forecast changes in civil aircraft operations identified in the FAA Terminal Area Forecast are incorporated into the noise modeling for the Proposed Action and the No Action Alternative. Other ongoing aviation activities included in the noise model, such as contract adversary air operations, military and other agency transient operations, and Sentry Eagle activities, are assumed to continue at the levels described in the respective modeling scenarios.

The noise analysis accounts for relevant changes in the existing acoustic environment through the operational assumptions incorporated into the noise model. No other environmental trends have been identified that would be expected to materially alter noise conditions within the ROI during the period of analysis.

## **3.3 AIRSPACE**

### **3.3.1 Affected Environment**

Airspace Management involves the designation, use, and administration of airspace to balance the needs of military, commercial, general aviation, and other users. The DAF airspace management program is established under Air Force Policy Directive 13-2, *Air Traffic, Airfield, Airspace, and Range Management*, and implemented in accordance with DAF Manual (DAFMAN) 13-201, *Airspace Management*. At the local level, installation flying instructions and Letters of Agreement with the FAA establish installation-specific procedures.

LMT has two operational runways, Runway 14/32 and Runway 08/26. The City of Klamath Falls' 2021 *Crater Lake–Klamath Regional Airport Master Plan* identifies Runway 14/32 as the designated calm wind runway end and reports that it accommodates nearly 85 percent of aircraft operations, including military operations associated with the Existing Conditions (2023). Runway 08/26 is used primarily for civilian traffic and to help deconflict operations with Runway 14/32 (City of Klamath Falls 2021).

#### **3.3.1.1 Air Traffic Operations**

Existing Conditions (2023) airfield operations at LMT totaled 41,035 annual operations, including civil and military activity (DAF 2026; FAA 2024b). Military operations accounted for 16,838 operations (approximately 41 percent) of total airfield operations, and the 173 FW's F-15C/D aircraft represented approximately 80 percent of modeled military operations under Existing Conditions (2023) (DAF 2026; FAA 2024b). The modeled aircraft operations breakdown is provided in Table 2.1-2.



### 3.3.1.2 Military Training Airspace

The 173 FW conducts training within existing military training airspace in the region, including the Juniper/Hart MOA complex and Goose MOAs east of LMT/Kingsley Field ANGB and the Dolphin MOA along the Oregon coast (see Figure 2.1-4). The Wing also uses W-93 occasionally. Several Military Training Routes (MTRs) exist beneath these MOAs and may be used occasionally by various military units; these are existing routes and are not a driver of the affected environment for this action. Existing Conditions (2023) military training airspace utilization is documented in the *Final Noise Study* and summarized in Section 3.2 (DAF 2026).

Airspace management across the 173 FW training area incorporates civil aviation deconfliction protocols established under the 2017 *Oregon Airspace EIS* (NGB 2017) and the 2023 *Mountain Home Airspace EIS* (DAF 2023a). Key operational measures include: (1) maintaining elevated MOA floors (such as 11,000 feet MSL in the Dolphin MOA) to allow uninterrupted coastal civil traffic; (2) observing charted avoidance buffers around civil airfields; and (3) coordinating dynamically with FAA Seattle and Salt Lake City Air Route Traffic Control Centers to release unutilized military airspace back to civil aviation immediately upon mission completion.

### 3.3.2 Environmental Consequences

The airspace assessment evaluates how the alternatives would affect airspace use, including changes in context (e.g., where and when activities occur) and intensity (e.g., frequency, tempo, and airspace utilization). The analysis considers whether projected changes in airfield operations or military training airspace use could measurably affect other airspace users or airspace management within the existing system.

#### 3.3.2.1 No Action Alternative

##### Installation

Under the No Action Alternative, 173 FW F-15C/D operations are modeled as a reduced training pattern of 6 aircraft for the first launch and 4 aircraft for the second launch each day (10 sorties per day), resulting in an estimated 2,400 annual sorties (9,600 annual operations). Contract ADAIR operations, transient military operations, and other agency operations are assumed to remain consistent with Existing Conditions (2023). Civil aircraft operations are forecasted to total 26,102 annual operations in 2029 (DAF 2026).

Overall, total combined (civil and military) airfield operations under the No Action Alternative are 39,100 annually, representing an approximate 4.7 percent reduction relative to Existing Conditions (2023), driven primarily by the reduction in 173 FW F-15C/D operations. Because the No Action Alternative reflects a modest decrease in airfield operations and does not involve changes to runway configurations, flight procedures, or airspace designations, airspace effects under the No Action Alternative would not be significant.

##### Military Training Airspace

Under the No Action Alternative, 173 FW F-15C/D use of existing military training airspace would continue at a reduced level consistent with the modeled reduction in F-15C/D activity (DAF 2026). Current-day operations may be lower due to accelerated divestment and are not necessarily represented by the Existing Conditions (2023) dataset used for modeling (DAF 2026). Because the

No Action Alternative reduces training airspace utilization and does not modify existing airspace designations or procedures, airspace effects would not be significant.

### 3.3.2.2 Proposed Action Alternative

#### Installation

LMT supports approximately 41,035 airport operations under Existing Conditions (2023), approximately 41 percent of which are military operations (DAF 2026; FAA 2024b). Under the Proposed Action, F-35A airfield operations would total 20,780 annually compared to 9,600 annual F-15C/D operations under the No Action Alternative (and 13,440 airfield operations under Existing Conditions [2023]). Overall, total airfield operations would increase from 39,100 annually under the No Action Alternative to 50,280 annually under the Proposed Action (approximately 29 percent) (DAF 2026). Operations would continue within existing runway configurations and established arrival/departure and pattern procedures and would be managed through existing FAA/installation air traffic management processes. Because the Proposed Action increases airfield activity but does not change runway configurations, flight procedures, or airspace designations, airspace effects at the installation level would not be significant.

#### Military Training Airspace

Flight operations under the Proposed Action would be conducted within existing military training airspace. The F-35A is expected to use an altitude distribution generally similar to the F-15C/D; however, while the majority of training activity will shift to higher altitudes—with an increase in training at 20,000 feet MSL and above from 45 percent to 61 percent—training at low altitudes (500 feet AGL to 10,000 feet MSL) would also experience a minor increase from 5 percent to 6 percent (see Table 2.1-6). Published times of use for the military training airspace would remain consistent with Existing Conditions (2023) (DAF 2026).

Table 3.3-1 summarizes military training airspace usage and reflects an overall increase in operations in military training airspace under the Proposed Action, relative to the No Action Alternative. The Juniper/Hart MOA complex would experience the greatest increase in operations, while the Goose MOAs would experience the smallest increase (approximately 10 percent). The 2020 ADAIR EA evaluated a total of 1,301 annual sorties within the Goose South MOA, including baseline 173 FW F-15C/D training sorties and contractor ADAIR sorties; while that analysis did not evaluate F-35A training, it provides context for existing levels of airspace utilization in the region (DAF 2020a, 2026).

**Table 3.3-1 Military Training Airspace Usage  
(Existing Conditions [2023] and Proposed Action)**

| <i>Aircraft</i> | <i>Juniper/Hart</i> |              | <i>Dolphin</i> |              | <i>Goose</i> |              | <i>Total Operations<sup>1</sup></i> |              |              |
|-----------------|---------------------|--------------|----------------|--------------|--------------|--------------|-------------------------------------|--------------|--------------|
|                 | <i>Day</i>          | <i>Night</i> | <i>Day</i>     | <i>Night</i> | <i>Day</i>   | <i>Night</i> | <i>Day</i>                          | <i>Night</i> | <i>Total</i> |
| F-15C/D         | 1,099               | 34           | 52             | 2            | 1,126        | 35           | 2,277                               | 71           | 2,348        |
| F-5E (ADAIR)    | 740                 | 23           | 36             | 1            | 0            | 0            | 776                                 | 24           | 800          |
| Other Military  | 252                 | 0            | 0              | 0            | 0            | 0            | 252                                 | 0            | 252          |
| <b>Total</b>    | <b>2,091</b>        | <b>57</b>    | <b>88</b>      | <b>3</b>     | <b>1,126</b> | <b>35</b>    | <b>3,305</b>                        | <b>95</b>    | <b>3,400</b> |
| F-35A           | 3,051               | 94           | 154            | 5            | 1,243        | 38           | 4,448                               | 137          | 4,585        |
| F-5E (ADAIR)    | 740                 | 23           | 36             | 1            | 0            | 0            | 776                                 | 24           | 800          |
| Other Military  | 252                 | 0            | 0              | 0            | 0            | 0            | 252                                 | 0            | 252          |
| <b>Total</b>    | <b>4,043</b>        | <b>117</b>   | <b>190</b>     | <b>6</b>     | <b>1,243</b> | <b>38</b>    | <b>5,476</b>                        | <b>161</b>   | <b>5,637</b> |

*Note:* <sup>1</sup>W-93 would continue to be used by 173 FW, but less often due to distance and is not included in the table.

*Legend:* ADAIR = Adversary Air.

The 173 FW does not have an air-to-ground mission under Existing Conditions (2023). Under the Proposed Action, the F-35A training syllabus includes target delivery training for one sortie per syllabus rotation. This training would occur at R-3202 High/Low (Saylor Creek Bombing Range) within the Mountain Home Range Complex and the Jarbidge North MOA. These operations fall within existing transient aircraft activity levels previously analyzed for the Jarbidge North MOA as detailed in the *Airspace Optimization for Readiness at Mountain Home Air Force Base, Idaho EIS* (DAF 2023a). Adherence to established Letters of Agreement between the 173 FW, Mountain Home AFB, and regional FAA Air Route Traffic Control Centers ensures that the addition of approximately 100 annual training events will not exceed authorized transient capacity or disrupt regional civil airway flow.

Several MTRs exist beneath the MOAs and may be used occasionally by various military units. With regional MOAs that include lower floors (e.g., Goose North MOA), the Proposed Action is not expected to require increased reliance on MTRs for the 173 FW training profile; therefore, MTRs are not carried forward for further analysis.

Although utilization would increase, the Proposed Action does not establish new airspace, modify existing boundaries, or change operating procedures; therefore, effects are limited to increased activity within existing managed airspace. Based on the continued use of existing airspace and existing management processes, airspace effects under the Proposed Action would not be significant.

### **3.3.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that warrant additional consideration for airspace. Therefore, no additional changes to airspace designations, boundaries, or flight procedures associated with reasonably foreseeable actions are included in the analysis.

Civil and military aviation activity at LMT and within the military training airspace is expected to continue during the period of analysis. Forecast civil aircraft activity is incorporated into the airfield operations evaluated for the Proposed Action and the No Action Alternative. Ongoing contract ADAIR operations, transient military and other agency operations, and use of existing military training airspace are likewise reflected in the operational assumptions for the respective alternatives.

The existing airspace structure and air traffic management framework are expected to remain in place during the period of analysis. No other trends have been identified that would be expected to materially alter the airspace structure or management conditions evaluated under the Proposed Action or the No Action Alternative.

### **3.4 AIR QUALITY**

Air quality refers to the concentration of various pollutants in the atmosphere at a given location. Under the Clean Air Act, criteria pollutants include carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide, ozone (O<sub>3</sub>), lead, particulate matter less than or equal to 10 microns (PM<sub>10</sub>) and particulate matter less than or equal to 2.5 microns (PM<sub>2.5</sub>). The EPA has established National Ambient Air Quality Standards (NAAQS) for criteria pollutants (40 Code of Federal Regulations [CFR] part 50). The General Conformity Rule (40 CFR part 93, Subpart B) applies to federal actions in nonattainment or maintenance areas when total direct and indirect emissions of a relevant pollutant (or precursors) exceed applicable thresholds.

The Oregon Department of Environmental Quality (DEQ) is the regulatory agency that oversees programs to restore, maintain, and enhance the state's air quality through implementation of pollution controls (Oregon DEQ 2024a). Oregon DEQ issues permits for air contamination sources classified by air contaminant type, source category, or geographic area under Oregon Revised Statutes 468A.040. The state is divided into three air quality regions: Eastern (18 counties), Western (12 counties), and Northwest (six counties) (Oregon DEQ 2024b).

Hazardous air pollutants are pollutants for which no NAAQS have been established but that are regulated under the Clean Air Act because of their potential adverse effects on human health and the environment. Also known as "air toxics," hazardous air pollutants include a wide array of organic and inorganic compounds (e.g., formaldehyde, 1-acetaldehyde, benzene, toluene, acrolein, 1,3-butadiene, xylene, lead, naphthalene, propionaldehyde). For aviation-related sources, these emissions may be present in exhaust from aircraft, auxiliary power units, aerospace ground equipment (AGE), and motor vehicles and, to a lesser extent, from boilers, fuel facilities, and other stationary sources (FAA 2024c).

The ROI for criteria pollutants includes LMT/Kingsley Field ANGB located in Klamath County, Oregon, within the Central Oregon Intrastate Air Quality Control Region (40 CFR section 81.219), and, to a limited extent, the military training airspace as described below. The ROI for greenhouse gas (GHG) emissions is global.

#### **3.4.1 Affected Environment**

##### **3.4.1.1 Installation**

A portion of Klamath County is designated a moderate nonattainment area for the 24-hour PM<sub>2.5</sub> (2006) NAAQS, and LMT/Kingsley Field ANGB is located within this nonattainment area. Klamath County is in attainment for all other criteria pollutants (EPA 2024a). Because of the PM<sub>2.5</sub> moderate nonattainment area designation for Klamath County, the General Conformity Rule applies, and a General Conformity Applicability Analysis has been included in this air quality analysis.

Kingsley Field ANGB operates under a Simple Air Contaminant Discharge Permit (ACDP) issued by Oregon DEQ (permit number 18-0097-SI-01) for aircraft engine testing; painting aircraft parts and support equipment; emergency generator use; and operation of aboveground storage tanks (ASTs). In accordance with Oregon Administrative Rule 340-240-0530, *Klamath Falls Nonattainment Area: Requirement for Operation and Maintenance Plans*, the 173 FW has developed an Air Quality Management Plan to maintain compliance with applicable air quality requirements (173 FW 2026).

Mobile-source emissions are generated by aircraft, vehicles, equipment, and other sources that move or have the potential to move from place to place. Equipment emissions include forklifts, backhoes, tractors, and other onsite construction equipment. AGE used to service aircraft includes generators, light carts, compressors, bomb lifts, hydraulic test stands, and other portable equipment required for aircraft operations.

The 2022 Stationary Source Air Emissions Inventory (the most recent data available) for Kingsley Field ANGB is summarized in Table 3.4-1. This inventory reflects permitted stationary sources and is provided for affected environment context. Although the Existing Conditions (2023) comparative analysis includes modeled F-15C/D mobile-source emissions that have since ceased, the Existing Conditions (2023) dataset is retained to provide consistent baseline for comparison of the No Action Alternative and Proposed Action. Current-day emissions at the installation are likely lower than the Existing Conditions (2023) levels presented here.

**Table 3.4-1 Calendar Year 2022 Stationary Source Air Emissions Inventory for  
Kingsley Field ANGB (tons per year)**

| <i>Year</i> | <i>VOCs</i> | <i>NO<sub>x</sub></i> | <i>CO</i> | <i>SO<sub>2</sub></i> | <i>PM<sub>10</sub></i> | <i>PM<sub>2.5</sub></i> | <i>CO<sub>2e</sub></i> |
|-------------|-------------|-----------------------|-----------|-----------------------|------------------------|-------------------------|------------------------|
| 2022        | 0.11        | 0.67                  | 0.36      | 0.04                  | 0.06                   | 0.06                    | ND                     |

*Legend:* CO = carbon monoxide; CO<sub>2e</sub> = carbon dioxide equivalent; ND = no data available in the 2022 report, as CO<sub>2e</sub> is not required to be reported under the ANG Installation's permit; NO<sub>x</sub> = nitrogen oxides; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; PM<sub>10</sub> = particulate matter less than or equal to 10 microns in diameter; SO<sub>2</sub> = sulfur dioxide; VOCs = volatile organic compounds.

*Source:* Oregon ANG 2023a.

### 3.4.1.2 Military Training Airspace

For air quality analysis, the military training airspace affected environment is limited to areas where 173 FW flight operations occur below the average mixing height of 3,000 feet AGL. Aircraft operations at or above this height are not expected to substantially affect ground-level pollutant concentrations or cause local NAAQS violations (FAA 2000).

Low-altitude operations under Existing Conditions (2023) occur in the Juniper Low MOA (covering portions of Crook, Deschutes, Harney, and Lake Counties in Oregon); Juniper East Low MOA (covering a portion of Harney County, Oregon); and the Boardman Low MOA (Morrow and Umatilla Counties in Oregon). The town of Lakeview (Lake County) is a PM<sub>10</sub> maintenance area, but lies outside the Juniper Low MOA; Lake County is otherwise in attainment for all other criteria pollutants. Crook, Deschutes, Harney, Morrow, and Umatilla Counties are in attainment for all criteria pollutants.

Unlike regular airfield activity, operations within MOAs are infrequent and sporadic. Annual use of the Juniper Low MOA, between 500 and 11,000 feet AGL, totals up to 90 flight hours, with less than 2 percent of that flight time occurring below 3,000 feet AGL (NGB 2017).

### **3.4.2 Environmental Consequences**

Detailed air emissions calculations, threshold screening, and supporting records are provided in the Air Conformity Applicability Model (ACAM) Report (DAF 2024).

For attainment area criteria pollutants, this analysis applied the EPA General Conformity *de minimis* threshold of 100 tons per year as an initial indicator of the potential local significance. This comparative threshold is used as a screening tool and does not represent a regulatory limit.

Emissions for construction, renovation, demolition, and worker commutes under Existing Conditions (2023), the Proposed Action and the No Action Alternative were estimated using the ACAM version 5.0.23a. ACAM estimates criteria pollutant and precursor emissions as defined for NAAQS applicability. Aircraft emissions were estimated by operational mode, including taxi/idle (in and out), takeoff, climb out, and approach. Military training airspace operations were excluded because annual flight time below the 3,000-foot AGL mixing height for both F-15C/D and F-35A would not be expected to generate emissions sufficient to cause a significant effect. Detailed assumptions and results are provided in the *ACAM Report* (DAF 2024).

To minimize air quality effects, both the Proposed Action and No Action Alternative would implement standard best management practices (BMPs), where feasible. Examples include minimizing trips, maintaining engine performance, using electric tools where practicable, carpooling, optimizing trip routes, and strategically locating staging areas to reduce travel distances.

#### **3.4.2.1 No Action Alternative**

Emission estimates for the No Action Alternative were developed in ACAM (version 5.0.23a) using modeled F-15C/D operations (two Pratt and Whitney F100-PW-220 engines), base-specific operational inputs (landings/takeoffs, closed patterns, and engine testing), and associated support activities. Although F-15C/D aircraft have since been divested, the No Action Alternative retains modeled F-15C/D operations as the analytical reference scenario for comparison to the Proposed Action (DAF 2024).

The No Action Alternative emissions associated with the modeled 9,600 annual F-15C/D operations at Kingsley Field ANGB are presented in Table 3.4-2. Other modeled aircraft activities and non-aircraft sources are assumed to remain consistent with Existing Conditions (2023) for comparative purposes. Additional emissions associated with aircraft operations include AGE and engine testing.



**Table 3.4-2 No Action Alternative Annual Airfield Emissions Estimates for the 173 FW  
(tons per year)**

| <i>Activity</i>                                                              | <i>VOCs</i>   | <i>NO<sub>x</sub></i> | <i>CO</i>     | <i>SO<sub>2</sub></i> | <i>PM<sub>10</sub></i> | <i>PM<sub>2.5</sub></i> | <i>CO<sub>2e</sub><br/>(mtons)</i> |
|------------------------------------------------------------------------------|---------------|-----------------------|---------------|-----------------------|------------------------|-------------------------|------------------------------------|
| Existing Conditions (2023) F-15C/D Aircraft Operations                       | 46.70         | 64.34                 | 182.66        | 8.11                  | 8.69                   | 4.44                    | 22,100                             |
| No Action Alternative F-15C/D Aircraft Operations (29% operational decrease) | 33.27         | 45.91                 | 130.07        | 5.78                  | 3.52                   | 3.17                    | 15,754                             |
| <b>Total Decrease in Tons</b>                                                | <b>-13.43</b> | <b>-18.43</b>         | <b>-52.59</b> | <b>-2.33</b>          | <b>-5.17</b>           | <b>-1.27</b>            | <b>-6,346</b>                      |

*Note:* Values reflect the Existing Conditions (2023) data used for analysis and are not intended to describe current-day 173 FW fighter operations.

*Legend:* % = percent; 173 FW = 173d Fighter Wing; CO = carbon monoxide; CO<sub>2e</sub> = carbon dioxide equivalent; mtons = metric tons; NO<sub>x</sub> = nitrogen oxides; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; PM<sub>10</sub> = particulate matter less than or equal to 10 microns in diameter; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compound.

Under the No Action Alternative, modeled 173 FW airfield operations decrease by approximately 29 percent relative to the Existing Conditions (2023), and operational emissions decrease for all criteria pollutants and carbon dioxide equivalent (CO<sub>2e</sub>) (see Table 3.4-2). For comparison with construction activity, a modeled ramp-down profile (approximately 6 percent annual reduction beginning in 2024) was used to evaluate year-by-year emissions. This analytical ramp-down does not reflect the actual accelerated divestment timeline (which actually occurred in the late 2024/early 2025 timeframe, but it provides a consistent and conservative framework for comparative threshold screening.

Total annual emissions for construction and modeled No Action F-15C/D airfield operations are presented in the *ACAM Report* (DAF 2024). No construction projects with a ground disturbance footprint are planned to begin before 2026, and no projects are planned to begin after 2040. Based on the ACAM calculations, combined construction and modeled F-15C/D operational emissions associated with the No Action Alternative would not exceed the *de minimis* threshold of 100 tons per year for PM<sub>2.5</sub> and its precursors (volatile organic compounds [VOCs], nitrogen oxides [NO<sub>x</sub>], and SO<sub>2</sub>) or the 100 tons per year comparative threshold for CO and PM<sub>10</sub>. Because PM<sub>2.5</sub> and its precursors do not exceed applicable thresholds, General Conformity does not apply to these activities. The change in criteria pollutant emissions under the No Action Alternative would not have a significant effect on air quality, as detailed in the Record of Conformity Applicability and Record of Air Analysis in the *ACAM Report* (DAF 2024).

#### 3.4.2.2 Proposed Action Alternative

Construction projects to support the F-35A beddown would occur between 2026 and 2040, with all critical infrastructure anticipated to be completed prior to aircraft arrival. Any new stationary sources (e.g., emergency generators, boilers, industrial process equipment) would be subject to applicable new source review and permitting requirements under the ACDP. Any new or modified stationary sources required under the Proposed Action would undergo permit technical review to determine whether the existing permit must be updated. If emissions from new sources increase annual totals beyond the Simple ACDP thresholds, a Standard ACDP could be required.

Airfield operations under the Proposed Action are modeled to increase relative to the No Action Alternative (which reflects a 29 percent reduction from Existing Conditions [2023]). The net

change in operational emissions at Kingsley Field ANGB is presented in Table 3.4-3 and assume that 100 percent of the F-35A aircraft would be on-site and operational in 2029. The net change reflects differences in engine type, annual operations, commuter emissions associated with additional personnel assigned to support the F-35A mission. As shown in Table 3.4-3, operational emissions would decrease for VOCs, CO, SO<sub>2</sub>, and increase for NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO<sub>2e</sub>.

**Table 3.4-3 Proposed Action Annual Airfield Emissions Estimates for the 173 FW  
(tons per year)**

| <i>Activity</i>                                 | <i>VOCs</i>   | <i>NO<sub>x</sub></i> | <i>CO</i>     | <i>SO<sub>2</sub></i> | <i>PM<sub>10</sub></i> | <i>PM<sub>2.5</sub></i> | <i>CO<sub>2e</sub></i> |
|-------------------------------------------------|---------------|-----------------------|---------------|-----------------------|------------------------|-------------------------|------------------------|
| F-15C/D No Action Airfield Operations           | 33.27         | 45.91                 | 130.07        | 5.78                  | 3.52                   | 3.17                    | 15,754                 |
| F-35A Aircraft Operations Added                 | 0.09          | 60.61                 | 35.90         | 5.45                  | 7.86                   | 7.07                    | 16,372                 |
| F-35A Additional Commuter Emissions             | 0.04          | 0.02                  | 0.55          | 0.00                  | 0.00                   | 0.00                    | 62                     |
| <b>Total for F-35 Addition</b>                  | <b>0.13</b>   | <b>60.64</b>          | <b>36.45</b>  | <b>5.45</b>           | <b>7.86</b>            | <b>7.07</b>             | <b>16,434</b>          |
| <b>Net Change in Airfield Emissions – F-35A</b> | <b>-33.14</b> | <b>14.72</b>          | <b>-93.62</b> | <b>-0.33</b>          | <b>4.34</b>            | <b>3.90</b>             | <b>680</b>             |
| <i>De Minimis</i> Thresholds                    | 100           | 100                   | NA            | 100                   | NA                     | 100                     | NA                     |
| Comparative Thresholds                          | NA            | NA                    | 100           | NA                    | 100                    | NA                      | NA                     |
| Exceed Thresholds?                              | No            | No                    | No            | No                    | No                     | No                      | NA                     |

*Legend:* 173 FW = 173d Fighter Wing; CO = carbon monoxide; CO<sub>2e</sub> = carbon dioxide equivalent; NA = Not Applicable; NO<sub>x</sub> = nitrogen oxides; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; PM<sub>10</sub> = particulate matter less than or equal to 10 microns in diameter; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compound.

The total annual emissions for both construction and F-35A operations are presented in the *ACAM Report* (DAF 2024). Emissions were evaluated against the applicable *de minimis* and comparative screening thresholds. For 2027 and 2028, the analysis assumes 50 percent of the F-35A fleet is operational, with a corresponding 50 percent reduction in modeled F-15C/D operations for comparison. This approach provides a conservative estimate because F-15C/D operations have already ceased and the modeled F-15C/D activity is retained only for comparative analysis.

Based on these calculations, combined construction and Proposed Action operational emissions would not exceed the *de minimis* threshold for PM<sub>2.5</sub> and its precursors (VOCs, NO<sub>x</sub>, and SO<sub>2</sub>) or the comparative threshold for CO and PM<sub>10</sub> for any year analyzed. Therefore, General Conformity does not apply, and the net change in criteria pollutant emissions associated with the Proposed Action would not have a significant effect on air quality. A Record of Conformity Applicability for PM<sub>2.5</sub> and its precursor (VOCs, NO<sub>x</sub>, and SO<sub>2</sub>) and a Record of Air Analysis for the remaining criteria pollutants are provided in the *ACAM Report* (DAF 2024).

### **3.4.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that warrant additional consideration for air quality. Air quality within the ROI would continue to be influenced by existing regional conditions and federal and state air quality requirements. LMT/Kingsley Field ANGB is located within the Klamath Falls PM<sub>2.5</sub> moderate nonattainment area, and Clean Air Act and General Conformity requirements would continue to apply. Existing stationary sources at Kingsley Field ANGB would also continue to operate under Oregon DEQ permitting requirements.

No other environmental trends have been identified that would be expected to materially alter the air quality conditions evaluated under the Proposed Action or the No Action Alternative.

### 3.4.3.1 Greenhouse Gases (GHGs)

GHG emissions would result from fossil fuel combustion associated with aircraft operations and other activities under both the No Action Alternative and the Proposed Action. Although this section is included under reasonably foreseeable actions and environmental trends, no additional reasonably foreseeable actions have been identified that would introduce new or separate sources of GHG emissions beyond those already analyzed for the alternatives.

GHG emissions were estimated using the modeled airfield emissions and anticipated annual training activity for each alternative. The resulting annual emissions estimates are presented in Tables 3.4-4 through 3.4-6, with supporting calculations provided in the ACAM Report (DAF 2024).

**Table 3.4-4 GHG Emissions Estimates for No Action Alternative  
Compared to Existing Conditions (2023) (tons per year)**

| <i>Activity</i>                                 | <i>CO<sub>2</sub>e (mtons)</i> |
|-------------------------------------------------|--------------------------------|
| F-15C/D Existing Conditions (2023) Sorties      | 73,500                         |
| Airfield Totals                                 | 22,100                         |
| <b>Annual GHG total</b>                         | <b>95,600</b>                  |
| 50-year lifecycle emissions of F-15C/D Existing | 4,780,000                      |
| F-15C/D No Action Sorties                       | 52,194                         |
| Airfield Totals                                 | 15,754                         |
| <b>Annual GHG total</b>                         | <b>67,948</b>                  |
| Total 50-year emissions F-15C/D No Action       | 3,397,400                      |
| <b>Annual GHG net change</b>                    | <b>-27,652</b>                 |
| 50-year net change lifecycle emissions          | -1,382,600                     |

*Note:* <sup>1</sup>F-15C/D operations under the No Action Alternative are reduced relative to Existing Conditions (2023). “No Action” values reflect the planning scenario used for comparison and are not intended to represent current-day operations.

*Legend:* CO<sub>2</sub>e = carbon dioxide equivalent; GHG = greenhouse gas; mtons = metric tons.

**Table 3.4-5 GHG Emissions Estimates for Proposed Action  
Compared to the No Action Alternative (tons per year)**

| <i>Activity</i>                                 | <i>CO<sub>2</sub>e (mtons)</i> |
|-------------------------------------------------|--------------------------------|
| F-15C/D No Action Sorties                       | 52,194                         |
| Airfield Totals                                 | 15,754                         |
| <b>Annual GHG total</b>                         | <b>67,948</b>                  |
| 50-year lifecycle emissions of F-15C/D Existing | 3,397,400                      |
| F-35A Sorties                                   | 140,564                        |
| Airfield Totals                                 | 16,372                         |
| <b>Annual GHG total</b>                         | <b>156,936</b>                 |
| <b>Total 50-year emissions F-35A</b>            | <b>7,846,800</b>               |
| <b>Annual GHG net change</b>                    | <b>88,988</b>                  |
| <b>50-year net change lifecycle emissions</b>   | <b>4,449,400</b>               |

*Note:* “No Action” values reflect the modeled No Action scenario used for comparison and are not intended to represent current-day operations.

*Legend:* CO<sub>2</sub>e = carbon dioxide equivalent; GHG = greenhouse gas; mtons = metric tons.

**Table 3.4-6 GHG Emissions Estimates for Proposed Action  
Compared to Existing Conditions (2023) (tons per year)**

| <i>Activity</i>                                 | <i>CO<sub>2</sub>e (mtons)</i> |
|-------------------------------------------------|--------------------------------|
| F-15C/D Existing Conditions (2023) Sorties      | 73,500                         |
| Airfield Totals                                 | 22,100                         |
| <b>Annual GHG total</b>                         | <b>95,600</b>                  |
| 50-year lifecycle emissions of F-15C/D Existing | 4,780,000                      |
| F-35A Sorties                                   | 140,564                        |
| Airfield Totals                                 | 16,372                         |
| <b>Annual GHG total</b>                         | <b>156,936</b>                 |
| <b>Total 50-year emissions F-35A</b>            | <b>7,846,800</b>               |
| Annual GHG net change                           | 61,339                         |
| <b>50-year net change lifecycle emissions</b>   | <b>3,066,950</b>               |

*Note:* Existing Conditions (2023) data provides a consistent basis for calculating the 50-year lifecycle net change. They are not intended to describe current-day 173 FW fighter operations.

*Legend:* CO<sub>2</sub>e = carbon dioxide equivalent; GHG = greenhouse gas; mtons = metric tons.

For purposes of illustrating potential long-term emissions under the planning assumptions used in this EIS, annual emissions were extrapolated over the 50-year analysis period (2029–2079). This calculation assumes a constant level of annual operations and is not a forecast over that period. Actual operations may vary based on mission requirements, aircraft availability, training requirements, and other factors.

No reasonably foreseeable actions have been identified that would contribute additional GHG emissions beyond those associated with the Proposed Action or the No Action Alternative.

### **3.5 SOCIOECONOMICS/PROTECTION OF CHILDREN AND ELDERLY**

#### **3.5.1 Affected Environment**

##### **3.5.1.1 Socioeconomics**

Socioeconomics encompasses the attributes and resources of the human environment, including community infrastructure and economic activity. Socioeconomic effects may be considered significant if the Proposed Action alters patterns of land use, population density, or growth rate in the ROI. For this analysis, the ROI is defined as Klamath County, Oregon, which includes primary access points and built infrastructure influencing where Kingsley Field personnel live, spend earnings, and contribute to tax revenues.

##### **3.5.1.2 Population**

In 2022, Klamath County had a total population of 70,200 people, which is forecast to increase by about 1,500 people by 2040 (Table 3.5-1). Klamath County is predicted to have slower population growth (3 percent) than the state of Oregon (5.5 percent) during the 25-year period of 2022–2047 (Cellarius et al. 2022). Predictions are that this growth will be concentrated in urban areas, with the Klamath Falls Urban Growth Boundary growing at approximately 1.5 times the rate of the county overall (Cellarius et al. 2022).

**Table 3.5-1 Population in the ROI**

| <i>Area</i>                         | <i>2010</i> | <i>2020</i> | <i>Percent Change</i> | <i>2022</i> | <i>2040 (estimated)</i> |
|-------------------------------------|-------------|-------------|-----------------------|-------------|-------------------------|
| United States                       | 308,745,538 | 331,449,281 | 7.4                   | 331,097,593 | 373,500,000             |
| Oregon                              | 3,831,074   | 4,237,256   | 10.6                  | 4,229,374   | 4,700,000               |
| Klamath County                      | 66,380      | 69,413      | 4.6                   | 70,212      | 71,600                  |
| Klamath Falls Urban Growth Boundary | 42,771      | 44,349      | 3.7                   | 45,585      | 47,000                  |

*Legend:* ROI = region of influence.

*Sources:* Cellarius et al. 2022; USCB 2021, 2023a, 2024a; Vespa et al. 2020.

### Employment and Earnings

Table 3.5-2 shows employment and income data for the ROI as reported for April 2024.

**Table 3.5-2 Employment and Income in the ROI**

| <i>Area</i>    | <i>Civilian Labor Force</i> | <i>Unemployment Rate (percent) April 2024</i> | <i>Number of Households 2017–2022</i> | <i>Persons per Household 2017–2022</i> | <i>Median Household Income 2017–2022</i> |
|----------------|-----------------------------|-----------------------------------------------|---------------------------------------|----------------------------------------|------------------------------------------|
| United States  | 266,801,000                 | 4.1                                           | 125,136,353                           | 2.65                                   | \$75,149                                 |
| Oregon         | 2,157,280                   | 4.2                                           | 1,680,800                             | 2.52                                   | \$76,632                                 |
| Klamath County | 29,952                      | 5.4                                           | 28,166                                | 2.49                                   | \$57,219                                 |

*Legend:* ROI = region of influence.

*Sources:* Bureau of Labor Statistics 2024; State of Oregon 2024; USCB 2024b, 2024c.

The number of persons per household in Klamath County and Oregon is about 2.5; slightly lower than the U.S. of 2.65 persons per household (Table 3.5-2) (U.S. Census Bureau [USCB] 2024a). Median household income for workers in Klamath County in 2023 was about \$57,200; which is approximately 25 percent lower than state and national levels.

The Klamath County Economic Development Office describes Kingsley Field ANGB as a “foundation” of the Klamath County economy, with an annual economic contribution of more than \$100 million (Klamath County 2019). In FY 2021 (October 1, 2021 to September 30, 2022), 1,144 people were employed at Kingsley Field ANGB (173 FW n.d.). Consistent with the Chapter 3 analytical approach, these figures are provided to characterize the Existing Conditions (2023) used for comparative analysis; they are not intended to represent current-day 173 FW fighter operations. With a total annual payroll of almost \$75 million, the estimated average annual income for these employees amounted to more than \$66,000 (15 percent higher than the county median household income). Construction and maintenance spending at Kingsley Field ANGB was about \$28 million and supported an additional 130 jobs (Klamath County 2019).

### Housing

Between 2017–2022, Klamath County had about 34,000 housing units and a total vacancy rate of about 14 percent, as shown in Table 3.5-3 (USCB 2024d). However, the rental vacancy rate in Klamath County (about 2 percent), is approximately half that of Oregon (3.7 percent). The median value of owner-occupied housing units in Klamath County was about \$234,000, which is approximately half the median value of homes in Oregon overall. Klamath County also had gross rent values about two-thirds of those of the state of Oregon (\$920 per month compared to \$1,400 per month) (USCB 2024d).

**Table 3.5-3 Housing in the ROI (2017–2022)**

| <i>Area</i>    | <i>Total Housing Units</i> | <i>Total Vacancy Rate (percent)</i> | <i>Rental Vacancy Rate (percent)</i> | <i>Median Value of Owner-Occupied Housing Units</i> | <i>Median Monthly Gross Rent</i> |
|----------------|----------------------------|-------------------------------------|--------------------------------------|-----------------------------------------------------|----------------------------------|
| United States  | 140,943,613                | 11                                  | 5.5                                  | \$281,900                                           | \$1,268                          |
| Oregon         | 1,818,599                  | 8                                   | 3.7                                  | \$423,100                                           | \$1,373                          |
| Klamath County | 33,864                     | 14                                  | 2.0                                  | \$234,200                                           | \$921                            |

*Legend:* ROI = region of influence.

*Source:* USCB 2024d.

A recent Housing Needs Assessment for Klamath County reports that more than 800 housing units are needed over the next 20 years to meet anticipated housing needs, with half of those units going to households earning less than 50 percent of median family income in Klamath County (Cellarius et al. 2022).

### *Economic Characteristics*

One of the major factors cited by Klamath County leaders that would enhance economic development in the ROI would be to re-establish commercial air service to LMT (Klamath County 2019). In 2017, Peninsula Airway, Inc. stopped service to Klamath Falls making Rogue Valley International-Medford Airport located 70 miles from Klamath Falls the closest commercial airport. While it is unlikely that commercial service will return to Klamath Falls in the near term, Kingsley Field is recognized as an important asset driving economic growth.

The travel industry is one of the top three export-oriented industries in rural Oregon counties such as Klamath (Klamath County 2019). Since 2020, the leisure and hospitality sector is one of the growth employment sectors in Klamath County (State of Oregon 2024). Klamath Falls is considered to be a gateway community for Crater Lake National Park. Regional tourism is driven by visitation to Crater Lake National Park, which was down to about one-half million people annually after the pandemic (National Park Service [NPS] 2024a).

#### 3.5.1.3 Protection of Children and Elderly

Executive Order (EO) 13045, *Protection of Children from Environmental Health Risks and Safety Risks* (1997), directs federal agencies to “identify and assess environmental health risks and safety risks that may disproportionately affect children,” and to “ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.” Children are defined as individuals under 18 years of age, and the elderly are defined as individuals 65 years and older.

Due to their physiological and behavioral traits, children may be more susceptible and vulnerable to environmental health and safety risks than adults. Areas where children spend significant time or gather in concentrated numbers are considered areas of potential increased risk.

The ROI for the potential effects to children and the elderly includes census block groups affected by noise generated at the airfield. Demographic data for communities under military training airspace were not assessed, as changes in noise levels are not expected to significantly impact these areas.



Table 3.5-4 displays the total population and demographic data in the U.S., the state of Oregon, and in Klamath County (the ROI).

**Table 3.5-4 Total Population and Demographic Data in the ROI**

| <i>Geographic Area</i> | <i>Total Population</i> | <i>Children Under 18</i> | <i>Percent Children Under 18</i> | <i>Elderly</i> | <i>Percent Elderly</i> |
|------------------------|-------------------------|--------------------------|----------------------------------|----------------|------------------------|
| United States          | 331,097,593             | 73,213,705               | 22.1                             | 54,737,648     | 16.5                   |
| Oregon                 | 4,229,374               | 855,978                  | 20.2                             | 773,258        | 18.3                   |
| Klamath County         | 69,506                  | 15,116                   | 21.7                             | 14,909         | 21.4                   |

*Legend:* ROI = region of influence.

*Source:* USCB 2023b.

Table 3.5-5 displays the same information for populations affected by the Existing Conditions (2023) noise contours associated with the F-15C/D aircraft and the planning horizon for alternatives comparison. As shown, the percentage of the population within the DNL 65 dB noise contours that are children under the age of 18 or elderly is higher than the U.S. average and the state of Oregon.

**Table 3.5-5 Total Existing Conditions (2023) Population and Demographic Data for Areas Affected by Noise Greater than DNL 65 dB**

| <i>Noise Contour</i> | <i>Affected Population</i> | <i>Children Under 18</i> | <i>Percent Children Under 18</i> | <i>Elderly</i> | <i>Percent Elderly</i> |
|----------------------|----------------------------|--------------------------|----------------------------------|----------------|------------------------|
| 65–70                | 1,851                      | 516                      | 27.9                             | 371            | 20.0                   |
| 70–75                | 834                        | 235                      | 28.2                             | 176            | 21.1                   |
| 75–80                | 262                        | 74                       | 28.2                             | 56             | 21.4                   |
| 80–85                | 0                          | 0                        | 0                                | 0              | 0                      |
| 85+                  | 0                          | 0                        | 0                                | 0              | 0                      |
| Total                | 2,947                      | 825                      | 28.0                             | 603            | 20.5                   |

*Note:* Existing Conditions (2023) data used for analysis is not intended to represent current-day 173 FW fighter operations.

*Legend:* dB = decibel; DNL = Day-Night Average Sound Level.

*Sources:* USCB 2022a, 2022b, 2023c.

Residential areas are locations where children live and would spend a large amount of their time. Schools and childcare facilities are identified as locations where children are likely to be present in concentrated numbers and may be vulnerable to effects. Similarly elderly populations are likely to be present in concentrated numbers in residential areas, elder care, and medical facilities.

### **3.5.2 Environmental Consequences**

Socioeconomics are evaluated in the context and intensity of the Proposed Action and No Action Alternative, focusing on population and employment trends and associated demands on housing, infrastructure, and public services to the extent they inform the environmental analysis.

#### **3.5.2.1 No Action Alternative**

##### *Socioeconomics*

Under the No Action Alternative, F-35A aircraft would not be based at Kingsley Field ANGB, and associated training and construction activities would not occur. Construction and repair projects

necessary to support ongoing base operations would be implemented. The No Action Alternative is retained as the modeled “not implementing the Proposed Action” scenario for comparison purposes. As discussed in Section 2.2, airfield operations were already expected to decline due to aging F-15C/D aircraft, reducing annual operations and maintenance spending over time.

These reductions could result in slight declines in employment, annual spending, and capital investment, which could slow growth in population, employment, or earnings within the ROI. These effects would be adverse but would not be expected to be significant in the near term based on the scale of the projected changes.

#### Protection of Children and Elderly

Under the modeled No Action Alternative, reduced 173 FW fighter operations would decrease noise exposure relative to Existing Conditions (2023), as described in Section 3.2.2. Consequently, both the acreage and number of people within the DNL 65 dB noise contour would decrease (Table 3.5-6), including approximately 599 fewer people overall, 167 fewer children under 18, and 117 fewer elderly persons. While fewer individuals would be exposed to high noise levels, the proportion of children under 18 within the contour would remain higher than in Klamath County as a whole, meaning children would continue to be disproportionately affected by noise. The proportion of elderly residents would be lower than the county average; therefore, no disproportionate impact to the elderly population is anticipated.

**Table 3.5-6 Total No Action Population and Demographic Data for Areas Affected by Noise Greater than DNL 65 dB**

| <i>Noise Contour</i> | <i>Affected Population</i> | <i>Children Under 18</i> | <i>Percent Children Under 18</i> | <i>Elderly</i> | <i>Percent Elderly</i> |
|----------------------|----------------------------|--------------------------|----------------------------------|----------------|------------------------|
| 65–70                | 1,459                      | 407                      | 27.9                             | 296            | 20.3                   |
| 70–75                | 744                        | 210                      | 28.2                             | 158            | 21.2                   |
| 75–80                | 145                        | 41                       | 28.3                             | 31             | 21.4                   |
| 80–85                | 0                          | 0                        | 0                                | 0              | 0                      |
| 85+                  | 0                          | 0                        | 0                                | 0              | 0                      |
| Total                | 2,348                      | 658                      | 28.0                             | 485            | 20.7                   |

*Note:* “No Action” values reflect the No Action scenario used for comparison (based on the Existing Conditions [2023] dataset) and are not intended to represent current-day 173 FW fighter operations.

*Legend:* dB = decibel; DNL = Day-Night Average Sound Level.

*Sources:* USCB 2022a, 2022b, 2023c.

### 3.5.2.2 Proposed Action Alternative

#### Socioeconomics

The socioeconomic effects of the Proposed Action are based on proposed personnel changes, spending patterns, and one-time capital investments for construction at LMT/Kingsley Field ANGB. Approximately 30 contract personnel would be added to support security, system administration, training, and simulator operations, representing a 2.7 percent increase relative to Existing Conditions (2023). This discussion focuses on the incremental change associated with the Proposed Action and does not rely on current-day fighter operations at Kingsley Field ANGB.

Military airfield operations would increase by 29 percent, with a proportional increase in annual operations and maintenance spending—estimated at \$10 million to \$15 million—supporting

approximately 30 to 40 additional secondary jobs in the ROI (Klamath County 2019). Between 2026 and 2040, total capital investment is projected at approximately \$300 million, with most expenditures occurring from 2026 through 2035.

The changes resulting from this personnel increase would not be significant, as the growth falls within the expected population growth. Induced effects from sales and property taxes paid by base employees and contractors would likely offset infrastructure and service costs associated with a larger population. The addition of 30 higher-paying contract positions would not be expected to strain the local housing market, as vacancy rates are sufficient to accommodate the increase in housing demand (see also Table 3.5-3). Klamath County economic development specialists have identified the F-35A beddown as a desirable source of high-tech growth (Klamath County 2019).

Regional economic changes from increased maintenance spending and capital investment would be beneficial to the ROI by supporting additional jobs in the local economy.

#### *Protection of Children and Elderly*

Under the Proposed Action, a total projected population of 4,629 would experience noise levels greater than DNL 65 dB as shown in Table 3.5-7. Consistent with the methodology described in Section 3.2, population and demographic estimates are derived from census block-group data scaled by the portion of each block group within the modeled DNL contour bands, assuming uniform distribution.

For the DNL 80 dB and greater contour bands, the block-group scaling method can overstate residential exposure where development is sparse. Therefore, the DNL 80 dB and greater area was reviewed manually using aerial imagery. This review confirmed that the area contains a single residence. Consequently, the affected population for DNL 80 dB and greater is 3 people, rather than the 210 persons that would be estimated using block-group scaling, and the percentages of children and elderly were adjusted to reflect the verified residential occupancy. Additional information on effects associated with DNL 80 dB is provided in Section 3.2.2.2.

The percentage of this affected population that are children under the age of 18 or elderly is also shown in Table 3.5-7. Children under 18 and the elderly are mutually exclusive age categories; however, these demographic categories may overlap with other population characteristics not evaluated here.

**Table 3.5-7 Total Proposed Action Population, Children, and Elderly Populations  
Affected by Noise Greater than DNL 65 dB**

| <i>Noise Contour</i> | <i>Affected Population</i> | <i>Children Under 18</i> | <i>Percent Children Under 18</i> | <i>Elderly</i> | <i>Percent Elderly</i> |
|----------------------|----------------------------|--------------------------|----------------------------------|----------------|------------------------|
| 65–70                | 2,953                      | 823                      | 27.9                             | 571            | 19.3                   |
| 70–75                | 1,030                      | 286                      | 27.8                             | 208            | 20.2                   |
| 75–80                | 643                        | 182                      | 28.3                             | 137            | 21.3                   |
| 80–85                | 3                          | 0                        | 0                                | 0              | 0                      |
| 85+                  | 0                          | 0                        | 0                                | 0              | 0                      |
| <b>Total</b>         | <b>4,629</b>               | <b>1,291</b>             | <b>27.8</b>                      | <b>916</b>     | <b>19.8</b>            |

*Note:* <sup>1</sup>The DNL 80–85 dB contour area was reviewed using aerial imagery to verify residential occupancy. The census block-group scaling method can overestimate population in sparsely developed areas; therefore, the affected population for the DNL 80–85 dB band reflects the single verified residence (3 persons).

*Legend:* dB = decibel; DNL = Day-Night Average Sound Level.

*Sources:* USCB 2022a, 2022b, 2023c.

As shown in Table 3.5-8, the percentage of children under age of 18 within the DNL 65 dB and greater noise contour area under the Proposed Action (27.8 percent) is higher than the percentage within the reference community of Klamath County (21.7 percent) but would remain consistent with Existing Conditions (2023) and the No Action Alternative. Although the Proposed Action increases the total number of children exposed to noise, this increase reflects a uniform outward expansion of the noise contour over general residential areas, rather than disproportionate impacts concentrated on schools, childcare facilities, or child-dense neighborhoods. Because this expansion affects the general population uniformly within the contour, the Proposed Action would not result in disproportionately high and adverse effects on children. The percentage of elderly persons within the DNL  $\geq 65$  dB contour (19.8 percent) is lower than the reference community (21.4 percent); therefore, no disproportionate impact to the elderly population would be anticipated.

**Table 3.5-8 Portion of Klamath County Population Experiencing Noise Levels Greater than DNL 65 dB**

| <i>Geographic Area</i>                                        | <i>Total Population</i> | <i>Percent Children</i> | <i>Percent Elderly</i> |
|---------------------------------------------------------------|-------------------------|-------------------------|------------------------|
| Klamath County                                                | 69,506                  | 21.7                    | 21.4                   |
| Existing Conditions (2023) Population with noise > DNL 65 dBA | 2,947                   | 28.0                    | 20.5                   |
| No Action Population with noise > DNL 65 dBA                  | 2,348                   | 28.0                    | 20.7                   |
| Proposed Action Population with noise > DNL 65 dBA            | 4,629                   | 27.8                    | 19.8                   |
| Difference Between Proposed Action and No Action Alternative  | 2,281                   | -0.2                    | -0.9                   |

*Note:* “Population with noise > DNL 65 dBA” values are derived by overlaying modeled DNL  $\geq 65$  dB contours with census block-group demographic data (see Section 3.2 and Tables 3.5-5 through 3.5-7). “Difference Between Proposed Action and No Action Alternative” is calculated as Proposed Action minus No Action. Percent Children and Percent Elderly differences are percentage-point changes (not percent change).

*Legend:* > = greater than; dB = decibel; dBA = A-weighted decibel; DNL = Day-Night Average Sound Level.

*Source:* USCB 2024b.

### **3.5.3 Reasonably Foreseeable Actions and Environmental Trends**

#### **3.5.3.1 Socioeconomics**

No reasonably foreseeable actions have been identified that would result in additional effects on socioeconomic resources. Socioeconomic conditions in Klamath County are expected to continue to reflect existing population and economic trends. Klamath County’s population is projected to increase from approximately 70,200 residents in 2022 to approximately 71,600 residents by 2040, with growth expected to be concentrated primarily within the Klamath Falls Urban Growth Boundary. These projected changes represent background socioeconomic trends that could occur irrespective of implementation of the Proposed Action.

Under the No Action Alternative, these background trends would be expected to continue without the employment, spending, and investment associated with the Proposed Action. Under the Proposed Action, socioeconomic effects associated with changes in personnel, operations and maintenance spending, and capital investment are evaluated in Section 3.5.2.2.

No other socioeconomic trends have been identified that would be expected to materially alter the socioeconomic conditions evaluated under the Proposed Action or the No Action Alternative.

#### **3.5.3.2 Protection of Children and Elderly**

No reasonably foreseeable actions have been identified that warrant additional consideration for potential effects on children or the elderly. Overall population growth within Klamath County is projected to continue during the period of analysis; however, available population forecasts do not indicate whether the proportion or geographic distribution of children or elderly populations within the ROI would materially change. Therefore, no demographic trend has been identified that would alter the analysis of these populations.

### **3.6 LAND USE/NOISE COMPATIBLE LAND USE**

#### **3.6.1 Affected Environment**

The ROI for land use includes LMT/Kingsley Field ANGB, and adjacent areas. LMT/Kingsley Field ANGB lies 5 miles south of Klamath Falls in south central Oregon (see Figure 1.1-1). The 254-acre base is leased by the federal government from the City of Klamath Falls for exclusive military use and licensed to the State of Oregon for Oregon ANG operations. It occupies the western portion of LMT and the 173 FW uses the civil airfield for military aircraft training (see Figure 1.1-2).

The City of Klamath Falls LMT Master Plan Update (City of Klamath Falls 2021) includes a comprehensive plan and goals for long-term airport development, anticipated land use, and an airport layout map. Additionally, the City of Klamath Falls Urban Area Comprehensive Plan (City of Klamath Falls 2022) provides a guide for land use decision-making and incorporates relevant goals, objectives, and implementation measures. These relevant land use plans also identify zoning and other land use planning restrictions or planned lease/development at, adjacent, or near LMT. The land development code specifies permitting requirements, subdivisions, rezoning, and development standards, including permitted and conditional uses for zones surrounding LMT. Surrounding areas are primarily agricultural to the west, south, and east, with industrial, commercial, and residential uses to the north and northeast. The “unknown” land use designation includes water resources, public roadways, and other areas not assigned a specific category. Non-Resource lands are not zoned for agricultural or forest.

Noise sensitive land uses typically include residential uses, public service facilities, and cultural or recreation spaces such as parks and open space. Ambient noise levels surrounding LMT/Kingsley Field ANGB are characteristic of airport environments, with sources including aircraft, roads, commercial activity, and residential areas. Due to the accelerated divestment of the 173 FW F-15C/D fleet, current ambient noise levels are temporarily lower than Existing Conditions (2023) levels described below.

Under the Existing Conditions (2023), aircraft noise from LMT affected approximately 2,789 acres of agricultural, industrial, commercial, public, unknown, and residential land adjacent to LMT at noise levels between DNL 65 dB and DNL 85 dB. While this acreage reflects the 2023 operational profile used for consistent modeling, it does not represent current-day noise exposure, which has decreased following the cessation of regular 173 FW F-15C/D flying operations. Section 3.2, describes existing noise at POIs, including schools and churches, within these contours. Noise

contours extend primarily northwest and southeast of the airport. North of the airport, DNL 65 dB and higher contours overlap residential, commercial, and industrial uses; to the west, east and south, they overlap agricultural uses.

At and around commercial and military airfields, specific siting criteria address development density and safety. Accident Potential Zones (APZs) and Runway Protection Zones (RPZs) are used to reduce aircraft-related hazards. FAA Advisory Circular 150/5300-13B, *Airport Design*, Section 1.5.82 defines an RPZ as an area at ground level before a runway threshold or beyond a runway end to protect people and property. Runway 08/26 RPZs extend beyond airport property over farmland. The southeastern RPZ for Runway 14/32 extends over farmland, while the northern RPZ overlaps commercial and industrial uses.

A designated military munitions storage area (MSA) is present near the northeastern portion of ANG-leased property for the storage of hazardous materials including ordnance and explosives. The 173 FW has identified a quantity-distance (QD) arc to identify the area in which there is a potential safety risk associated with the unlikely explosion of stored munitions. The QD arc extends to an area within a 1,250-foot radius of the MSA and encompasses approximately 27 acres of agricultural area east of LMT and west of the railroad track. The City of Klamath Falls and LMT lease agreement with the Oregon ANG prohibits any construction within the QD arc located on off-base property (City of Klamath Falls 2021).

### **3.6.2 Environmental Consequences**

The land use analysis evaluates the compatibility of the Proposed Action and No Action Alternative against Existing Conditions (2023). Because regular 173 FW F-15C/D flight operations have already ceased, the community is currently experiencing a temporary reduction in noise-incompatible land use acreage. Using the Existing Conditions (2023) ensures a conservative comparison by measuring the F-35A mission against the most recent fully operational F-15C/D profile rather than the current temporary period of reduced activity.

#### **3.6.2.1 No Action Alternative**

Under the No Action Alternative, military aircraft operations by the 173 FW would decrease from Existing Conditions (2023) to approximately 2,400 annual sorties (9,600 annual operations), a 29 percent reduction. Contract ADAIR aircraft, military transients, and other agency transients are assumed to remain consistent. Civil aircraft operations at LMT are projected to increase by approximately 8 percent to 26,102 annual operations. While civil operations increase, the larger reduction in military operations results in a net 4.7 percent decrease in total combined civil and military airfield operations (to 39,100 annually) relative to Existing Conditions (2023).

Because the No Action Alternative is the analytical scenario for comparison if the Proposed Action is not implemented, the land use analysis focuses on changes in modeled noise exposure and land use compatibility relative to Existing Conditions (2023), rather than current-day operational status. Under the No Action Alternative, approximately 698 acres of land adjacent to LMT are exposed to noise levels of DNL 65 dB or greater and are considered non-compatible. This includes 416 acres of residential land (representing 946 non-compatible residential properties/households), 270 acres of commercial and industrial land, and 12 acres of public land.

### 3.6.2.2 Proposed Action Alternative

The beddown of the F-35A at Kingsley Field ANGB would fully align with state, regional, and local conservation plans, development plans, and zoning regulations. To ensure analytical consistency, local land use categories were consolidated or renamed. Table 3.6-1 cross-references county classifications and those used in this analysis.

**Table 3.6-1 Land Use Categories**

| <i>Klamath County Land Use Classification</i> | <i>Land Use Classification</i> |
|-----------------------------------------------|--------------------------------|
| General Commercial                            | Commercial                     |
| Rural Community Commercial                    | Commercial                     |
| Neighborhood Commercial                       | Commercial                     |
| Transportation Commercial                     | Commercial                     |
| Exclusive Farm Use                            | Agriculture                    |
| Exclusive Farm Use - Cropland                 | Agriculture                    |
| Industrial                                    | Industrial                     |
| Heavy/Light Industrial                        | Industrial                     |
| Rural Community Industrial                    | Industrial                     |
| Non-Resource                                  | Non-Resource                   |
| Public Facility                               | Public                         |
| Planned Unit Development                      | Public                         |
| Rural Residential                             | Residential                    |
| High Density Residential                      | Residential                    |
| Low Density Residential                       | Residential                    |
| Apartment Residential                         | Residential                    |
| Medium Density Residential                    | Residential                    |
| Suburban Residential                          | Residential                    |
| Single Family Residential                     | Residential                    |
| Not classified                                | Unknown                        |

*Note:* The “not classified/unknown” land use designation includes water resources and public roadways, in addition to miscellaneous areas of land within the study area that the County of Klamath has not designated as a specific land use category.

*Source:* Klamath County 2020.

### Construction Effects

The areas immediately surrounding LMT/Kingsley Field ANGB are primarily agricultural and industrial and would not be affected by proposed construction, renovations, or demolitions, as all work would occur within base boundaries. Construction would be short term and intermittent, with potential minor traffic and noise disruptions for local businesses and base personnel. Construction activities would occur during standard business hours (7 a.m. to 5 p.m. [0700 to 1700], Monday through Friday) and would temporarily affect operations. Upon completion, the improvements would enhance efficiency and security for the 173 FW. All facilities would be sited and designed to remain compatible with existing land uses and safety guidelines.

### Operational Effects

With the F-35A, total annual operations at LMT would increase by approximately 29 percent compared to the No Action Alternative (from 39,100 to 50,280). The land use analysis compares the modeled noise contours of the Proposed Action to the No Action Alternative to assess changes in noise exposure and land use compatibility (Table 3.6-2).



**Table 3.6-2 Land Use Affected (Acres) by Noise Levels DNL 65 dB and Greater: Existing Conditions (2023), No Action Alternative, Proposed Action**

| <i>Land Use Category</i> | <i>Existing Conditions (2023) DNL 65–70 dB (acres)</i> | <i>No Action DNL 65–70 dB (acres)</i> | <i>Change in Acres from Existing Conditions (2023)/ No Action 65–70 dB</i> | <i>Proposed DNL 65–70 dB (acres)</i> | <i>Change in Acres from Proposed/ Existing Conditions (2023) 65–70 dB</i> | <i>Change in Acres from Proposed/ No Action 65–70 dB</i> |
|--------------------------|--------------------------------------------------------|---------------------------------------|----------------------------------------------------------------------------|--------------------------------------|---------------------------------------------------------------------------|----------------------------------------------------------|
| Residential              | 341                                                    | 306                                   | -35                                                                        | 341                                  | 0                                                                         | 35                                                       |
| Commercial               | 51                                                     | 32                                    | -19                                                                        | 106                                  | 55                                                                        | 74                                                       |
| Industrial               | 251                                                    | 180                                   | -71                                                                        | 389                                  | 138                                                                       | 209                                                      |
| Agricultural             | 1,085                                                  | 851                                   | -234                                                                       | 1,595                                | 510                                                                       | 744                                                      |
| Unknown <sup>1</sup>     | 217                                                    | 186                                   | -31                                                                        | 332                                  | 115                                                                       | 146                                                      |
| Public                   | 5                                                      | 4                                     | -1                                                                         | 23                                   | 18                                                                        | 19                                                       |
| <b>Total</b>             | <b>1,950</b>                                           | <b>1,558</b>                          | <b>-391</b>                                                                | <b>2,787</b>                         | <b>836</b>                                                                | <b>1,227</b>                                             |
| <i>Land Use Category</i> | <i>Existing Conditions (2023) DNL 70–75 dB (acres)</i> | <i>No Action DNL 70–75 dB (acres)</i> | <i>Change in Acres from Existing Conditions (2023)/ No Action 70–75 dB</i> | <i>Proposed DNL 70–75 dB (acres)</i> | <i>Change in Acres from Proposed/ Existing Conditions (2023) 70–75 dB</i> | <i>Change in Acres from Proposed/ No Action 70–75 dB</i> |
| Residential              | 145                                                    | 110                                   | -35                                                                        | 250                                  | 105                                                                       | 140                                                      |
| Commercial               | 9                                                      | 10                                    | +1                                                                         | 15                                   | 6                                                                         | 5                                                        |
| Industrial               | 49                                                     | 28                                    | -21                                                                        | 105                                  | 56                                                                        | 77                                                       |
| Agricultural             | 366                                                    | 292                                   | -74                                                                        | 663                                  | 197                                                                       | 371                                                      |
| Unknown <sup>1</sup>     | 108                                                    | 87                                    | -21                                                                        | 155                                  | 47                                                                        | 68                                                       |
| Public                   | 2                                                      | 3                                     | +1                                                                         | 3                                    | 1                                                                         | 0                                                        |
| <b>Total</b>             | <b>679</b>                                             | <b>529</b>                            | <b>-149</b>                                                                | <b>1,192</b>                         | <b>412</b>                                                                | <b>661</b>                                               |
| <i>Land Use Category</i> | <i>Existing Conditions (2023) DNL 75–80 dB (acres)</i> | <i>No Action DNL 75–80 dB (acres)</i> | <i>Change in Acres from Existing Conditions (2023)/ No Action 70–75 dB</i> | <i>Proposed DNL 75–80 dB (acres)</i> | <i>Change in Acres from Proposed/ Existing Conditions (2023) 75–80 dB</i> | <i>Change in Acres from Proposed/ No Action 75–80 dB</i> |
| Residential              | 7                                                      | 0                                     | -7                                                                         | 92                                   | 85                                                                        | 92                                                       |
| Commercial               | 26                                                     | 21                                    | -5                                                                         | 6                                    | -20                                                                       | -15                                                      |
| Industrial               | 2                                                      | 0                                     | -2                                                                         | 26                                   | 24                                                                        | 26                                                       |
| Agricultural             | 95                                                     | 55                                    | -40                                                                        | 240                                  | 145                                                                       | 185                                                      |
| Unknown <sup>1</sup>     | 19                                                     | 9                                     | -10                                                                        | 68                                   | 49                                                                        | 59                                                       |
| Public                   | 5                                                      | 4                                     | -1                                                                         | 3                                    | -2                                                                        | -1                                                       |
| <b>Total</b>             | <b>154</b>                                             | <b>89</b>                             | <b>-65</b>                                                                 | <b>435</b>                           | <b>281</b>                                                                | <b>346</b>                                               |

|                      | <i>Existing<br/>Conditions<br/>(2023) DNL<br/>80+ dB<br/>(acres)</i> | <i>No Action DNL<br/>80+ dB<br/>(acres)</i> | <i>Change in<br/>Acres from<br/>Existing<br/>Conditions<br/>(2023)/<br/>No Action<br/>80+ dB</i> | <i>Proposed DNL<br/>80+ dB<br/>(acres)</i> | <i>Change in<br/>Acres from<br/>Proposed/<br/>Existing<br/>Conditions<br/>(2023) 80+<br/>dB</i> | <i>Change in<br/>Acres from<br/>Proposed/<br/>No Action<br/>80+ dB</i> |
|----------------------|----------------------------------------------------------------------|---------------------------------------------|--------------------------------------------------------------------------------------------------|--------------------------------------------|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| Residential          | 0                                                                    | 0                                           | 0                                                                                                | 5                                          | 5                                                                                               | 5                                                                      |
| Commercial           | 0                                                                    | 0                                           | 0                                                                                                | 24                                         | 24                                                                                              | 24                                                                     |
| Industrial           | 0                                                                    | 0                                           | 0                                                                                                | 1                                          | 1                                                                                               | 1                                                                      |
| Agricultural         | 3                                                                    | 1                                           | -2                                                                                               | 49                                         | 46                                                                                              | 48                                                                     |
| Unknown <sup>1</sup> | 1                                                                    | 0                                           | -1                                                                                               | 8                                          | 7                                                                                               | 8                                                                      |
| Public               | 1                                                                    | 1                                           | 0                                                                                                | 5                                          | 4                                                                                               | 4                                                                      |
| <b>Total</b>         | <b>5</b>                                                             | <b>2</b>                                    | <b>-3</b>                                                                                        | <b>91</b>                                  | <b>87</b>                                                                                       | <b>90</b>                                                              |

Notes: Numbers may not add up due to rounding.

<sup>1</sup>The “unknown” designation includes water resources, public roadways, and miscellaneous areas not assigned to a specific category by Klamath County.

Legend: dB = decibel; DNL = Day-Night Average Sound Level.

Residential exposure would increase by 35 acres in the DNL 65 to 70 dB contour, 140 acres in the DNL 70 to 75 dB contour, 92 acres in the DNL 75 to 80 dB contour, and 5 acres in the DNL 80 to 85 dB contour, based on analytical comparison of the modeled Proposed Action to the modeled No Action Alternative. Overall, total non-compatible land adjacent to LMT would increase to approximately 1,396 acres, representing a net increase of 698 acres over the No Action Alternative. Non-compatible residential land would increase to 688 acres, representing 1,865 non-compatible residential properties/households (a net increase of 919 properties).

The remaining non-compatible acreage consists of 673 acres of commercial and industrial land (an increase of 403 acres) and 35 acres of public land (an increase of 23 acres). Noise levels greater than DNL 65 dB are considered non-compatible with residential uses under DoW and FAA guidelines.

### **3.6.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that warrant additional consideration for land use or noise-compatible land use. Areas surrounding LMT are primarily agricultural to the west, south, and east, with industrial, commercial, and residential development concentrated to the north and northeast. No other land use trends have been identified that would be expected to materially alter the land use or noise-compatible land use conditions evaluated under the Proposed Action or the No Action Alternative.

## **3.7 WATER RESOURCES/FLOODPLAINS/WILD AND SCENIC RIVERS**

### **3.7.1 Affected Environment**

Water resources evaluated in this analysis include surface water, groundwater, and floodplains. There are no wild and scenic rivers (or river segments) designated anywhere near LMT/Kingsley Field ANGB based on Wild and Scenic Rivers designations as of 2024 (NPS 2024b). The closest wild and scenic river is the Klamath River, about 25 miles southwest of Klamath Falls. The portion of the Klamath River that is designated as wild and scenic begins at the J.C. Boyle Powerhouse and extends to the California-Oregon border (NPS 2024b).

The ROI includes water in and around LMT/Kingsley Field ANGB. Mapped designations and regulatory listings (e.g., Wild and Scenic Rivers status, Clean Water Act impairments, Federal Emergency Management Agency [FEMA] flood layers, and permit status) reflect the most current sources available at the time of analysis (2024) and may change over time. Wetlands are addressed in Section 3.12. Water resources under military training airspace used by the 173 FW would not be affected by the Proposed Action and are thus not discussed further in this analysis because the Proposed Action does not include ground disturbance or other activities within the military training airspace that could affect surface water, groundwater, or floodplains.

#### 3.7.1.1 Surface Water

LMT/Kingsley Field ANGB lies within the Lost River drainage basin. The Lost River Diversion Channel, located just south of the primary runway, connects the Klamath and Lost Rivers approximately 3 miles south of Klamath Falls. This major hydrologic feature has little influence on surface hydrology at LMT/Kingsley Field ANGB due to extensive modifications from airfield construction and the U.S. Bureau of Reclamation's Klamath Project drainage and irrigation system. Channel flow direction varies: eastward during irrigation season, and westward toward Klamath Falls during high winter runoff (NGB 2024d). In Klamath County, the Lost River is EPA-listed as impaired for dissolved oxygen, pH, and temperature under the Clean Water Act, making it the only impaired waterbody near the base as of the 2024 listing (EPA 2024b).

Stormwater at Kingsley Field ANGB is managed through gravity sewers, surface inlets, culverts, earthen channels, and a network of drainage ditches that cross the airfield via an underground aqueduct before discharging to the Lost River (NGB 2024d). The base operates under Oregon DEQ's National Pollutant Discharge Elimination System (NPDES) general industrial stormwater permit (No. 1200-Z, File No. 106838) and a Storm Water Pollution Prevention Plan (SWPPP) that implements engineering and management strategies to improve stormwater quality (Oregon ANG 2023b).

#### 3.7.1.2 Groundwater

Groundwater levels near LMT/Kingsley Field ANGB are high, typically ranging from 2 to 10 feet below the surface. Naturally, groundwater levels would be higher; however, the established drainage system effectively lowers the water level and controls the direction of groundwater flow. Local groundwater quality is considered "moderately good," though some wells report elevated methane and iron (NGB 2024d). One municipal well in Klamath Falls has naturally occurring arsenic below regulatory limits and meeting all health standards (City of Klamath Falls 2020). Clay and silt layers in the area limit vertical migration of potentially contaminated shallow groundwater to deeper aquifers (NGB 2024d). Kingsley Field ANGB receives potable water from the City of Klamath Falls, which draws from deep regional aquifers (City of Klamath Falls 2020). No groundwater wells are located within one-quarter mile of the base.

#### 3.7.1.3 Floodplains

All developed portions of Kingsley Field ANGB are located outside any floodplains identified by the FEMA. Kingsley Field ANGB is located within a seclusion zone, or a floodplain exclusion zone, identified by the recent FEMA floodplain layer update for Klamath County (FEMA 2024a).

Extensive modifications to natural drainage patterns at the airport and in its vicinity have been implemented to minimize flooding (FEMA 2024b).

### **3.7.2 Environmental Consequences**

Potential effects on water resources were evaluated considering protection of surface and groundwater during ground-disturbing activities, changes in stormwater runoff and drainage infrastructure, potential disturbance within mapped 100-year floodplains, and proximity to wild and scenic rivers. Adverse effects could occur from substantial floodplain alteration, uncontrolled erosion and sedimentation, or pollutant discharges exceeding Total Maximum Daily Loads (TMDLs) in impaired waters.

#### **3.7.2.1 No Action Alternative**

Under this alternative, stormwater runoff and demand on the airfield drainage system would be expected to increase with up to 331,600 square feet (SF) of new impervious surfaces. In accordance with Unified Facilities Criteria (UFC) 3-210-10, *Low Impact Development (LID)* (as amended, 2010) and Energy Independence and Security Act Section 438, any increase in surface water runoff would be attenuated through the use of drainage management features such as use of bioretention areas, filter strips, vegetated buffers, grassed swales, infiltration trenches, water harvesting, and other applicable BMPs. The integration of LID design concepts incorporates site design and stormwater management to maintain the site's pre-development runoff rates and volumes to further minimize potential adverse effects associated with increases in impervious surface area. Overall, implementation of the No Action Alternative would not be expected to result in significant effects on surface water resources.

Additional impervious surface would slightly reduce local groundwater recharge but would not significantly affect the regional recharge. LID measures would restore predevelopment hydrology to the maximum feasible extent, avoiding adverse effects on groundwater resources.

No construction projects would occur in floodplains; therefore, no effects on floodplains are anticipated.

#### **3.7.2.2 Proposed Action Alternative**

##### *Surface Water*

The Proposed Action would include ground-disturbing activities such as new construction that would disturb up to 933,050 SF. During site preparation (e.g., grading) and construction, soils would be exposed to disturbance and potential compaction, which can impede drainage and reduce infiltration. Construction projects disturbing more than 1 acre would require coverage under the 1200C NPDES Permit pursuant to Oregon Revised Statutes Sections 468B.035 and 050. As part of permit compliance, an Erosion and Sediment Control Plan (ESCP) would be prepared, incorporating BMPs to minimize erosion, runoff, and sedimentation. Stormwater runoff is expected to increase due to up to 704,900 SF of new impervious surfaces, increasing demand on the airfield's drainage system. As detailed in the discussion for the No Action Alternative, Section 3.7.2.1, any increase in surface water runoff would be managed through the integration of LID design concepts and applicable BMPs in accordance with UFC 3-210-10 and Energy Independence and Security Act Section 438. These measures are intended to maintain the site's pre-development

runoff rates and volumes. Post-construction stormwater would be managed under LMT's existing general NPDES permit (No. 1200-Z, File No. 106838) for industrial activities, which covers Kingsley Field ANGB and the airport's SWPPP. Overall, implementation of the Proposed Action would not be expected to result in significant effects on surface water resources.

#### Groundwater

The depth of excavation during construction would generally not reach the depth of groundwater. Should construction activities require trenching or digging greater than a depth of 2 feet, shallow groundwater may be encountered. Dewatering techniques may be required during construction to manage shallow groundwater intrusion and maintain safe working conditions. However, existing clay and silt layers restrict vertical movement between shallow groundwater and the deeper aquifers used for water supply.

The establishment of an additional 704,900 SF of impervious surface area from new facility construction and new areas of pavement would reduce local groundwater recharge capabilities. However, construction is not expected to significantly affect the regional groundwater recharge. LID measures would be implemented to restore predevelopment hydrology to the maximum feasible extent. The addition of 30 personnel at the base would not be expected to affect regional groundwater demand, and none of the proposed facilities or improvements would require a substantial increase in local or regional groundwater use.

#### Floodplains

As noted in Section 3.7.1.3, all construction associated with the Proposed Action would occur within the existing developed footprint of LMT/Kingsley Field ANGB, which is located entirely within a floodplain exclusion zone. There are no mapped floodplains within the base boundary (FEMA 2024a), and none of the proposed construction projects would be located in any floodplains. Therefore, there would be no expected effects on floodplains under the Proposed Action.

All construction would be conducted in compliance with EO 11988, *Floodplain Management*. If construction was proposed within an identified floodplain, a Finding of No Practicable Alternative would be required.

### **3.7.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that warrant additional consideration for water resources, floodplains, or wild and scenic rivers. Water resource conditions within the ROI would continue to be influenced by existing hydrologic conditions, developed drainage infrastructure, surrounding land uses, and applicable federal, state, and local water quality requirements. The Lost River would continue to be subject to applicable Clean Water Act requirements associated with its impaired status, and stormwater discharges from LMT/Kingsley Field ANGB would continue to be managed under applicable Oregon DEQ permitting requirements and the existing SWPPP. Mapped floodplain, water quality, and other regulatory designations may also change over time as agencies update available data and regulatory determinations.

### **3.8 GEOLOGICAL RESOURCES/SOILS/FARMLANDS**

#### **3.8.1 Affected Environment**

The discussion of geological resources includes topography, geology, soils, and farmland associated with the affected environment.

The ROI for the Proposed Action includes the land area on and immediately adjacent to LMT/Kingsley Field ANGB. Geological resources under military training airspace utilized by the 173 FW would not be affected by the Proposed Action and therefore are not discussed further in this analysis.

##### **3.8.1.1 Geology and Topography**

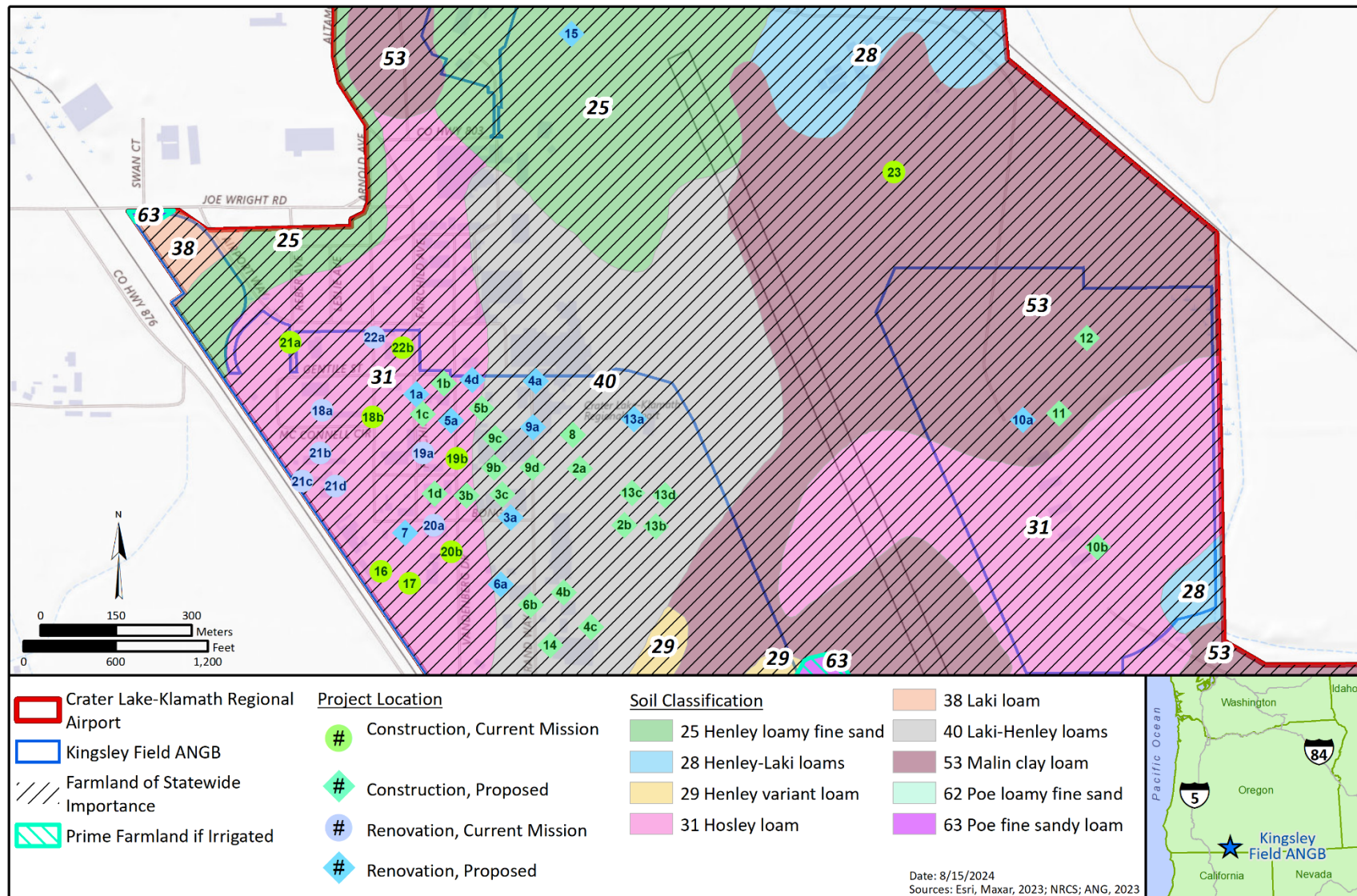
LMT/Kingsley Field ANGB is on a plain that slopes gently to the southeast and is bounded by the surrounding hills associated with northwest-southwest trending faults. The topography at LMT/Kingsley Field ANGB is low-relief terrain with elevations ranging from 4,085 feet MSL to 4,095 feet MSL (NGB 2024d). The geology of the Klamath Falls area consists of unconsolidated to semi-consolidated lacustrine clay, silt, sand, and gravel. Mudflow and fluvial deposits and discontinuous layers of peat occur in places. The Klamath Falls region is a geologically active area related to volcanic activity. Many minor surface fractures traverse within a 33-mile radius of Klamath Falls, continuing the West Klamath Lake fault zone. While no major faults are known to exist directly beneath the base, there is a fault zone and associated shallow geothermal resource located just northeast of base property (NGB 2024d).

##### **3.8.1.2 Soils**

Soils are dominated by the Henley-Poe Laki soil series, with smaller areas of Malin and Hosley soils (NGB 2024d; NRCS 2024). Figure 3.8-1 shows the soils located within Kingsley Field ANGB and proximate to the proposed projects. These soils generally exhibit limitations for certain community uses, such as home sites, small buildings, and roads, due to factors including wetness, potential frost action, slow permeability, and shallow depth to hardpan or the water table. Some areas may also be subject to flooding. Collectively, these characteristics can influence excavation, drainage, and septic system performance (where applicable).

##### **3.8.1.3 Farmland**

NRCS mapping designates the entirety of LMT/Kingsley Field ANGB as soil of “farmland of statewide importance” (NRCS 2024). One small area within the eastern boundary is designated as prime farmland, if irrigated (Figure 3.8-1). Although areas immediately outside the base are zoned by the local municipality for “Exclusive Farm Use,” no soils or areas within the base boundary are actively used for agricultural purposes, and the installation footprint is completely dedicated to airfield and military operations (NRCS 2024).



**Figure 3.8-1 Geological Resources on Kingsley Field ANGB**



### **3.8.2 Environmental Consequences**

#### **3.8.2.1 No Action Alternative**

Limited ground-disturbing activities, such as site preparation and construction would occur under the No Action Alternative. Most naturally occurring soils within LMT/Kingsley Field ANGB have been physically altered (e.g., cut, graded, or covered) or replaced by imported fill to support base development. In compliance with Oregon's erosion and sediment control laws, all appropriate construction BMPs would be implemented during grading where erosion hazards exist. These may include inlet/outlet protections, straw wattles, sediment fences, and other relevant measures.

Construction projects disturbing more than 1 acre would require coverage under the 1200C NPDES Permit coverage pursuant to Oregon Revised Statutes sections 468B.035 and 050, and adherence to the associated ESCP. With all relevant BMPs in place, construction-related soil disturbance would be limited to the project footprints. Dust would be controlled through watering and soil stockpiling as needed to reduce exposure of bare soil. Therefore, the No Action Alternative would not result in significant effects on soils.

NRCS mapping designates most of LMT/Kingsley Field ANGB as farmland of statewide importance, with the exception of one small area designated as prime farmland, if irrigated (see Figure 3.8-1). Consequently, the construction projects identified in Table 2.1-4 under the No Action Alternative would occur on lands carrying this formal soil classification. None of the sustainment construction projects would occur on prime farmland, nor would any convert active farmland to non-agricultural use, as lands comprising LMT/Kingsley Field ANGB have been previously disturbed and are not in active agricultural production. Therefore, implementation of the No Action Alternative would not result in significant effects on farmland.

#### **3.8.2.2 Proposed Action Alternative**

##### *Geology and Topography*

The potential geologic effects associated with the Proposed Action would be limited to ground-disturbing activities such as site preparation and construction. Most construction activities would occur on previously disturbed land capable of supporting such development, and construction effects would not be significant. Proposed construction activities would be localized and would not have significant effects on sensitive or regional geologic or physiographic features.

Topography within the proposed construction areas is level and does not pose an erosion hazard or a development constraint under the proposed construction and demolition activities. Therefore, effects on topography resulting from implementation of the Proposed Action would not be significant.

LMT/Kingsley Field ANGB is located near a fault that has the potential for earthquakes of up to magnitude 9.0 to occur. The proposed buildings would be constructed in accordance with UFC 3-310-04, *Seismic Design for Buildings*, which provides DoW requirements for earthquake-resistant design for new buildings, requirements for evaluating and rehabilitating existing buildings for earthquake resistance, and guidance on applying seismic design principles to specialized structural and non-structural elements. UFC 3-310-04 adopts the seismic design provisions of the 2003 International Building Code for use in DoW building design. Therefore,

implementation of the Proposed Action would not result in significant effects associated with seismicity and geologic hazards.

### Soils

Implementation of the Proposed Action would include excavation and site preparation activities associated with construction. The majority of naturally occurring soils within LMT/Kingsley Field ANGB have been previously altered (e.g., cut, graded, or covered) or replaced with imported fill to support development of the base. Construction activities would be conducted in accordance with the regulatory requirements and BMPs described under the No Action Alternative, Section 3.8.2.1, including compliance with Oregon's erosion and sediment control laws and regulations and coverage under the 1200C NPDES Permit for projects disturbing more than one acre. Dust from construction activities would continue to be minimized through watering, soil stockpiling, and other BMPs, in compliance with local regulations and the Fugitive Emission Control Plan (see Section 3.4 for further discussion). Effects on soils would be localized to the project footprints, and implementation of the Proposed Action would not result in significant effects.

### Farmland

NRCS mapping designates most of LMT/Kingsley Field ANGB as farmland of statewide importance, with the exception of one small area designated as prime farmland, if irrigated (see Figure 3.8-1). Consequently, all proposed construction projects under the Proposed Action would physically occur on lands carrying this formal soil classification. None of the proposed construction projects would occur on prime farmland, nor would any convert active farmland to non-agricultural use, as lands comprising LMT/Kingsley Field ANGB have been previously disturbed and are not in active agricultural production. Therefore, implementation of the Proposed Action would not result in significant effects on farmland.

Once operational, the proposed facilities would have no effect on soils. Proposed projects would incorporate the seismic design requirements of UFC 3-310-04, *Seismic Design for Buildings* to minimize potential effects associated with earthquakes. Erosion would be minimized through applicable design and construction measures. Implementation of the Proposed Action would not result in significant effects on geological resources.

### **3.8.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified in the project area that are sufficiently certain to occur and sufficiently related in time, location, or nature to warrant consideration in the analysis of geological resources, soils, or farmland resources. Geological and soil conditions within the ROI are expected to remain generally unchanged during the period of analysis. Existing development and land management at LMT/Kingsley Field ANGB would continue to influence soil conditions, and mapped farmland classifications would remain applicable unless revised by NRCS. Although most of LMT/Kingsley Field ANGB is mapped as farmland of statewide importance, with one small area designated as prime farmland if irrigated, these areas are within an existing developed and previously disturbed airfield and military installation and are not in active agricultural production.

No environmental trends have been identified that would be expected to substantially alter geological or soil conditions or result in conversion of active farmland to nonagricultural use within the ROI.

### **3.9 CULTURAL RESOURCES**

#### **3.9.1 Affected Environment**

This document uses the terms ‘Pre-Contact’ and ‘Post-Contact’ instead of ‘Pre-Historic’ and ‘Historic’ to refer to the periods before and after European contact with Indigenous peoples. Cultural resources can be broadly defined as Pre-Contact and Post-Contact period sites and districts; structures; artifacts; features that display evidence of human activity; and landscapes and features that play a fundamental role in a specific community’s identity, beliefs, or value system.

Under 36 CFR section 800.16(d), the Area of Potential Effects (APE) means the geographic areas within which the undertaking may directly or indirectly cause alterations in the character or use of historic properties. For purposes of Section 106 consultation, the federal undertaking is the Proposed Action, consisting of the beddown of the F-35A Lightning II aircraft at Kingsley Field ANGB, associated construction, renovation, and demolition activities, and associated aircraft operations within the existing military training airspace. Consistent with this definition, the NGB defined the APE as the jurisdictional boundary of Kingsley Field ANGB, areas within the 65 dB DNL (or greater) noise contour, and lands beneath the existing military training airspace (from the surface to the top of each designation), including a 1-mile horizontal buffer. This APE provides the geographic boundaries used for identifying historic properties and evaluating potential effects. Consultations with State Historic Preservation Officers (SHPOs), Tribal Historic Preservation Officers, and federally recognized Tribes for this undertaking are summarized in Section 3.9.2.2. In addition to consultation conducted under Section 106 of the National Historic Preservation Act (NHPA), the DAF recognizes Tribal sovereignty and conducts government-to-government consultation consistent with EO 13175 and applicable federal policy.

##### **3.9.1.1 Installation**

###### **Archaeological Resources**

Kingsley ANGB maintains an Integrated Cultural Resources Management Plan (ICRMP) to aid in management of cultural resources on the base in accordance with appropriate federal laws and other applicable DAF and ANG policies. The ICRMP is a planning and management tool that outlines base policies and procedures for the protection, management, and preservation of cultural resources including historic properties.

A comprehensive cultural resources survey of the base was conducted between 2000 and 2002. This survey resulted in the identification of one archaeological site (35KL2893), a Post-Contact artifact scatter dating to the late 1930s or early 1940s. Site 35KL2893 is located outside the APE for the current undertaking and was recommended not eligible for listing in the National Register of Historic Places (NRHP). A cultural resources inventory conducted in 2011 at locations outside of the current installation boundary identified one Post-Contact-period archaeological site (35KL2909) and one Post-Contact-period isolate (IF-1). Site 35KL2909 is also located outside the APE and was recommended not eligible for listing in the NRHP. The location of IF-1 could not be determined from available documentation; however, as an isolated find, IF-1 was determined to have no archaeological value.

Because the Proposed Action includes substantial ground disturbance associated with construction, building renovation, modification, and demolition within Kingsley Field ANGB,

NGB conducted an archaeological survey in 2025 in coordination and consultation with the Klamath Tribes and the Oregon SHPO. The survey included 122 shovel test pits (STPs) within proposed construction areas and a 15-meter buffer where non-impervious surfaces could be affected. One STP contained a non-diagnostic metal artifact within disturbed soil associated with the former runway. The deteriorating runway, recorded as Kingsley-SITE-001, was evaluated and determined by NGB to be not eligible for the NRHP due to a lack of integrity and distinguishing characteristics necessary for eligibility (Stantec GS Inc. 2026). The Oregon SHPO concurred with the determination in a letter dated May 19, 2026. No Tribal concerns regarding the site or survey results were received.

The 2025 archaeological survey provides the basis for evaluating effects from Proposed Action construction. The Existing Conditions (2023) noise environment is used separately to characterize the established acoustic setting for purposes of evaluating potential effects associated with Proposed Action aircraft operations.

#### Architectural Resources

In 2002, NGB contracted a cultural resources survey for Kingsley Field ANGB to evaluate 59 built resources constructed between 1941 and 1991. At the time of the survey, five resources were identified as being 50 years of age or older. The remaining 54 resources had not yet reached the historic age threshold but were evaluated under Criteria Consideration G for their association with the Cold War Era. Of the 54 resources evaluated under Criteria Consideration G, 11 were munitions storage facilities and 2 were unaccompanied personnel housing dormitories. These resource types are covered by the Advisory Council on Historic Preservation's Program Comment for World War II and Cold War Era (1939–1974) Ammunition Storage Facilities and Program Comment for Cold War Era Unaccompanied Personnel Housing (1946–1974). The Program Comments provide a programmatic means of satisfying Section 106 requirements for specified management actions affecting covered facilities through historic context studies and representative documentation, rather than requiring separate case-by-case Section 106 review. Based on the results of the 2002 survey, NGB determined Building 400, an Aircraft Alert Hangar built in 1956, to be eligible for listing in the NRHP. At that time, no historic district for Kingsley Field ANGB was identified.

In 2025, NGB conducted an intensive-level architectural survey to evaluate the built environment for eligibility under the criteria established in the NRHP. Based on the results of the survey, NGB determined that Building 219 (maintenance hangar), Building 325 (aircraft shelter), and Building 400 (alert hangar) are each individually eligible for the NRHP under Criteria A and C. Additionally, NGB determined that Buildings 219, 325, and 400 constitute an NRHP eligible historic district identified as the Kingsley Field Alert Hangar Historic District.

#### Traditional Cultural Places and Sacred Sites

No known traditional cultural places or Native American sacred sites have been identified within the installation portion of the APE. The Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of Warm Springs Reservation of Oregon, Cow Creek Band of Umpqua Tribe of Indians, Klamath Tribes, and Modoc Nation have been identified as federally recognized tribes with historical, cultural, or linguistic affiliations to LMT/Kingsley Field ANGB.

### 3.9.1.2 Off-Installation

One historic property, Summers School, is located within the DNL 70 to 75 dB noise contour surrounding the airfield (NPS 2024c, 2024d; Oregon SHPO 2024a, 2024b). The Existing Conditions (2023) noise environment is used to characterize the acoustic setting of this property, providing a conservative basis for evaluating potential effects.

### 3.9.1.3 Military Training Airspace

Table 3.9-1 identifies the NRHP-listed properties and State Historic Landmarks identified beneath the military training airspace used by the 173 FW (NPS 2024c, 2024d). These properties include archaeological sites, historic districts, buildings, structures, objects, trails, and other resource types in California, Idaho, Nevada, and Oregon.

**Table 3.9-1 NRHP Historic Properties and State Historic Land Under the Military Training Airspace**

| <i>Military Training Airspace</i> | <i>Number of Listed NRHP Properties Under Military Training Airspace</i> | <i>Number of State Historic Landmarks Under Military Training Airspace</i> |
|-----------------------------------|--------------------------------------------------------------------------|----------------------------------------------------------------------------|
| <b>California</b>                 |                                                                          |                                                                            |
| Dolphin South MOA                 | 8                                                                        | 7                                                                          |
| Goose North MOA                   | 3 <sup>1</sup>                                                           | 1                                                                          |
| Goose South MOA                   | 13                                                                       | 4                                                                          |
| <b>Idaho</b>                      |                                                                          |                                                                            |
| Jarbridge North MOA               | 1                                                                        | 0                                                                          |
| Owyhee North MOA                  | 1                                                                        | 0                                                                          |
| Paradise North MOA                | 1                                                                        | 0                                                                          |
| <b>Nevada</b>                     |                                                                          |                                                                            |
| Hart B MOA                        | 1 <sup>2</sup>                                                           | 0                                                                          |
| Hart D MOA                        | 0                                                                        | 0                                                                          |
| Hart E MOA                        | 1 <sup>2</sup>                                                           | 0                                                                          |
| Hart F MOA                        | 1 <sup>2</sup>                                                           | 1                                                                          |
| Jarbridge South MOA               | 1                                                                        | 2                                                                          |
| Owyhee South MOA                  | 0                                                                        | 0                                                                          |
| Paradise South MOA                | 1                                                                        | 1                                                                          |
| <b>Oregon</b>                     |                                                                          |                                                                            |
| Dolphin North MOA                 | 129                                                                      | 6                                                                          |
| Dolphin South MOA                 | 29                                                                       | 0                                                                          |
| Juniper A & Juniper Low           | 0                                                                        | 0                                                                          |
| Juniper B & Juniper Low           | 0                                                                        | 0                                                                          |
| Juniper C & Juniper East Low      | 0                                                                        | 0                                                                          |
| Juniper D & East Low MOA          | 3                                                                        | 0                                                                          |
| Hart A MOA                        | 0                                                                        | 0                                                                          |
| Hart B MOA                        | 3                                                                        | 0                                                                          |
| Hart D MOA                        | 0                                                                        | 0                                                                          |
| Varmint ATCAA                     | 2                                                                        | 0                                                                          |

*Notes:* <sup>1</sup>Two of these sites are archaeological sites and the exact location is not available to the public; therefore, they may or may not be located under the military training airspace.

<sup>2</sup>The NRHP listed historic property is the same site (Applegate-Lassen Trail) which is located within the three MOAs.

*Legend:* MOA = Military Operations Area; NRHP = National Register of Historic Places.

*Sources:* NPS 2024c, 2024d; NoeHill 2024.

The 2017 *Oregon Airspace EIS* determined that no traditional cultural properties or resources were known to occur within or be affected by the Oregon military training airspace action (NGB 2017). No traditional cultural places or Native American sacred sites have been identified within the military training airspace portion of the APE through consultation conducted for the current undertaking.

The historic properties in California include 15 archaeological sites and a range of other resource types, including a shipwreck; a light station and lighthouse; the Gasquet Ranger Station Historic District; a schoolhouse; a Catholic church; a carpenter and paint shop associated with the Tule Lake Segregation Center; and Nevada–California–Oregon Railway resources (a depot and a general office building) (NPS 2024c, 2024d). Twelve California State Historic Landmarks occur beneath the military training airspace: Applegate–Lassen Trail, Battery Point Lighthouse, Battle of Land’s Ranch (1872), Brother Jonathan Cemetery, Camp Lincoln, Evans and Baily Fight, Fort Ter-Wer Site, Fremont’s Camp, Indian Village Site, Infernal Caverns Battleground, Pioneer Stage Road to Oregon, and S.S. Emidio (NoeHill 2024).

In Idaho, the three historic properties include the Wickahoney Post Office and Stage Station, Camp Three Forks, and the Camas and Pole Creeks Archaeological District (NPS 2024c, 2024d). Idaho does not have a State Register of Historic Places.

The three historic properties located in Nevada include Gold Creek Ranger Station, Silver State 13 Flour Mill, and the Applegate-Lassen Trail. The Applegate-Lassen Trail is located beneath three 14 military training airspace units (Hart B MOA, Hart E MOA, and Hart F MOA) (NPS 2024c, 2024d). Four Nevada State Historic Landmarks are located beneath the military training airspace. 16 These historic landmarks are titled: Camp McGarry, Town of Jarbidge, Jarbidge Community Hall, 17 and Fort McDermitt (NoeHill 2024).

The 166 historic properties in Oregon include 68 archaeological sites, 9 mines, 4 lighthouses, 17 houses, 6 ranger or coast guard stations, 5 hotels, 4 cemetery’s, 13 bridges, 6 ditches, 3 ranch/ranch complexes, 2 theatre’s, 2 historic districts, 2 banks, 1 library, 2 city hall’s, 2 churches, 1 cabin, 8 general buildings, the Siskiyou Smokejumper Base, a life boat station, a river light, an Elks Temple, a printing plant, Tribal Hall of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, a shipwreck, Cape Perpetua shelter and parapet, the Allen Gulch townsite, the Wheeler Ridge Japanese Bombing Site, and the Stone Bridge and the Oregon Central Military Wagon Road (NPS 2024c, 2024d). Six Oregon State Historic Landmarks are located beneath the Dolphin North MOA. These historic landmarks are titled: Empire City, Spruce Soldiers, Cape San Sebastian, Conflict of Pistol River, Gold Beach, and the location of the Japanese Attack on Oregon (NoeHill 2024).

### **3.9.2 Environmental Consequences**

Effects analysis for cultural resources focuses on assessing whether the Proposed Action or No Action Alternative have the potential to affect cultural resources that are eligible for listing in the NRHP (known as historic properties) including traditional cultural places or resources with traditional significance for Native American groups. Under Section 106 of the NHPA, the lead agency is responsible for determining whether any historic properties are located in the area; assessing whether the proposed undertaking would adversely affect the resources and notifying the SHPO or Tribal Historic Preservation Officer of any adverse effects.

An adverse effect is any action that may directly or indirectly change the characteristics that make the historic property eligible for listing in the NRHP. If an adverse effect is identified, the federal agency consults with the SHPO/Tribal Historic Preservation Officer, federally recognized Tribal Nations, and in some cases, the Advisory Council on Historic Preservation to develop measures to avoid, minimize, or mitigate the adverse effects of the undertaking.

Analysis of potential adverse effects on historic properties, including properties of traditional religious and cultural importance to an Indian tribe, is based on the following considerations: (1) physically altering, damaging, or destroying all or part of a resource; (2) altering characteristics of the surrounding environment that contribute to resource significance; (3) introducing visual, audible, or atmospheric elements that are out of character with the property or alter its setting; or (4) neglecting the resource to the extent that it deteriorates or is destroyed. The potential to directly disturb historic properties can be assessed by identifying the type and location of the Proposed Action. Effects that are farther removed from the immediate project area, including visual, audible (noise), or atmospheric changes due to project implementation may be harder to quantify.

Construction, renovation, and demolition activities associated with the Proposed Action have the potential to affect historic properties through both direct and indirect impacts. Ground-disturbing activities, including excavation, grading, trenching, and foundation work, may disturb or destroy previously identified or unidentified archaeological resources. Renovation and demolition of buildings, structures, or infrastructure may alter, damage, or remove character-defining features of historic properties, thereby diminishing their integrity and significance. In addition, construction activities may result in indirect effects, such as changes to the historic setting, visual character, feeling, or association of nearby historic properties. Aircraft operations are most likely to affect historic structures and districts where setting is an important criterion for significance and where noise could adversely affect those types of resources. The DAF conducted research for NRHP-listed, NRHP-eligible, and unevaluated architectural sites within the DNL 65 dB contour and greater at the airfield. While the cessation of regular 173 FW F-15C/D operations has temporarily reduced the ambient noise levels at historic properties within the APE, the Existing Conditions (2023) is used to represent the established acoustic setting for the purposes of Section 106 analysis. This analytical approach ensures that the effects of the Proposed Action are disclosed relative to the mission's documented long-term footprint, preventing a misleading 'quiet' reference point from skewing the evaluation of project-related impacts on the feeling and setting of historic properties.

Historic properties that would reasonably be affected by visual and noise intrusions, including properties of traditional religious and cultural importance to an Indian tribe, are evaluated for lands located beneath the existing military training airspace from surface level to the ceiling of each plus a 1-mile horizontal buffer.

Aircraft operations have the potential to affect historic structures and districts where setting is an important criterion for significance and where noise vibrations from sonic booms or low-level overflights could affect those types of resources. These resources are typically found in the NRHP or State Register.

In general, archaeological sites would not be expected to incur effects from aircraft noise or overflight activities associated with the Proposed Action. However, archaeological sites listed in the NRHP were included in the analysis, as some are standing structures and rock art sites.



Potential effects on these areas would be the same as potential effects on architectural sites from sonic boom overpressures.

Some Pre-contact archaeological sites could contain natural structures such as rock shelters or caves, and petroglyphs or pictographs, which are etched or painted onto the rock surfaces. However, studies have found that these types of natural formations are not affected by noise vibrations, such as sonic booms, any more than by natural erosion, wind, or seismic activity (Battis 1983).

Visual and noise intrusions could include low-level overflights, sonic booms, and distribution of chaff and flare residual materials. Historic properties potentially affected include significant historic sites such as National Historic Landmarks or properties listed in, or eligible for listing in, the NRHP that qualify because of setting or feeling, historic architectural resources or archaeological resources with standing structures (such as historic ranches or forts that could be affected by vibrations), national historic trails, and traditional cultural places that are associated with places that require isolation or quiet. Noise, including infrequent sonic booms and startle effects on traditional cultural resources, may be related to interference with ceremonies and other traditional activities at sacred sites. Undisturbed habitats, resources, and settings are considered to be critical to religious practices (NPS 1994).

Residual chaff and flare materials can land on the ground, structures, or sacred sites. The recent DAF Programmatic Environmental Assessment and historical studies confirm that these residues have low visibility, disperse widely, and do not significantly harm the aesthetic or visual integrity of cultural, architectural, and archaeological resources, including traditional cultural places (DAF 2023b; Government Accounting Office 1998). Any fibers that may land generally dissipate within a few days due to mechanical breakdown from wind, sediment erosion, and rain or snow. Chaff residual plastic materials are typically 1 inch by 1 inch. Flare residual plastic materials, usually red or blue in color, can be 1 inch by 2 inches or larger. Chaff and flares would not adversely affect cultural resources. The residual materials from chaff and flares fall to the ground in a dispersed fashion and do not collect in quantities great enough to adversely affect the integrity and subsequent NRHP status of archaeological or architectural resources.

Experimental data and models (Battis 1988; King 1985; King et al. 1988; Sutherland 1990) show that damage to architectural resources, including adobe buildings, is unlikely to be caused by subsonic noise and vibrations from aircraft overflights. Subsonic, noise-related vibration damage to structures requires high dB levels generated at close proximity to the structures and in a low frequency range (cf. Battis 1983, 1988; USFS 1992). Aircraft must generate an  $L_{max}$  of at least 120 dB to potentially result in structural damage (Battis 1988) and, even at 130 dB, structural damage is unlikely. Sutherland (1990) found that the probability of damage to a poorly constructed or poorly maintained wood frame building is less than 0.3 percent even when the building is directly under a large, high-speed aircraft flying only a few hundred feet AGL. Sonic booms can be associated with structural damage. Overpressure values are used to provide a general picture of pounds per square foot (psf) resulting from sonic booms associated with supersonic flight. Actual overpressure varies based on maneuvers (climb/descent, turns, acceleration/deceleration) and specific weather conditions (winds, vertical temperature/pressure profile). Most damage claims are for fragile or brittle objects, such as glass and plaster. There is a large degree of variability in damage experience, and much damage depends on the pre-existing condition of a structure.

Tests by the DAF on sonic booms have found that most structures in good condition are not affected by sonic booms with a peak overpressure of less than 16 psf. Tests by the National Aeronautics and Space Administration have shown that structures in good condition are undamaged by overpressures of up to 11 psf. Damage to plaster is in a comparable range of glass but depends on the condition of the plaster. Adobe faces risks similar to plaster, but assessment is complicated by adobe structures being exposed to weather, where they can deteriorate in the absence of any specific loads. In general, structural damage from sonic booms should be expected only for overpressures over 10 psf (Plotkin and Sutherland 1990).

Typical outdoor structures such as buildings, windmills, radio towers, etc., are resilient and routinely subject to wind loads far in excess of sonic boom pressures. Damage to plaster occurs at similar ranges to glass damage. Plaster has a compounding issue in that it will often crack due to shrinkage while curing, or from stresses as a structure settles, even in the absence of outside loads. Sonic boom damage to plaster often occurs when internal stresses are high from these factors. Some degree of damage to glass and plaster should thus be expected whenever there are sonic booms, but usually at a low rate.

#### 3.9.2.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented; therefore, no F-35A beddown, associated operational changes, or beddown-related infrastructure construction would occur at LMT/Kingsley Field ANGB. The No Action Alternative is retained as the analytical “not implementing the Proposed Action” scenario for comparison (see Section 3.1). Construction projects to support continued base operations, as identified in Tables 2.1-3 and 2.1-4 and Figures 2.1-1 and 2.1-2, would be implemented. This would include interior renovation of Buildings 130 and 302, and interior renovation of Buildings 220, 221, and 234 if alternate options are selected (see Table 2.1-3).

The No Action Alternative operational assumptions used for this analysis are described in Section 3.2 and the *Final Noise Study* (DAF 2026). Implementation of the No Action Alternative would not result in significant effects on cultural resources and no adverse effects per 36 CFR section 800.5(b) with respect to historic properties within the APE (including those within the DNL 65 dB and greater contour and beneath the military training airspace).

#### 3.9.2.2 Proposed Action Alternative

##### Installation

##### ***Archaeological Resources***

Implementation of the Proposed Action would result in approximately 933,050 SF of ground disturbance during construction activities. There are no NRHP-eligible or listed archaeological resources in the areas of non-impervious surfaces within the proposed construction footprints (including a 15-meter buffer). It is not expected that undiscovered archaeological resources would be found during implementation of the Proposed Action. However, in the event of an inadvertent discovery during ground-disturbing operations, the following specific actions would occur. The Project Manager would cease work immediately and the discovery would be reported to the Kingsley Field ANGB Environmental Manager. The Environmental Manager would secure the location and ensure that all cultural items are left in place and that no further disturbance is

permitted to occur. The Environmental Manager would continue to follow Standard Operating Procedure No. 6, Inadvertent Discovery of Cultural Materials, as outlined in the Kingsley Field ANGB ICRMP. Based on the results of the recent archaeological resources survey, the Proposed Action would not impact archaeological resources.

### ***Architectural Resources***

The Proposed Action would involve the interior modification of four buildings (Buildings 130, 216, 302, and 331). Interior modifications include demolition and reconstruction of interior walls; upgrading electrical systems; upgrading heating, ventilation, and air conditioning systems; and plumbing upgrades. An additional seven buildings involve interior modification under the alternate options (Buildings 209, 213, 220, 221, 234, 243, and 500). Implementation of the Proposed Action includes exterior renovations and/or additions for Buildings 332 and 333. Building 209 would undergo exterior additions if the alternate option is chosen. Twelve buildings would be demolished under the implementation of the Proposed Action (Table 2.1-3).

In consultation with the Oregon SHPO, the NGB identified the Kingsley Field Alert Hangar Historic District and determined that Buildings 219 (maintenance hangar), 325 (aircraft shelter), and 400 (alert hangar) are individually eligible for listing in the NRHP under Criteria A and C. The NGB determined that demolition of Building 219 would result in an Adverse Effect to Building 219 and the Kingsley Field Alert Hangar Historic District. To resolve this adverse effect pursuant to 36 CFR section 800.6, the DAF and the Oregon SHPO executed a Memorandum of Agreement. The agreed-upon mitigation measures are detailed in Section 3.9.3, and the executed agreement is provided in Appendix B.

### ***Traditional Cultural Places and Sacred Sites***

No known traditional cultural places or Native American sacred sites have been identified within the installation portion of the APE. Therefore, implementation of the Proposed Action would not affect known traditional cultural places or Native American sacred sites within the installation portion of the APE.

### ***Off-Installation***

Based on the projected noise contours for the aircraft operations under the Proposed Action, one historic building is located within the modeled DNL 75 to 80 dB contour (Summers School) (Oregon SHPO 2024b).

Under the Proposed Action, up to 24 PAA F-35A aircraft would be based at Kingsley Field ANGB, with the total number of sorties increasing by 2,215 relative to the No Action Alternative. Despite a slight increase in noise from aircraft operations under the Proposed Action, it would not be expected to affect the potential eligibility of the building, as noise from aircraft operations at LMT/Kingsley Field ANGB has been part of the setting of the airfield and surrounding area for decades. Therefore, there would be no adverse effect to the building per 36 CFR section 800.5(b).

### ***Military Training Airspace***

Under the Proposed Action, the F-35A would use a similar altitude profile as the F-15C/D in training; however, a greater proportion of F-35A training (61 percent) would occur above 20,000 feet MSL, compared to 45 percent for F-15C/D training under Existing Conditions (2023). The

use of low altitudes (between 500 feet AGL and 10,000 feet MSL) would slightly increase from 5 percent to 6 percent to satisfy specific low-level training requirements. Concurrently, overall training would place a much greater emphasis on survivability against surface-to-air threats, which drives increased use of high-altitude military training airspace and standoff distances.

Section 3.2.2.2 and the *Final Noise Study* (2026) describe the modeled increases in single-event and cumulative military training airspace noise under the Proposed Action. These modeled changes do not alter the cultural resources effects determination for historic properties within the APE beneath the military training airspace, including traditional cultural places. Supersonic operations for the F-35A would occur at or above 30,000 feet MSL, and although the frequency of supersonic events would increase, altitude and atmospheric conditions would reduce sonic boom effects at the ground. At these altitudes, sonic boom overpressures at the ground would be expected to remain low; therefore, supersonic operations would not be expected to result in damage to historic structures or adverse effects to historic properties. Based on modeled noise conditions and the altitude of supersonic operations, the Proposed Action would not result in significant effects on archaeological resources, historic structures, or traditional cultural places.

Visual intrusions would not result in significant effects on the settings of cultural resources. Due to the high altitude of overflights, small aircraft size at viewing distance, and high speeds, aircraft would not be readily visible to observers on the ground.

No ground disturbance would occur under the military training airspace and use of ordnance and defensive countermeasures would occur in areas already used for these activities. The Oregon ANG would continue to implement a minimum release altitude of 5,000 feet AGL for flares deployed in ANG-managed Oregon military training airspace (NGB 2017). The 173 FW would adhere to local operating procedures for chaff and flare release to include the Mountain Home military training airspace and restricted airspace associated with the Saylor Creek Range (DAF 2023a). Overall, flares are unlikely to adversely affect cultural resources; therefore, the introduction of material to archaeological sites or standing structures from flare use would not result in an adverse effect.

Historic properties are present within the APE under the military training airspace; however, they would not be adversely affected per 36 CFR section 800.5(b).

### ***Tribal and SHPO Consultation Efforts***

The NGB conducted government-to-government consultation with 44 federally recognized Tribal Nations holding traditional ties to lands at LMT/Kingsley Field ANGB and beneath the associated military training airspace. Initial outreach letters were sent in June 2024. The Modoc Nation accepted the invitation, raising concerns in August 2024 regarding wildfire risks from chaff and flare use, but identifying no specific cultural resource or sacred site concerns. In December 2024, the Confederated Tribes of the Grand Ronde Community, the Pit River Tribe, and the Coquille Indian Tribe formally declined further consultation, and outreach initiated with the Shoshone-Paiute Tribes of the Duck Valley Reservation (including follow-up in March 2025) received no response. Additionally, in 2025, NGB consulted with the Klamath Tribes during the permitting and work plan phase of the archaeological survey. Coincident with the public release of the Draft EIS, the NGB sent document distribution letters on March 12, 2026, and formal notification letters on April 10, 2026, to all 44 previously contacted Tribal Nations, inviting renewed consultation on

the draft findings. A specific follow-up consultation letter was also sent to the Modoc Nation on April 10, 2026. Following the April 2026 outreach, the Klamath Tribes concurred with the findings and determinations of the archaeological survey report. The Tribes also stated that they had no comments or concerns regarding potential adverse effects to Building 219 or the newly defined historic district at Kingsley Field.

No comments, requests for formal consultation, or concerns regarding cultural resources, traditional properties, or sacred sites were received from the Shoshone-Paiute Tribes, the Modoc Nation, or any other contacted Tribal Nation following the April 2026 outreach. Consequently, tribal consultation was completed for this undertaking. All consultation correspondence is preserved in Appendix B of this Final EIS.

The NGB conducted formal consultation with the SHPOs of California, Idaho, Nevada, and Oregon in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations under 36 CFR Part 800.

Because the undertaking in California, Idaho, and Nevada is limited entirely to the use of existing military training airspace, consultation for those states was completed with findings of no historic properties affected under 36 CFR section 800.4(d)(1). The Idaho SHPO concurred with this finding on March 14, 2025, followed by the California SHPO on April 24, 2025. The Nevada SHPO did not object within the 30-day regulatory review period, and formally confirmed in an April 3, 2026 email that the NGB had met its Section 106 requirements for Nevada.

Consultation with the Oregon SHPO was initiated in June 2024. On August 12, 2026, the Oregon SHPO concurred with the eligibility determinations for the Kingsley Field Alert Hangar Historic District and the finding of Adverse Effect for the demolition of Building 219 (36 CFR section 800.5(a)). For the airspace component, the SHPO concurred with the determination of no adverse effect. To resolve the adverse effect, the DAF and the Oregon SHPO executed a Memorandum of Agreement pursuant to 36 CFR section 800.6(c), which established the required mitigation measures. With the execution of the MOA, the Section 106 consultation process is complete. All consultation correspondence and the executed agreement are compiled in Appendix B.

### **3.9.3 Mitigation Measures**

The NGB and Oregon ANG will execute a Memorandum of Agreement with the Oregon SHPO pursuant to 36 CFR section 800.6 to resolve the Adverse Effect to Building 219 and the Kingsley Field Alert Hangar Historic District resulting from implementation of the Proposed Action. The Memorandum of Agreement will establish the required mitigation measures. The primary mitigation measure is the design, initiation, and publication of a comprehensive digital Story Map. This digital Story Map will be linked to at least the 173 FW and Oregon National Guard public websites, and its availability will be promoted across appropriate digital media platforms.

#### *Story Map Content Requirements*

The NGB and Oregon ANG will ensure the digital Story Map includes a comprehensive historical overview of the facility and its context within the installation.

- **Installation Mapping:** The Story Map will feature a current map of the installation, noting that certain buildings and their functions may be omitted from public maps due to security protocols.

- **Historical Context:** The digital presentation will detail the history of Building 219 as a maintenance hangar, focusing on its defense-related function, use, and significance as a military area.
- **Historic District Significance:** The narrative will discuss the specific significance of Building 219 to the Kingsley Field Alert Hangar Historic District.
- **Base Development:** The project will present Kingsley Field's development from World War II through the Cold War, highlighting the installation's association with the Air Defense Command's fighter interceptor and alert program.

#### Documentation and Archival Standards

The mitigation will require intensive historical documentation, exhaustive review of primary and secondary sources, and strict adherence to architectural and visual recordation standards.

- **Historical Narrative:** The historical documentation of Building 219 and its historic context will be comparable to the outline format used in Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey Guidelines for Historical Reports (2008, 2017). The Story Map will feature a dedicated Works Cited and Bibliography section.
- **Visual Recordation:** Images used in the production of the Story Map will include historic photographs, present-day views, and aerials (subject to licensing agreements) to document changes over time. Digital images taken for Building 219 will follow the Technical Requirements of the NRHP and National Historic Landmarks Program Consolidated and Updated Photograph Policy (2024).
- **Architectural Plans:** NGB will conduct a search for historic blueprints and plans for Building 219 at the base and the National Archives and Records Administration. If original blueprints are not located, NGB will consult with Oregon SHPO on the best alternative method to record the wood truss system utilized in Building 219.

#### **3.9.4 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified in the project area that are sufficiently certain to occur and sufficiently related in time, location, or nature to warrant consideration in the analysis of cultural resources. Accordingly, no effects from other future actions are included in the cultural resources analysis.

Apart from the effects of the Proposed Action analyzed above, cultural resources conditions in the area are expected to remain generally consistent with existing conditions. Existing military activities, including continued use of the existing military training airspace, would continue as part of ongoing operations. No changes to the existing military training airspace, airspace boundaries, or associated flight procedures have been identified as reasonably foreseeable that would result in additional effects on cultural resources.

No environmental trends have been identified that would reasonably be expected to substantially alter cultural resource conditions within the APE during the analysis period.

### **3.10 SAFETY**

#### **3.10.1 Affected Environment**

Safety addresses ground safety, explosive safety, and flight safety at LMT/Kingsley Field ANGB. Ground safety considers issues associated with emergency response including fire risk and management, RPZs, and antiterrorism/force protection (AT/FP). Explosive safety discusses the management and use of ordnance or munitions associated with base operations and training activities. Flight safety includes mishaps and hazards associated with aviation safety and Bird/Wildlife Aircraft Strike Hazard (BASH). The ROI for ground and aircraft safety effect analysis includes LMT, areas immediately adjacent to LMT, and the military training airspace utilized by aircraft based at LMT/Kingsley Field ANGB and the land beneath it. Although ground and flight safety are addressed independently, risks in the immediate vicinity of the runway are interrelated, and runway-area safety-of-flight considerations can affect ground safety (and vice versa).

##### **3.10.1.1 Ground Safety**

###### *Fire/Crash Response*

The 173 FW operates the Airport Rescue and Firefighting Facility and responds to all ANG and civilian-related fire and emergency incidents at the airport. The Airport Rescue and Firefighting Facility provides 24-hour emergency response for the ANG and the airport and has sufficient operating capacity for military and civilian traffic. There are no current formal agreements between the 173 FW and local emergency response entities. In the unlikely event of a civilian aircraft crash at LMT, the 173 FW would respond and provide support as requested by the City of Klamath Falls, FAA, or National Transportation Safety Board (City of Klamath Falls 2021).

Chaff and flare use is authorized in ANG-managed military training airspace in Oregon (DAF 2020a; NGB 2002, 2017). As described in Section 3.2.1.2, chaff and flare use is authorized in ANG-managed military training airspace in Oregon subject to an existing 5,000-foot AGL minimum release altitude established under the 2017 *Oregon Airspace EIS* ROD (NGB 2017). Flares are only used in approved military training airspace at designated altitudes, as wildfire risk is closely tied to release altitude. The use of chaff and flares would not increase under the Proposed Action.

###### *Runway Protection Zones*

LMT is owned and operated by the City of Klamath Falls and the 173 FW shares runway use with the airport. RPZs have been established at end of both runways. RPZs established at the eastern and western end of runway 08/26 and the southern end of Runway 14/32 occur both on and off of LMT property on lands zoned for agricultural land uses. The RPZ at the northern end of Runway 14/32 is also located primarily within the airport boundaries; however, the RPZ extends into areas outside of the airport that are zoned for commercial and industrial land uses.



### Explosive Safety

The 173 FW stores, maintains, and uses a small range of munitions required for executing their mission. QD arcs were established for these areas, including the munitions shop (Building 536) in the MSA, just east of Runway 14/32. Additional buildings in the MSA within the established QD arc include the munitions administration (Building 535), five storage buildings (Buildings 537–541), and three storage igloos (Buildings 4067–4069) (Oregon ANG 2023c).

The MSA QD arc occurs over a road on the airport which is required to be closed while munitions are being moved. Additionally, the QD arc extends into areas off LMT property; however, these areas are primarily zoned for agricultural land uses (City of Klamath Falls 2016). DAF has had a perpetual easement in place since July 26, 1956, as contained in Deed Volume 285, page 253 of Klamath County Records, that restricts the construction of structures adjacent to LMT within the QD arc.

### Antiterrorism/Force Protection

The majority of the 173 FW's infrastructure consists of legacy facilities that predate the establishment of current UFC for AT/FP. Due to the number of airport and general aviation users that have access to the airport and airfield, there are continuing AT/FP concerns relating to runway, taxiway, and apron security (City of Klamath Falls 2016). As new construction occurs and as facilities are modified, the DAF incorporates these standards to the maximum extent practical during project planning and design phases to ensure AT/FP compliance.

#### 3.10.1.2 Flight Safety and Airspace

##### Flight Safety Procedures

Aircraft flight operations conducted by the 173 FW are governed by standard flight rules set forth under Air Force Manual (AFMAN) 11-202 Volume 3 and the Kingsley Field Instruction 13-204. The 173 FW Operations Group Commander delegates a Supervisor of Flying during wing flying to ensure flight safety and to streamline communication between pilots, ATC, and commanders (173 FW 2021). The Supervisor of Flying is primarily concerned with the conduct of flight operations and not ATC functions.

##### Aircraft Mishaps

Safety conditions at LMT/Kingsley Field ANGB are characterized by established flight procedures, airfield operations, and historical mishap/accident data for military and civil aviation activity. The 173 FW experienced one nonfatal Class A mishap in 2023 involving a destroyed F-15 (DAF 2023c). At LMT, 14 nonfatal general aviation aircraft accidents have been recorded, with the most recent occurring on May 17, 2006 (National Transportation Safety Board 2024). Air Force Safety Center data indicate that the F-15 fleet (all variants) accumulated 7,114,603 flight hours from 1972 to 2023, with a lifetime average annual Class A mishap rate of 3.12 per 100,000 flight hours and a lifetime average destroyed aircraft rate of 2.44 per 100,000 flight hours (Air Force Safety Center 2024).

##### Bird/Wildlife Airstrike Hazards

BASH and the hazards they present form another safety concern for aircraft operations. BASH constitutes a safety concern because of the potential for injury to aircrews or local populations

and/or damage to aircraft. The 173 FW actively implements the *173 FW Bird-Aircraft Strike Hazard Plan 91-212*, thereby reducing the potential for a bird strike to occur. Key elements of the plan include monitoring the airfield for bird and other wildlife activity, issuing bird hazard warnings, initiating bird/wildlife avoidance procedures when potentially hazardous bird/wildlife activities are reported, and submitting BASH reports for all incidents (Oregon ANG 2020a).

Over a 15-year period (2005–2019), the 173 FW reported 96 strikes resulting in damage totals of \$348,545. Two wildlife strike peaks occur with one period appearing in March and April, and the other between September and October. The most common species struck by aircraft include small perching birds (Oregon ANG 2020a).

#### Mid-Air Collision Avoidance

The 173 FW utilizes various military training airspace as described in Section 2.1.2.2. Flight operations are conducted in accordance with FAA and DAF regulations. To minimize the potential for a mid-air collision, Kingsley Field ANGB is mandated by DAF Instruction (DAFI) 91-202 to ensure all flying units establish, document, and maintain a Mid-air Collision Avoidance (MACA) program (DAF 2020b).

### **3.10.2 Environmental Consequences**

#### **3.10.2.1 No Action Alternative**

Under the No Action Alternative, the 173 FW would not implement the Proposed Action. 173 FW airfield operations are projected to decrease relative to Existing Conditions (2023), consistent with the No Action Alternative assumptions described in Section 3.2 and the *Final Noise Study* (DAF 2026). As aircraft availability declined and maintenance demands for legacy airframes increased, this scenario also predicted a potential rise in maintenance-related cancellations, in-flight emergencies, and training constraints for the F-15C/D aircraft. Overall, the safety effects of the No Action Alternative are defined by the modeled reduction in F-15C/D flying activity and do not reflect current-day operations.

#### **3.10.2.2 Proposed Action Alternative**

##### Fire/Crash Response Safety

The 173 FW fire department would continue to respond to all ANG-related fire and emergency incidents, and response demand is not expected to increase in frequency under the Proposed Action. Any increase in incident response due to construction-related activities would be temporary and within the current capacity of the 173 FW fire department. Some proposed projects would improve fire protection systems, resulting in beneficial effects on fire safety. Therefore, no significant effects on fire/crash safety would be expected from the Proposed Action.

The existing minimum release altitude of 5,000 feet AGL for flare use in ANG-managed Oregon military training airspace, as described in Section 3.10.1.1, would remain in effect under the Proposed Action. The 173 FW would continue to adhere to applicable local operating procedures for chaff and flare release in the Mountain Home military training airspace and restricted airspace associated with the Saylor Creek Range (DAF 2023a). No changes to chaff and flare use are proposed that would alter fire/crash response requirements under the Proposed Action.

### Runway Protection Zones

There would be no construction or renovation projects that would occur within the designated RPZs under the Proposed Action. RPZ dimensions are aircraft-specific; the replacement F-35A would not require changes to RPZ layouts at LMT. Therefore, no significant effects would be expected from the Proposed Action.

### Explosive Safety

Under the Proposed Action, the F-35A would introduce air-to-ground munitions, a capability not available with the F-15C/D fighter mission analyzed in Existing Conditions (2023). However, no live air-to-ground munitions would be assembled, stored, or loaded at Kingsley Field ANGB. Inert munitions would continue to be used for munitions assembly and loading training. The F-35A's air-to-ground training would primarily involve simulated training modes, with air-to-ground ordnance not physically loaded or released from the aircraft. Some live ordnance training would occur at other facilities, such as Mountain Home AFB, which is better equipped for live ordnance events.

Although four construction projects (Projects 10a, 10b, 11, and 12) are proposed within the footprint of the existing MSA QD arc, these projects would not result in the storage of live munitions at Kingsley Field ANGB. The QD arc would be modified or established as needed to accommodate the proposed facilities and meet DAF safety requirements; however, no increase in live munitions storage is proposed. No significant effects related to explosive safety are anticipated, and the overall extent of the QD arc would remain consistent with Existing Conditions (2023).

### Antiterrorism/Force Protection

Under the Proposed Action, proposed construction would be designed and implemented to meet applicable fire protection and AT/FP requirements and standards. Therefore, there would be a beneficial effect on AT/FP compliance.

### Flight Safety Procedures

Under the Proposed Action, 173 FW airfield operations are evaluated at approximately 20,780 annual operations, which represents an increase relative to both Existing Conditions (2023) and the No Action Alternative, consistent with the operational assumptions described in Section 3.2 and the *Final Noise Study* (DAF 2026). Assuming civil, ADAIR, and transient operations remain unchanged, total airfield operations at LMT would also increase under the Proposed Action (DAF 2026). Flight procedures for the 173 FW would remain unchanged and would continue to follow the standard flight rules set forth in AFMAN 11-202, Volume 3, and 173 Kingsley Field Instruction 13-204, and all aircraft would operate in compliance with FAA regulations and local flight rules. With continued adherence to established safety procedures, no adverse effects on flight safety are expected under the Proposed Action.

### Aircraft Mishaps

Air Force Safety Center mishap data provides context for evaluating aircraft mishap risk under the Proposed Action. Across all F-35 models, the aircraft has flown 225,449 hours in DAF inventory from 2000 to 2021, during which five Class A mishaps and one destroyed aircraft were reported, resulting in a lifetime average annual Class A mishap rate of 0.23 per 100,000 flight hours and a

lifetime average destroyed aircraft rate of 0.44 per 100,000 flight hours (Air Force Safety Center 2022). In comparison, the F-15 fleet (all variants) accumulated 7,114,603 flight hours from 1972 to 2023, with a lifetime average annual Class A mishap rate of 3.12 per 100,000 flight hours and a lifetime average destroyed aircraft rate of 2.44 per 100,000 flight hours (Air Force Safety Center 2024). Although these fleet-wide data indicate a lower mishap rate per flight hour for the F-35 than for the F-15, the Proposed Action would increase 173 FW flight operations relative to the No Action Alternative; therefore, overall mishap exposure would increase with the greater number of operations and accumulated flight hours over time.

The Proposed Action would maintain the same safety procedures in place under Existing Conditions (2023). The increase in 173 FW operations associated with F-35A beddown (approximately 7,340 additional annual operations relative to Existing Conditions [2023]) would increase opportunities for incidents; however, the F-35A's advanced avionics, automation, and safety systems are expected to reduce mishap potential on a per-flight-hour basis. With continued adherence to established safety procedures, no significant adverse effects on aircraft mishap risk are expected under the Proposed Action.

#### *Bird/Wildlife Airstrike Hazards*

Under the Proposed Action, the F-35A would operate in the same military training airspace environment as the F-15C/D aircraft. Most of the F-35A training would occur above heights of 20,000 feet. However, the overall potential for BASH would not be anticipated to be statistically different following the beddown of the F-35A. The 173 FW BASH program would remain in effect under the Proposed Action, and the rate of BASH incidents would not be expected to increase.

#### *Mid-Air Collision Avoidance*

Under the Proposed Action, the F-35A would operate under the same ATC procedures and local flight rules applicable to operations at LMT. Established ATC procedures and enforcement of the MACA program reduce the possibilities of a MACA event. Additionally, Class D airspace is controlled airspace where ATC is in communication with every pilot operating within the confines of the controlled airspace. ATC is governed under the FAA Order 7110.65, *Air Traffic Control*. Paragraph 2-1-2 states ATC's duty priority gives first priority to separating aircraft and issuing safety alerts (FAA 2025b). Therefore, no increased risk of mid-air collisions would be expected as a result of implementation of the Proposed Action.

### **3.10.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified in the project area that are sufficiently certain to occur and sufficiently related in time, location, or nature to warrant consideration in the analysis of safety effects. Safety conditions under the Proposed Action and No Action Alternative are evaluated based on the existing safety environment and the changes in aircraft operations and supporting activities associated with each alternative. The analysis considers established fire/crash response capabilities, runway protection zones, explosive safety requirements, AT/FP requirements, flight safety procedures, aircraft mishap risk, BASH, and MACA procedures, as applicable. No environmental trend has been identified that would independently alter these safety conditions or the conclusions of the alternatives analysis.

### **3.11 HAZARDOUS MATERIALS/WASTE**

#### **3.11.1 Affected Environment**

49 CFR section 171.8 defines hazardous materials as hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, materials designated as hazardous in the Hazardous Materials Table (49 CFR section 172.101), and materials that meet the defining criteria for hazard classes and divisions in 49 CFR part 173. Hazardous wastes are defined by the Resource Conservation and Recovery Act at 42 USC section 6903(5), as amended by the Hazardous and Solid Waste Amendments, as “a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (A) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed, or otherwise managed.”

Petroleum products include crude oil or any derivative thereof. The ROI for hazardous materials and wastes includes Kingsley Field ANGB, where hazardous materials are used, stored, and potentially generated during operations. This ROI encompasses areas impacted by base activities, including the airfield and any associated infrastructure, as well as surrounding land areas where hazardous materials and waste could be transported or affect environmental quality. The ROI does not include areas under military training airspace, as no ground disturbance or construction activities would occur in those regions.

##### **3.11.1.1 Hazardous Materials**

Hazardous materials and petroleum products are used at Kingsley Field ANGB for many functions, including fueling operations; vehicle, airplane, and helicopter maintenance; and training operations. Types of hazardous materials found at Kingsley Field ANGB include batteries; petroleum, oils, and lubricants (POLs); paints; thinners; sealants; solvents; pesticides; and fuels (i.e., Jet-A, diesel fuel, motor gasoline). Prior to on-site distribution and use, hazardous materials are stored at the base-wide Hazardous Materials Pharmacy (Building 226) (Oregon ANG 2006a). ASTs and other containers are used for bulk fluid storage (i.e., 55-gallon drums) on the base including Jet-A, gasoline, diesel fuel, lubricating oil, hydraulic fluid, used oils, transformer dielectric fluid, and hazardous waste (petroleum products), fire-fighting agents (aqueous film-forming foam [AFFF] and high-expansion foam), deicing fluid, antifreeze, liquid oxygen, boiler chemicals, and detergents. Individual storage tanks/containers equal to or greater than 55 gallons and their location, contents, capacity, tank materials, and installation date are described in detail in the 173 FW *Final Spill Prevention, Control, and Countermeasure Plan* updated November 2023 (Oregon ANG 2023d). The 173 FW *Final Spill Prevention, Control, and Countermeasure Plan* also contains the governing regulations for spill prevention and describes specific protocols for preventing and responding to releases, accidents, and spills involving oils and hazardous materials (Oregon ANG 2023d).

##### **3.11.1.2 Hazardous Waste Management**

The *Hazardous Waste Management Plan* updated in September 2014 (Oregon ANG 2014) outlines procedures for controlling and managing hazardous wastes from the point of generation until final

disposal. It also includes guidance for compliance with all federal, state, and local regulations pertaining to hazardous waste. Waste minimization and pollution prevention programs are in place at Kingsley Field ANGB and are managed by the Environmental Management Office. In addition, the Environmental Management Office coordinates with the Hazardous Materials Pharmacy to evaluate hazardous substance use by maintenance activities at the 173 FW. As a result of these efforts, the 173 FW has reduced or eliminated the use of toxic or hazardous substances and the generation of hazardous wastes wherever possible through source reduction and environmentally sound recycling (Oregon ANG 2014).

The 173 FW is regulated as a small quantity generator of hazardous waste and maintains EPA Identification Number OR3572800040. A Satellite Accumulation Point (SAP) is an area where hazardous waste is initially accumulated at the point of generation and there are 23 SAPs on the base. Hazardous wastes initially accumulated at a SAP are stored in appropriate containers before being transferred to the base Central Accumulation Point (CAP). As a small quantity generator, the 173 FW is allowed to accumulate hazardous waste in containers for a period up to 180 days, or 270 days if the receiving treatment, storage, and disposal facility(ies) is/are at a distance greater than 200 miles. There is one CAP for hazardous waste at the base (Oregon ANG 2014).

The 173 FW does not maintain any petroleum underground storage tanks (USTs) regulated under 40 CFR part 280 on the base. There are USTs used as wastewater holding tanks and oil/water separators (OWSs) (for more details, see Section 3.11.1.2) (Oregon ANG 2023d).

Kingsley Field ANGB uses OWSs to remove oils and greases from industrial wastewater prior to discharge. All OWSs discharge to the sanitary sewer collection system. Stormwater drains at the POL Storage Area discharge to OWSs and then to the stormwater system (Oregon ANG 2023d). There are 10 identified OWSs on Kingsley Field ANGB. The OWSs range in capacity from 500 to 5,000 gallons (Oregon ANG 2023d).

#### 3.11.1.3 Toxic Substances

Regulated toxic substances typically associated with buildings and facilities include asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). The most recent Environmental Baseline Survey (Oregon ANG 2006a), reports that a 1992 asbestos survey at Kingsley Field ANGB verified the presence of ACM in 35 buildings, including 13 that would potentially be affected by construction (Buildings 130, 208, 219, 220, 221, 229, 231, 234, 242, 302, 331, 400, and 500). Much of the ACM was discovered to be non-friable and/or could be maintained in place. In 2006, another asbestos survey was conducted and the presence of ACM was identified in 26 buildings, including the same 13 listed above (Oregon ANG 2006b). The general recommendation included in the 2006 Asbestos Management Plan was that if the ACM was found “...to be in good condition and does not pose a threat, no immediate action is required...Removal must be considered if the areas are ever included in a repair or construction project.” DAFI 32-1001, *Civil Engineer Operations, Chapter 16 Facility Asbestos Management*, assigns responsibilities and establishes requirements to incorporate facility asbestos management principles and practices and DAFMAN 32-7002, *Environmental Compliance and Pollution Prevention*, specifically addresses asbestos-contaminated and LBP-contaminated construction and demolition debris management. Asbestos-contaminated construction and demolition debris must be treated as asbestos-containing waste, labeled as required by 29 CFR section 1926.1101(k), and

disposed of under 40 CFR section 61.50, *Standard for Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying Operations*, and applicable state or local requirements.

A LBP survey has not been conducted at Kingsley Field ANGB. Due to the age of buildings at the base, the potential for LBP hazards exists. However, there are no permanent housing units or habitable structures that would require disclosure of LBP, and no potential LBP hazards were identified during the 2006 Environmental Baseline Survey site visit. In addition, buildings are tested for LBP prior to demolition or renovation (Oregon ANG 2006a). If LBP is identified in a building to be demolished or renovated, DAFMAN 32-7002 would be followed.

A PCB survey was conducted at Kingsley Field ANGB in 1998. Since that time, all sources containing 50 parts per million or more have been removed, and no evidence of leakage or other causes of concern were noted (Oregon ANG 2006a).

#### 3.11.1.4 Contaminated Sites

##### Defense Environmental Restoration Program

The DoW conducts environmental restoration activities in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund. In 1986, through adoption of the Superfund Amendments and Reauthorization Act, Congress established the Defense Environmental Restoration Program (DERP) that provides for the environmental restoration of sites under the jurisdiction of the Secretary of Defense. The DAF and ANG conduct their DERP activities under their Environmental Restoration Program (ERP).

A total of 14 sites have been identified under the DAF's ERP at Kingsley Field ANGB. Six of the sites (Sites 2, 3, 4, 7, 8, and 12) are the responsibility of the U.S. Army Corps of Engineers (USACE) because these sites are located on non-federal property but were formerly used by the DAF. These sites are now referred to as Formerly Used Defense (FUD) sites, which are similar in nature and comprise virtually identical remediation challenges, but they are managed separately and are not the responsibility of the ANG. The remaining eight sites (Sites 1, 5, 6, 9, 10, 11, 13, and 14) are the responsibility of the ANG (Oregon ANG 2006a).

In 2017, a Contaminated Media Management Plan was developed for the eight ERP sites as required by the Oregon DEQ to provide guidelines and instructions on actions for any subsurface work at the base where contamination is likely to be encountered. In addition, the plan included two more contaminated sites (the Floor Drain Discharge to Ditch at the Vehicle Maintenance Building [DD018] and the Former Wash Rack Discharge to Ditch [RW004] identified by Building 573) and the two FUD cleanup sites (Sites 2 and 4) as they appeared to be located within the current base boundaries (Oregon ANG 2017).

Additionally, there is one Munitions Response Area that is a former skeet range and shotgun firing platform. Munitions debris was not observed; however, clay pigeon debris was present indicating the site was used and that the soil has not been significantly reworked or disturbed in these areas. Contaminants of concern, lead, and polycyclic aromatic hydrocarbons may have been present. This site was granted No Further Action status by Oregon DEQ in 2013 (Oregon DEQ 2013). Table 3.11-1 provides details for the ERP sites and Figure 3.11-1 shows the location of the sites.

**Table 3.11-1 Environmental Restoration Program Sites at Kingsley Field ANGB**

| <b>ERP Site ID</b> | <b>Site Name and Location</b>  | <b>Materials of Concern</b>                                                                                                                                                                                                                                                                                                                                                            | <b>Status</b>                                                                                       | <b>Land Use Controls</b>                                                                                                                                               |
|--------------------|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                  | Base Landfill 1 (MSA)          | Arsenic was found to be the only COC exceeding the Oregon DEQ risk-based concentrations for residential receptors which was considered not to be applicable for the base.                                                                                                                                                                                                              | Closed, NFA – 8 August 2007                                                                         | None. No unacceptable risk identified to either human or ecological receptors.                                                                                         |
| 2                  | Base Landfill 2 (FUD Site 2)   | The results of the RI/FS indicated that no COCs were identified in soil, and that arsenic, benzene, and 1,2-dichloroethane were the only COCs identified in groundwater.                                                                                                                                                                                                               | Responsibility of USACE. The final ROD recommended no action as the preferred remedial alternative. | No unacceptable risks were identified for human receptors from contaminants in groundwater, and no ecologically important species or habitat were present.             |
| 4                  | Coal Ash Disposal (FUD Site 4) | The results of the RI/FS indicated no COCs were identified in soil or groundwater.                                                                                                                                                                                                                                                                                                     | Responsibility of USACE. The final ROD recommended that NFA was necessary.                          | No COCs discovered.                                                                                                                                                    |
| 5                  | Coal Ash Disposal              | Low levels of TPH, PAHs, and arsenic were detected in soil. GRO and arsenic were detected in groundwater.                                                                                                                                                                                                                                                                              | Closed, NFA – 8 August 2007                                                                         | No unacceptable risk identified to either human or ecological receptors. LUCs governing future use as a military and airport facility preclude future residential use. |
| 6                  | Wood Ash Disposal              | Petroleum-impacted soils encountered in this area during construction were attributed to accidental releases that occurred near the vehicle maintenance facility. Metals and PAHs were detected in soil. Lead, VOCs, and PAHs were detected in groundwater. These contaminants were below DEQ RBCs or published background concentrations (metals only) for both soil and groundwater. | Closed, NFA – 4 January 2008                                                                        | None. No unacceptable risk identified to either human or ecological receptors.                                                                                         |
| 9                  | Engine Test Cell Facility      | Jet fuel and engine oil were stored at the site. DRO, PAHs, and VOCs were detected in soil at 6 to 7 feet bgs. Benzene, toluene, xylenes, and naphthalene were detected in groundwater at concentrations that were lower than the applicable DEQ RBCs.                                                                                                                                 | Closed, NFA – 4 January 2008                                                                        | None. No unacceptable risk identified to either human or ecological receptors.                                                                                         |



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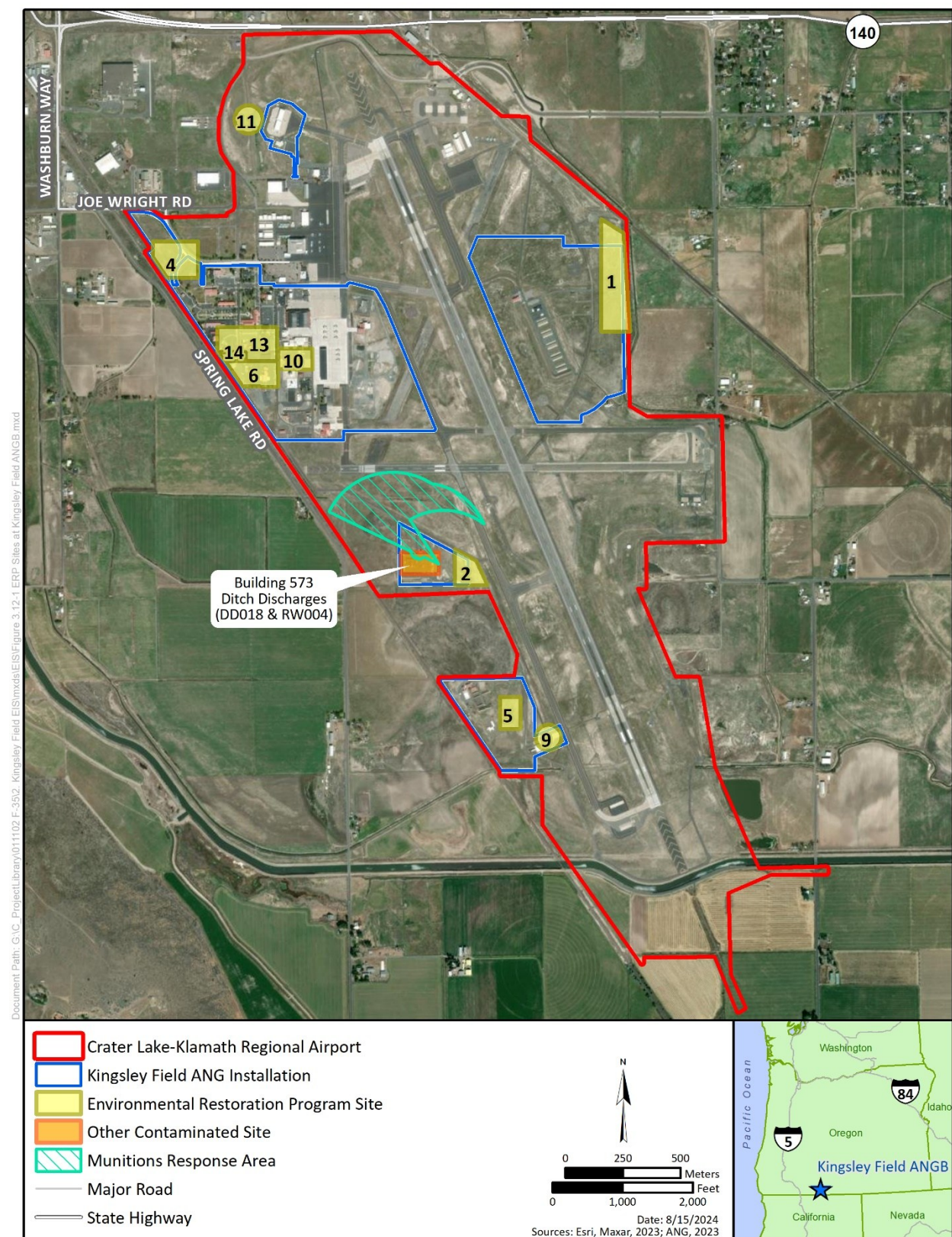
| <b><i>ERP<br/>Site ID</i></b> | <b><i>Site Name and<br/>Location</i></b>              | <b><i>Materials of Concern</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b><i>Status</i></b>                                                                                                                                                                                                                                                                                                                                                                             | <b><i>Land Use Controls</i></b>                                                                                                                                                                                                                                                 |
|-------------------------------|-------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10                            | Fuel Loading Facility (Renamed IRP Site 16 or PL016)  | Site PL016 is used as a jet fuel storage and distribution facility. Four leaking USTs (removed in 1994 and 1995) resulted in petroleum-contaminated soil and groundwater. Remedial actions were completed at this site and a determination of NFA was requested in 1997. However, the site remained open and was reevaluated for possible pockets of contamination. BTEX and GRO were detected in soil and groundwater. Benzene and ethylbenzene concentrations in soil exceeded the indoor vapor intrusion RBC, but buildings are not located in this area and are not reasonably likely to be constructed here in the future. | Closed, NFA with restrictions – 4 August 2014. Any future intrusive work performed at the site must be performed in accordance with the July 2014 Contaminated Media Management Plan and with Oregon DEQ regulations and policies.                                                                                                                                                               | The LUCs/ICs include restrictions on groundwater use (other than for monitoring), confirmation that no residential construction has occurred at the site, and a land transfer notification to notify potential future property owners that closure was to industrial standards. |
| 11                            | Diesel Oil Spill Site (Renamed IRP Site SS011)        | In 1977, as much as 10,000 gallons of diesel was released from a ruptured underground fuel line. During 2001 and 2002, Oxygen Release Compound (ORC®) was injected near one monitoring well located northwest of Building 400. Remaining VOCs and DROs in soil and groundwater were below the applicable RBCs and ecological screening levels.                                                                                                                                                                                                                                                                                  | Closed, NFA with restrictions (no residential use) – 8 August 2007. In March 2014, a Final ROD that selected a NFA remedy was signed and approved by the Oregon DEQ. NFA recommendation was based on the determination that contaminants at the site do not pose an unacceptable threat to human health or the environment and is based on the assumption of continued non-residential land use. | LUCs/ICs include restrictions on groundwater use (other than for monitoring), confirmation that no residential construction has occurred at the site, and a land transfer notification to notify potential future property owners that closure was to industrial standards      |
| 13                            | Petroleum Release Site (Renamed IRP Site 15 or TU015) | Petroleum-impacted soil and groundwater within five possible AOCs were discovered at TU015 associated with floor drains, a UST, and an OWS. In October 2012, the area was treated with a chemical oxidant (EHC-O™) to remediate groundwater. The chemicals of concern in groundwater included BTEXN and GRO. Although not documented in the NFA Decision Document, these same compounds may be present in soil. After the chemical oxidant injection in 2012, benzene and naphthalene in groundwater did not exceed the occupational ingestion RBCs.                                                                            | Closed, NFA with restrictions – 6 September 2013. The NFA recommendation was based on the presumption of continued industrial land use.                                                                                                                                                                                                                                                          | The LUCs/ICs include restrictions on groundwater use (other than for monitoring) and a land transfer notification to notify potential future property owners that closure was to industrial standards.                                                                          |

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| <b>ERP Site ID</b> | <b>Site Name and Location</b>                                                        | <b>Materials of Concern</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Status</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Land Use Controls</b>                                                                                                                                                                                           |
|--------------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 14                 | Underground Fuel Leak at Heating Plant (Building 300) (Renamed IRP Site 14 or SS014) | Approximately 3,500 cubic yards of diesel-impacted soil was removed in 1993. A pocket of soil contamination of approximately 466 cubic yards was left in-place beneath utility lines near the excavation. Benzene concentrations exceeded Oregon DEQ residential drinking water RBCs in groundwater in one monitoring well in Site 14. However, Oregon DEQ concluded that the pocket of contamination did not pose an unacceptable risk to human health and the environment, and the petroleum-impacted soil cleanup was completed according to the UST Soil Matrix Level 2 cleanup levels (Oregon Administrative Rules 304-122-320). | An NFA with restrictions concurrence letter was signed by the Oregon DEQ on 25 March 1996. In March 2014, a Final ROD that selected a NFA remedy for the site was signed and approved by the Oregon DEQ. NFA recommendation was based on the assumption of continued non-residential land use, that the area of remaining residual soil contamination remains inaccessible, and the notification of future purchasers of the property of the remaining pocket of contamination. | The LUCs/ICs include confirmation that no residential construction has occurred at the site, and a land transfer notification to notify potential future property owners that closure was to industrial standards. |
| 19                 | 140-Gallon Gasoline UST at Building 570 (now 571) (IRP Site 19 or TU019)             | UST was removed and olfactory evidence of contaminated soil was reported in the excavation. A dark-stained area of apparently contaminated soil was observed below the former location of the vent pipe. The presence of TPH-DRO was detected in the soil samples.                                                                                                                                                                                                                                                                                                                                                                    | Closed, NFA with restrictions – 19 March 2014. The NFA recommendation was based on the presumption of continued industrial land use.                                                                                                                                                                                                                                                                                                                                            | The LUCs/ICs include confirmation that no residential construction has occurred at the site, and a land transfer notification to notify potential future property owners that closure was to industrial standards. |
|                    | Newly Identified Contamination at Building 573 (DD018 and RW004)                     | These two sites are for discharges from the floor drain at the vehicle maintenance building (DD018) and from the former wash rack (RW004) that drained to a ditch near Building 573. A 2017 RI/FS Report indicates that soils in the ditch are affected by PAHs.                                                                                                                                                                                                                                                                                                                                                                      | Investigated in 2017.                                                                                                                                                                                                                                                                                                                                                                                                                                                           | LUCs might be forthcoming following investigation.                                                                                                                                                                 |

*Legend:* ANG = Air National Guard; AOC = area of concern; bgs = below ground surface; BTEX = Benzene, toluene, ethylbenzene, and total xylenes; BTEXN = benzene, toluene, ethylbenzene, total xylenes, and naphthalene; COC = contaminants of concern; DAF = Department of the Air Force; DEQ = Department of Environmental Quality; DRO = Diesel Range Organics; ERP = Environmental Restoration Program; FUD = Formerly Used Defense; GRO = Gasoline Range Organics; IC = Institutional Control; ID = Identification; IRP = Installation Restoration Program; LUC = Land Use Control; MSA = Munitions Storage Area; NFA = No Further Action; OWS = Oil/Water Separator; PAH = polycyclic aromatic hydrocarbons; POL = petroleum, oil, and lubricant; RBC = risk-based concentration; RI/FS = Remedial Investigation & Feasibility Study; ROD = Record of Decision; TPH = Total Petroleum Hydrocarbon; U.S. = United States; USACE = United States Army Corps of Engineers; UST = underground storage tank; VOC = volatile organic compound.

*Sources:* Oregon ANG 2006a, 2016, 2017, 2020b; Oregon DEQ 2022.



**Figure 3.11-1 ERP Sites at Kingsley Field ANGB**

### *Per- and Poly-Fluoroalkyl Substances*

#### ***Aqueous Film Forming Foam***

AFFF is a fire-fighting agent used commercially and by the DoW, including the DAF and ANG. Kingsley Field ANGB personnel reported that AFFF was replaced with Fluorine-Free Foam in September 2024 (Forney, personal communication, 2024).

#### ***Oregon PFAS Standards, Regulations, and/or Guidance***

Oregon DEQ has designated per- and polyfluoroalkyl substances (PFAS) as one of 60 priority chemicals or chemical classes for its Toxics Reduction Strategy. In addition, Oregon DEQ is working with the Oregon Health Authority and other federal, state, and local agency partners to address growing public health and environmental concerns. Oregon DEQ and Oregon Health Authority are evaluating appropriate policy responses to protect public health and the environment from PFAS impacts (Oregon DEQ 2024c). Oregon has 2 years to adopt the EPA’s final drinking water regulation released on April 10, 2024 (Oregon Health Authority 2024).

In response to perfluorooctanesulfonic acid (PFOS)/perfluorooctanoic acid (PFOA) and other emerging contaminants, the Air Force Civil Engineer Center, responsible for environmental management and response across the DAF, established a program to systematically identify potential releases, address drinking water contamination, and prevent future impacts. Eight potential Areas of Concern or Potential Release Locations (PRLs) related to PFOS/PFOA impacts from AFFF were identified at Kingsley Field ANGB during a preliminary assessment in September 2015. In 2018, a Phase III regional site inspection (SI) was conducted at these eight PRLs to determine if PFOS/PFOA-contaminated groundwater had reached the ANG-leased property; provide a defensible No Further Action decision for qualifying PRLs; and develop data quality objectives for additional investigation of PRLs not meeting No Further Action criteria or requiring interim response actions, if appropriate (NGB 2018). All eight sites were recommended for further investigation to characterize potential PFOS/PFOA impacts (NGB 2018). Since PFOS/PFOA are also present in a wide variety of other materials, the ANG determined a supplemental assessment of non-AFFF-related PFOS/PFOA sources was necessary.

In 2022, a Supplemental Preliminary Assessment was conducted to identify potential Areas of Interest (AOIs), potentially responsible parties, and to develop recommendations for further investigation (Oregon ANG 2022). (Note: the AOIs were previously referred to as PRLs in past documents. For continuity of reference, the Supplemental Preliminary Assessment has retained the PRL numbering for AOIs 1 through 8). This assessment also expanded the geographic scope to include the former Kingsley Field AFB footprint. Ten new AOIs were identified: five (AOI 9, AOI 13, AOI 14, AOI 15, and AOI 16) are within the current Kingsley Field ANGB boundary, and five (AOI 10, AOI 11, AOI 12, AOI 17, and AOI 18) within the current LMT boundary (Oregon ANG 2022). Of these, six sites (AOI 9, AOI 10, AOI 12, AOI 13, AOI 14, and AOI 15) are included in the site investigation, while the remaining four AOIs showed no evidence of a PFAS-containing constituent release from past military use and were excluded (Oregon ANG 2023e).

Table 3.11-2 provides details on the AOIs and recommendations from the 2022 Supplemental Preliminary Assessment, and Figure 3.11-2 shows their locations.



**Table 3.11-2 AOIs of PFOS/PFOA at Kingsley Field ANGB**

| <b>AOI ID</b> | <b>Site Name and Location</b>                          | <b>Potential PFOS/PFOA Sources</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Recommendations</b>                                                                                        |
|---------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| 1             | Hangar 333                                             | In 2007, approximately 200 gallons of AFFF plus associated water were released from Hangar 333's fire suppression system (total volume unknown) inside and outside of the hangar.<br>Two nearby buildings (Building 332 and Building 334) included in AOI 1 are locations of potential PFOS/PFOA source materials. In 2018, soil sample analysis confirmed the presence of PFOS/PFOA in all surface soil samples collected in the Hangar 333 area and in three of six subsurface samples collected    | PFOS/PFOA have been confirmed within the AOI. Additional sampling during the Supplemental SI is not required. |
| 2             | Fire Department Testing Area (FETA)-North <sup>1</sup> | From approximately 1995 to 2005, AFFF testing from three fire trucks from the Oregon ANG fire rescue unit would reportedly occur every Monday at one of the three locations: the North FETA, the South FETA, or the Compass Rose FETA. Typically, the fire department utilized 3 percent AFFF. The estimated amount of AFFF released weekly was 3 to 4 gallons per testing event; exact discharge quantities are unknown. The North FETA is a flat, grass- and dirt-covered area (see Figure 3.11-2). | PFOS/PFOA have been confirmed within the AOI. Additional sampling during the Supplemental SI is not required. |
| 3             | FETA-South <sup>1</sup>                                | See description in FETA-North.<br>The South FETA is a flat, grass- and dirt-covered area (see Figure 3.11-2).                                                                                                                                                                                                                                                                                                                                                                                         | PFOS/PFOA have been confirmed within the AOI. Additional sampling during the Supplemental SI is not required. |
| 4             | FETA-Compass Rose <sup>1</sup>                         | See description in FETA-North.<br>The Compass Rose FETA is a flat, grass- and dirt-covered area (see Figure 3.11-2). Of the three FETAs, the Compass Rose FETA site was the most heavily used.                                                                                                                                                                                                                                                                                                        | PFOS/PFOA have been confirmed within the AOI. Additional sampling during the Supplemental SI is not required. |
| 5             | Building 573, Former Vehicle Maintenance Building      | Small discharges of AFFF mixture from maintenance on fire trucks have occurred at this building                                                                                                                                                                                                                                                                                                                                                                                                       | PFOS/PFOA have been confirmed within the AOI. Additional sampling during the Supplemental SI is not required. |
| 6             | Building 216, Current and Former Fire Station-         | This new fire station was built in 1995. Monthly AFFF testing of one fire truck is performed in the grassy area north of Building 216, in the location of the former Building 216.                                                                                                                                                                                                                                                                                                                    | PFOS/PFOA have been confirmed within the AOI. Additional sampling during the Supplemental SI is not required. |
| 7             | North Outfall <sup>1</sup>                             | The North Outfall may have received any potential releases of AFFF that would have entered the drainage ditches and canals located to the east and west of the base (see Figure 3.11-2). It was determined that none of the AOIs except FETA-North (AOI 2) (located outside of the ANG-leased property) would likely contribute surface water runoff to the North Outfall.                                                                                                                            | PFOS/PFOA have been confirmed within the AOI. Additional sampling during the Supplemental SI is not required. |

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| <b>AOI ID</b> | <b>Site Name and Location</b>                                 | <b>Potential PFOS/PFOA Sources</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Recommendations</b>                                                                                                                                                                                                                                                                                      |
|---------------|---------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8             | South Outfall <sup>1</sup>                                    | The South Outfall may have received any potential releases of AFFF that entered the drainage ditches and canals to the east and west of the base (see Figure 3.11-2). Documented use and storage of AFFF within the drainage basin (including AOIs 1, 3, 4, 5, and 6), could have discharged into the South Outfall.                                                                                                                                                                                                                                                                                                   | PFOS/PFOA have been confirmed within the AOI. Additional sampling during the Supplemental SI is not required.                                                                                                                                                                                               |
| 9             | Former Sewage Treatment Plant <sup>2</sup>                    | From about 1945 to 1995, the Former Sewage Treatment Plant treated sanitary and process wastewater from Kingsley Field, the CLKR Airport, and a nearby residential subdivision, all of which are potential PFOS/PFOA sources to the wastewater entering the plant. Sludge drying beds were located north of the plant and discharged wastewater to groundwater, and treated water was released into the adjoining Lost River Diversion Channel.                                                                                                                                                                        | Sample potential release locations, such as the sludge drying beds, the treated water outfall, and around pipes or pump stations, where a preferential groundwater pathway may exist. Sample surface and vadose zone soils, and groundwater at presumed upgradient and downgradient hydrological locations. |
| 10            | Landfill 3/Crop Duster Area <sup>1,2</sup>                    | Interpretation of recent aerial photos suggests a white material was released into a catch basin and an area where dead vegetation is present adjoining the paved apron. AOI 10 includes Landfill 3 and the Crop Duster Area (see Figure 3.11-2). Maintenance wastes, pesticides, and demolition debris were reportedly placed in Landfill 3 from 1957 to 1985. Additionally, the Crop Duster Area is a likely location for releases of pesticides and herbicides during aircraft wash down and mixing, loading, or unloading of spray formulations.                                                                   | Collect samples from these areas and in the vicinity of agricultural chemicals mixing and dispensing activities or spills, Sample surface and vadose zone soils, groundwater at presumed up- and downgradient hydrological locations, and catch basin sediment.                                             |
| 11            | Former Dumpsite <sup>1,2</sup>                                | AOI 11 includes a former dumpsite and a former Boresight Range (see Figure 3.11-2) <sup>3</sup> . The dumpsite was used for an undetermined period to dispose of construction debris, electronic equipment, and general refuse, but .50-caliber ammunition may have been disposed in this area. The former Boresight Range identified at the north end of AOI 11 has the potential for small arms munitions residue in the affected area and firing platform (Shaw 2010, as cited in Oregon ANG 2022).                                                                                                                 | Evidence of specific ANG or USAF PFOS/PFOA releases to the environment was not found.                                                                                                                                                                                                                       |
| 12            | Former Fire Training and Crop Duster Wash Down <sup>1,2</sup> | Two fire training areas and a crop duster washdown area were formerly located at AOI 12 (see Figure 3.11-2) <sup>4</sup> . Fire training areas are likely release sites for AFFF, and crop duster washdown areas likely to contain residue from herbicides and pesticides, which may contain PFOS/PFOA. These uses reportedly ended by the early 1990s <sup>5</sup> . AOI 12 has been redeveloped with general aviation hangars, aircraft and vehicle parking, and the USFS air tanker base. Hangars may contain AFFF fire suppression systems, and the Class A foam used at the airtanker base may contain PFOS/PFOA. | Sample surface and vadose zone soils. Sample groundwater at presumed up-and downgradient hydrological locations.                                                                                                                                                                                            |

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| <b><i>AOI ID</i></b> | <b><i>Site Name and Location</i></b>                     | <b><i>Potential PFOS/PFOA Sources</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b><i>Recommendations</i></b>                                                                                                                                                                                                                                                                                     |
|----------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 13                   | South Base <sup>2</sup>                                  | The “hush house” engine test cell facility includes storage and use of engine oil and has had minor POL releases recorded (see Figure 3.11-2). It adjoins former Landfill 5, and the current Kingsley Field ANGB rifle range. Munitions, landfills, and aircraft maintenance are all potential sources of PFOS/PFOA.                                                                                                                                                                                                                                  | Sample surface and vadose zone soils.<br>Sample groundwater at presumed up-and downgradient hydrological locations.                                                                                                                                                                                               |
| 14                   | Kingsley Field Aircraft Maintenance Hangars <sup>2</sup> | The Kingsley Field Aircraft Maintenance Hangars area includes two locations with aircraft maintenance activities (Buildings 219 and 213) and a wash rack (Building 237). Building 219, constructed in 1959, is used for aircraft maintenance and includes an AFFF-based fire suppression system. In 2006, the fire suppression system was noted as needing repair <sup>6</sup>                                                                                                                                                                        | Sample surface and vadose zone soils.<br>Sample groundwater at presumed up-and downgradient hydrological locations.<br>Sample sediment from floor drains or catch basins, if present.                                                                                                                             |
| 15                   | POL Release Area <sup>2</sup>                            | Petroleum contamination from multiple UST, AST, and dispensing location releases have been found in the POL Area. Remediation has occurred and groundwater monitoring is ongoing within the POL Area.                                                                                                                                                                                                                                                                                                                                                 | Sample surface and vadose zone soils.<br>Sample groundwater to determine whether PFOS/PFOA were components of the POL releases. Sample sediment from floor drains or catch basins, if present.                                                                                                                    |
| 16                   | Alert Hangar <sup>2</sup>                                | Aircraft maintenance reportedly occurred on a sporadic basis at the Alert Hangar. No investigation for the presence of PFOS/PFOA has been performed.                                                                                                                                                                                                                                                                                                                                                                                                  | Evidence of specific ANG or USAF PFOS/PFOA releases to the environment was not found.                                                                                                                                                                                                                             |
| 17                   | Runways <sup>1,2</sup>                                   | AOI 17 comprises the active Runways 7-25 and 14-32. Four safety incidents listed in NTSB databases <sup>7</sup> were identified at CLKR Airport and could potentially have warranted a fire response or precautionary measure. All of these incidents have the potential for PFOS/PFOA to have been released onto the runways and/or surrounding soils and stormwater catch basins. In addition to potential PFOS/PFOA releases from these landing accidents, pavement and asphalt sealers have the potential to have been formulated with PFOS/PFOA. | Evidence of specific ANG or USAF PFOS/PFOA releases to the environment was not found.                                                                                                                                                                                                                             |
| 18                   | CLKR Airport Hangar Area <sup>1,2</sup>                  | AOI 18 includes the Airport Hanger Area, which encompasses large hangars which likely have AFFF fire suppression systems installed. The presence and maintenance of fire suppression systems can result in incidental releases of PFOS/PFOA-containing AFFF.                                                                                                                                                                                                                                                                                          | Evidence of specific ANG or USAF PFOS/PFOA releases to the environment was not found.                                                                                                                                                                                                                             |
| General              |                                                          | PFOS/PFOA impacts near Installation Boundary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Collect additional surface and subsurface soil samples to determine the nature and extent of impacts.<br>Collect additional groundwater samples on-base and off in upgradient location to quantify potential effects from upgradient sources to determine if PFOS/PFOA effects beyond the ANG-leased property are |

***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field Air National Guard Base, Klamath Falls, Oregon  
Final – September 2026***

| <b><i>AOI ID</i></b> | <b><i>Site Name and Location</i></b> | <b><i>Potential PFOS/PFOA Sources</i></b> | <b><i>Recommendations</i></b>                                                                                                                                                                                                                                              |
|----------------------|--------------------------------------|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |                                      |                                           | increasing or decreasing.<br>Collect additional surface water and sediment samples both on-base and off in upgradient location to quantify potential effects from upgradient sources, to define the nature and extent of PFOS/PFOA impacts beyond the ANG-leased property. |

*Notes:* <sup>1</sup>Sites are located at non-ANG areas.

<sup>2</sup>Identified in the 2022 Final Supplemental Preliminary Assessment.

<sup>3</sup>Shaw 2010, as cited in Oregon ANG 2022

<sup>4</sup>CH2M HILL 1981, as cited in Oregon ANG 2022

<sup>5</sup>USACE 1994, as cited in Oregon ANG 2022

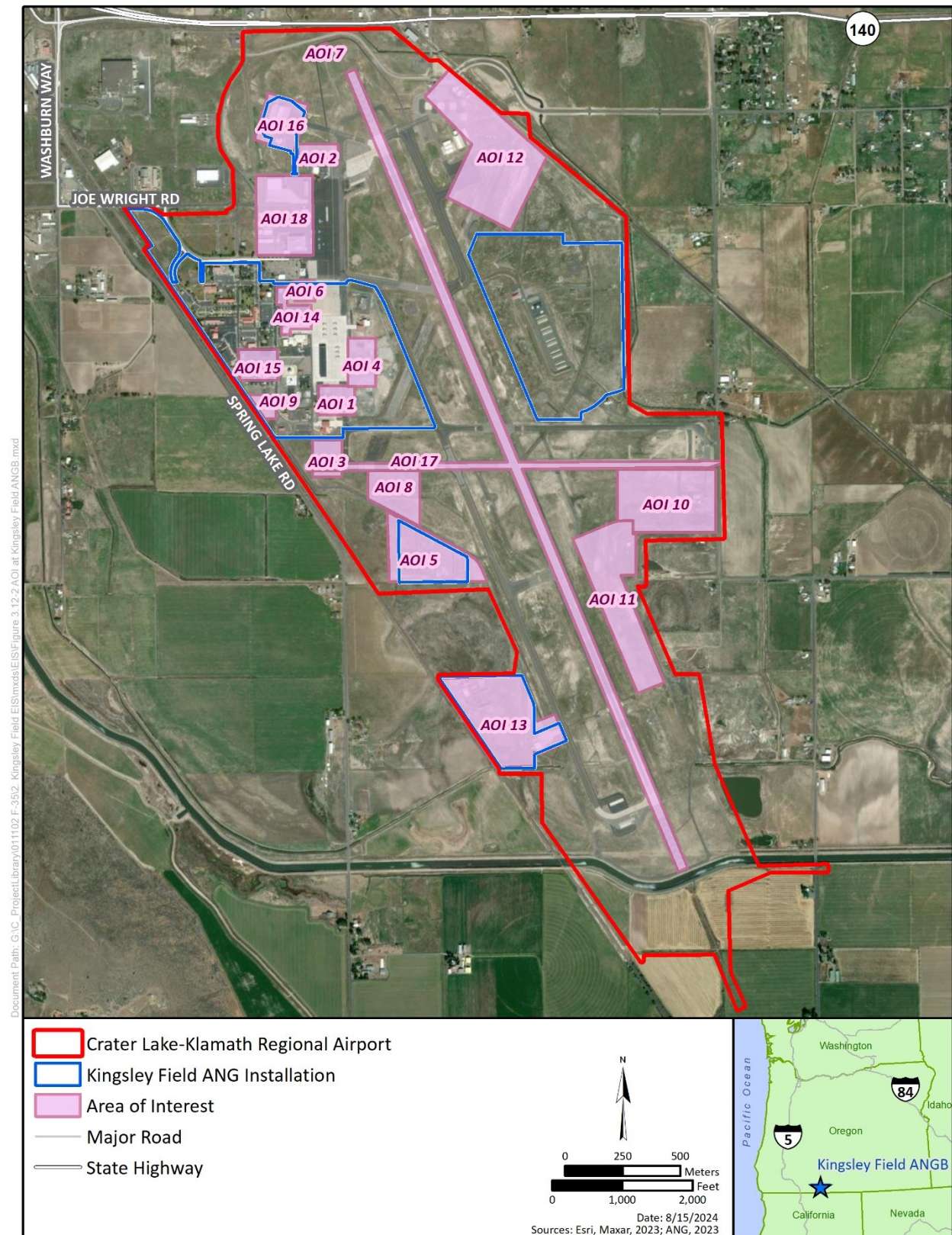
<sup>6</sup>USAF 2006, as cited in Oregon ANG 2022

<sup>7</sup>NTSB 2020a, 2020b, as cited in Oregon ANG 2022

*Legend:* AFFF = aqueous film-forming foam; ANG = Air National Guard; ANGB = Air National Guard Base; AOI = Area of Interest; AST = aboveground storage tank; FETA = Fire Department Testing Area; FUDS = Formerly Used Defense Site; LMT = Crater Lake-Klamath Regional Airport; NTSB = National Transportation Safety Board; PFOA = Perfluorooctanoic acid; PFOS = Perfluorooctane sulfonate; POL = petroleum, oil, and lubricant; PRL = Potential Release Location; SF = square foot/feet; USACE = United States Army Corps of Engineers; USAF = United States Air Force; USFS = United States Air Force; UST = underground storage tank.

*Source:* Oregon ANG 2018, 2022.





**Figure 3.11-2 AOIs of PFOS/PFOA at Kingsley Field ANGB**

### **3.11.2 Environmental Consequences**

A comparative analysis of existing and proposed hazardous materials and waste management practices was performed to evaluate effects. The analyses included effects due to proposed construction activities as well as the proposed operational activities for the F-35A. The analysis considered the magnitude of anticipated increases in hazardous waste generation considering historic levels, existing management practices, and storage capacity. For ERP or AOI sites, the methodology compares the proximity of the proposed construction actions to the contaminated sites and considers construction activities and operational uses of the facilities to determine the effects on the ERP or AOI sites.

#### **3.11.2.1 No Action Alternative**

Under the No Action Alternative, the Proposed Action would not be implemented, and no F-35A beddown, associated operational changes, or beddown-related infrastructure construction would occur at LMT/Kingsley Field ANGB. Hazardous materials management, waste generation, or disposal changes would continue based on established practices. Although regular F-15C/D operations have ceased and associated hazardous materials activities have been reduced, the No Action Alternative retains the Existing Conditions (2023), which includes operational data, hazardous material management, and waste handling as they existed before the divestment of the F-15C/D fleet. Hazardous material and waste projections for the No Action Alternative are based on the 2023 modeling data and represent a consistent comparison, not current-day operations.

With a decrease in airfield and military training airspace operations, hazardous materials use and waste generation would be expected to decrease in line with reduced operations. Several proposed construction projects under the No Action Alternative involve buildings containing ACM (Projects 20a, 21b, 21c, 21d, and 22a). Additionally, some projects overlap with ERP Sites 4, 6, and 13 and AOIs 12, 14, and 15. See Tables 3.11-1 and 3.11-2 for the status of ERP sites and AOIs. Contaminated areas would be managed following the same protocols described for the Proposed Action Alternative.

Therefore, no significant effects on hazardous materials and waste would occur under the No Action Alternative.

#### **3.11.2.2 Proposed Action Alternative**

##### *Hazardous Materials*

Short-term effects would be anticipated due to construction activities associated with the Proposed Action. Construction activities would produce minor increases in handling, storage, use, and transportation of hazardous materials. The temporary increase in hazardous materials on site during construction activities would be managed under the base's *Hazardous Waste Management Plan* (Oregon ANG 2014). Additional aircraft, vehicles, and equipment would increase consumption of operating fluids and fuel; however, the long-term effects would not be significant. No work would be performed on the ASTs and no additional ASTs are proposed to be installed. Possible effects associated with these projects include tank ruptures or leaks during construction from the construction vehicles, equipment, and/or hazardous materials stored on-site. The 173 FW

has in place a *Final Spill Prevention, Control, and Countermeasure Plan* which would address these effects should they occur (Oregon ANG 2023d).

The types of hazardous materials needed for maintenance and operation of the F-35A would be similar to those used for maintenance and operation of the F-15C/D fleet with the one notable exception of the touch-up paint used for the low-observable coating on the F-35A. The F-35A low-observable coatings require climate-controlled storage and have a short shelf life (i.e., 90 days from date of manufacture). Containers stored locally are sized to minimize waste. Larger scale painting on the F-35A would be conducted at one of the F-35 depot locations. Under the Proposed Action, the total number of airfield operations would increase; therefore, throughput of petroleum substances and hazardous material streams would be expected to increase commensurately.

#### *Hazardous Waste*

Implementing the Proposed Action would have short-term effects on hazardous waste accumulation, primarily due to an increase in construction-related hazardous wastes. All construction-related hazardous waste would be managed by contractors in compliance with applicable federal and state regulations. The volume of hazardous waste generated during the operation and maintenance of the F-35A would be similar to that of the F-15C/D fleet. Waste would be tracked, analyzed, and classified to determine whether it is hazardous. All waste would be properly disposed of according to federal, state, and local requirements, with no trash or other solid waste being buried, burned, or otherwise disposed of at the project site. Any hazardous or deleterious materials storage, disposal, or accumulation near state waters must comply with Oregon Water Quality Standards (EPA 2022). Implementation of the Proposed Action is not expected to result in adverse long-term environmental effects. Hazardous waste generation would continue to be managed in accordance with the base's Hazardous Waste Management Plan and all applicable regulations. Additionally, no changes to the base's small quantity generator status are expected. Although the total number of airfield operations would increase under the Proposed Action, the F-35A's lower unscheduled maintenance needs compared to the F-15C/D would likely offset the minor increase in hazardous waste generation over time.

#### *Toxic Substances*

Toxic substances typically associated with buildings and facilities include ACM, LBP, and/or PCBs. No new toxic substances would be used or stored due to the Proposed Action. There are 13 buildings (Buildings 130, 219, 220, 221, 229, 230, 231, 234, 242, 243, 302, 331, and 500) that were identified with ACM and also involve the proposed projects under the Proposed Action.

Additionally, ACM was previously identified in Buildings 208 and 220 but has since been removed. Under the 2006 Asbestos Management Plan, removal of any remaining ACM must be considered if affected areas are included in a repair or construction project (Oregon ANG 2006b). If ACM is discovered in a building proposed for demolition or renovation, applicable state and federal requirements would be followed, including 40 CFR section 61.145, *Standard for Demolition and Renovation*, and 29 CFR section 1926.1101, *Asbestos Construction Standard*. DAFMAN 32-7002, *Environmental Compliance and Pollution Prevention*, addresses the management of asbestos- and LBP-contaminated construction and demolition debris, including requirements for planning, exposure, recordkeeping, transportation, and disposal. Asbestos-contaminated construction and demolition debris must be treated as asbestos-containing waste, labeled as required by 29 CFR section 1926.1101(k), and disposed of under 40 CFR section 61.50,

*Standard for Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying Operations*, and applicable state or local requirements.

An LBP survey has not been conducted at Kingsley Field ANGB. Based on the age of several buildings at the base, there is a high likelihood that LBP was used at the facility (Oregon ANG 2006a). Buildings constructed prior to 1978 that are included in Proposed Action projects would be tested for LBP before demolition or renovation. As a BMP, contractors renovating or demolishing buildings that test positive for LBP would be EPA-certified and use lead-safe work practices. LBP would be managed and disposed of in compliance with Toxic Substances Control Act, Occupational Safety and Health Administration regulations, Oregon requirements, and established ANG and DAF procedures. Implementation of these requirements and BMPs during construction would minimize potential effects associated with toxic substances; no significant effects are anticipated.

#### Contaminated Sites

The DoW uses the ERP to identify, characterize, clean up, and restore sites contaminated with hazardous substances, low-level radioactive materials, petroleum products, or other pollutants and contaminants. As part of the overall program to identify effects from historical operations, the DAF is also investigating potential effects related to chemicals known as PFAS. This family of chemicals was developed in the 1940s and includes PFOS, which was used in stain- and water-resistant products, and PFOA, which was used for protective coatings.

Five ERP sites (Site 4, Site 6, Site 10, Site 13, and Site 14) overlap with or are adjacent to some of the proposed construction, renovation, and/or demolition projects under the Proposed Action (Figure 3.11-3). All five ERP sites are closed with a determination of No Further Action; however, Sites 10, 13, and 14 have Land Use Controls/Institutional Controls in place (see Table 3.11-1). These controls would be considered prior to initiating any proposed projects.

Seven PFOS/PFOA AOIs (AOI 1, AOI 4, AOI 6, AOI 9, AOI 12, AOI 14, and AOI 15) overlap with 20 Proposed Action Alternative projects (Projects 2b, 4a-4c, 5a-5b, 7, 9a-9d, 13b-13d, 14, 16, 17, 20a-20b, and 23) (Figure 3.11-4). See Table 3.11-2 above for the status of the AOIs.

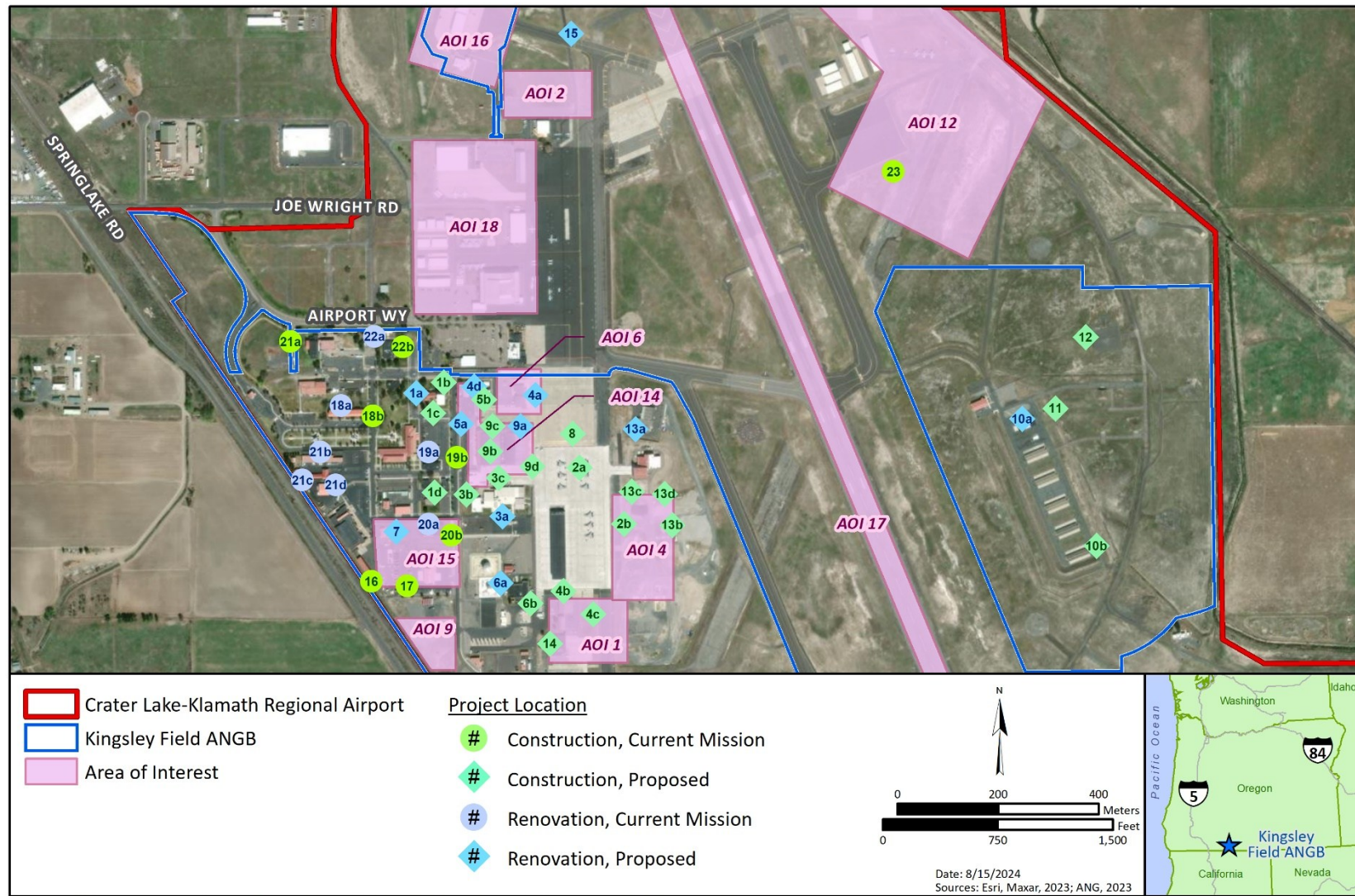
PFAS investigations at Kingsley Field ANGB are in progress and ongoing. Kingsley Field ANGB would manage PFAS-impacted materials (e.g., soils and dewatering effluent) in accordance with DoW policies and EPA guidelines during construction activities. Prior to construction, investigations would assess the potential for PFAS impacts, and if impacted materials are encountered, a Contaminated Media Management Plan would ensure proper handling, sampling, and disposal in compliance with federal, state, and local regulations.

The Contaminated Media Management Plan, stormwater pollution prevention requirements, erosion and sediment control requirements, and applicable permits or approvals would include construction-phase procedures to reduce the potential for contaminated soil, sediment, groundwater, dewatering effluent, or other media to enter stormwater systems or downstream drainage infrastructure.









**Figure 3.11-4 AOIs within the Vicinity of the Proposed Construction at Kingsley Field ANGB**

Dewatering activities that occur during construction would be tested for PFAS impacts. If the water exceeds threshold impacts levels, it would be treated using a treatment train that may include Granular Activated Carbon, PFAS-tailored sorbents, ion-exchange resin, or foam fractionation. Any residual treated materials would be properly disposed of in accordance with DoW policies at a treatment media regeneration facility, a municipal solid waste facility, or a hazardous waste incinerator with environmental permits that meet specific temperature requirements.

If construction dewatering is required, the discharge or disposal method would be determined during final design or construction planning and would be managed in accordance with applicable federal, state, local, and DAF requirements. Any discharge of treated dewatering water to surface waters or stormwater conveyances would be conducted in accordance with applicable Oregon DEQ permitting or approval requirements. If discharge to a stormwater conveyance or drainage system that could enter Klamath Irrigation District-managed facilities is proposed, the DAF would coordinate, as appropriate, with Klamath Irrigation District and applicable regulatory agencies prior to discharge.

Should unforeseen PFAS impacts be discovered during construction, work would cease until the ERP Manager coordinates with relevant regulatory agencies to determine next steps. Contractors and personnel would follow Occupational Safety and Health Administration standards, ensuring proper worker safety during handling and disposal. These BMPs would ensure PFAS-impacted materials are managed responsibly, minimizing environmental and human health risks.

In April 2024, the EPA designated PFOS and PFOA as hazardous substances under CERCLA. This designation will affect the management requirements for excavated material (i.e., soil and groundwater) generated during construction. The volume of waste generated would be tracked and analyzed to determine whether each type of waste is hazardous. The DoW management of PFAS is evolving and a recent Office of the Secretary of Defense decision affected management requirements. On February 20, 2026, the Assistant Secretary of Defense for Energy, Installations, and Environment, issued a memo “Updated Interim Guidance on Destruction or Disposal of Materials Containing Per- and Polyfluoroalkyl Substances in the United States” that provides guidance to DoW installations regarding how to dispose of PFAS-containing materials (Assistant Secretary of Defense for Energy, Installations, and Environment 2026).

If contaminated media (e.g., soil, vapor, groundwater) was encountered during the course of site preparation (e.g., clearing, grading) or site development (e.g., excavation for installation of building footers) for proposed construction activities, work would cease until the 173 FW Environmental Manager establishes an appropriate course of action for the construction project to ensure that any applicable federal and state agency notification requirements are met, and to arrange for agency consultation as necessary if closed ERP sites are affected. By following these procedures, effects on ERP Sites 4, 6, 10, 13, and 14, and AOI Sites 1, 4, 6, 9, 12, 14, and 15 would not be significant.

The construction contractors would be responsible for ensuring their workers follow appropriate health and safety requirements including ensuring the field staff are Occupational Safety and Health Administration Hazardous Waste Operations and Emergency Response trained, if required. Therefore, no significant effects on hazardous materials, hazardous waste, toxic substances, or contaminated sites would occur.

### **3.11.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that would result in additional effects on hazardous materials and waste. Management of hazardous materials, hazardous waste, toxic substances, and contaminated media at LMT/Kingsley Field ANGB would continue as part of ongoing installation operations under both the Proposed Action and the No Action Alternative. Existing management procedures, pollution prevention and waste minimization practices, and environmental restoration requirements would also continue to apply.

PFAS investigations at Kingsley Field ANGB are ongoing, and requirements governing PFAS management continue to evolve. In April 2024, the EPA finalized the designation of PFOS and PFOA as hazardous substances under CERCLA. On February 20, 2026, the Assistant Secretary of Defense for Energy, Installations, and Environment issued *Updated Interim Guidance on Destruction or Disposal of Materials Containing Per- and Polyfluoroalkyl Substances in the United States*, which provides current DoW guidance for disposal of PFAS-containing materials (Assistant Secretary of Defense for Energy, Installations, and Environment 2026). These requirements may affect the characterization, management, treatment, transportation, and disposal of PFAS-impacted materials encountered during installation activities. These regulatory trends would not alter the conclusions regarding hazardous materials and waste effects under the Proposed Action or the No Action Alternative.

## **3.12 BIOLOGICAL RESOURCES/WETLANDS**

### **3.12.1 Affected Environment**

Biological resources include plant and animal species and the habitats within which they occur. Plant associations are referred to generally as vegetation, and animal species are referred to generally as wildlife. Habitat can be defined as the resources and conditions present in an area that support a plant or animal.

Although the existence and preservation of biological resources are intrinsically valuable, these resources also provide aesthetic, recreational, and socioeconomic values to society. This analysis focuses on species or vegetation types that are important to the functions of ecosystems, are of special societal importance, or are protected under federal or state law or statute. For purposes of this analysis, these resources are divided into four major categories: vegetation, wildlife, special status species, and wetlands.

The ROI for biological resources primarily consists of LMT/Kingsley Field ANGB, with additional information presented for the surrounding vicinity, where relevant. The ROI also includes areas under the military training airspace used by the 173 FW. Due to the nature of the actions proposed within the military training airspace, coastal resources and plant species were excluded from extensive review and analysis because the proposed activities would not result in new ground disturbance, and ordnance delivery and chaff and flare use would not exceed current levels and would occur in locations already used and authorized for those purposes. In addition, marine species, invertebrates, and fish were also excluded from review and analysis under the military training airspace as they would not likely be affected by the changes to the use of the military training airspace under the Proposed Action.



#### 3.12.1.1 Vegetation

Vegetation at LMT/Kingsley Field ANGB is characterized predominantly by grassed and landscaped areas, with little native vegetation. Drainage ditches at LMT/Kingsley Field ANGB support aquatic and wetland vegetation, such as cattails (*Typha* spp.) and rushes (*Juncus* spp.). Adjacent to runways and taxiways are typically mowed grasslands, composed of a mix of native and non-native species and include species such as shadscale saltbush (*Atriplex confertifolia*), saltgrass (*Distichlis spicata*), and squirrel's tail (*Hordeum jubatum*) (NGB 2023). Two invasive plant species, perennial pepperweed (*Lepidium latifolium*) and Medusahead (*Taeniatherum caput-medusae*), were identified in 2022 (173 FW 2024a). The most dominant non-native species on the base include intermediate wheatgrass (*Elytrigia intermedia*) and bulbous bluegrass (*Poa bulbosa*) (NGB 2024d). Annual non-native grassland areas occur in smaller patches throughout the developed portions of the base and dominant species include cheatgrass (*Bromus tectorum*) and foxtail barley (*Hordeum murinum*) (NGB 2024d).

#### 3.12.1.2 Wildlife

Wildlife habitat within the base is limited due to the small amount of natural vegetation, fragmentation, and disturbed nature of the surrounding area. In addition, the high level of activity, noise, and the surrounding airport also contribute to diminishing the quality of the local habitats to support wildlife. A total of 16 common bird species and 15 common mammal species were recorded during a comprehensive biological survey completed at Kingsley Field ANGB in 2021–2022 (NGB 2023). More details regarding these species can be found in the Kingsley Field Integrated Natural Resources Management Plan (NGB 2024d).

The military training airspace associated with 173 FW operations spans portions of Oregon, Nevada, Idaho, and California. Wildlife within these areas occur across multiple ecoregions—including the Coast Range, East Cascades Slopes and Foothills, Klamath Mountains, California High North Coast Range, and Northern Basin and Range (Griffith 2010)—which provide habitat for a diverse range of species.

Existing biological resource protection measures apply to military training activities within this airspace. Formally adopted in the 2017 *Oregon Airspace EIS* ROD (NGB 2017), existing measures for bald and golden eagles include seasonal buffer areas extending from the surface to 1,000 feet AGL within 0.25 mile of mapped nests; flight operations do not occur within these buffers from January 1 through August 15. Additional measures include annual coordination with the U.S. Fish and Wildlife Service (USFWS), Oregon Department of Fish and Wildlife (ODFW), and the Oregon Eagle Foundation to obtain current nesting data and adjust buffers; coordination of military flight schedules with eagle survey biologists; and procedures to deconflict biological survey flights within the Juniper Low and Juniper East Low MOAs.

Additionally, the greater sage-grouse (*Centrocercus urophasianus*) occurs in sagebrush steppe underneath the airspace. While not federally or state-listed, it is considered sensitive in Oregon (ODFW 2021) and is managed under state and federal conservation plans (ODFW 2011). Because of these targeted protective programs, it is analyzed separately from general wildlife. An existing protection measure adopted in the same 2017 ROD requires the Oregon ANG to avoid low-level flights over greater sage-grouse Core Areas to the maximum extent practicable during the nesting season (March 1 through June 30), except when necessary to fulfill training mission requirements.

Finally, existing flight restrictions also apply over the bighorn sheep lambing area near the 45 Ranch—encompassing the Owyhee and South Fork Owyhee Rivers south to Coyote Hole in Idaho—as established under the 2023 *Mountain Home Airspace EIS* ROD (DAF 2023a).

### 3.12.1.3 Special Status Species

Appendix D includes a list of federal and state listed species that occur or have the potential to occur on Kingsley Field ANGB and under the military training airspace. This list was generated from the USFWS Information for Planning and Consultation (IPaC) tool (USFWS 2024a, 2024b), the ODFW Threatened, Endangered, and Candidate Fish and Wildlife Species List (ODFW 2024), the Oregon Department of Agriculture (2024), and Oregon Biodiversity Information Center (2019). A threatened and endangered species survey and report was completed for the ANGB in 2024 (173 FW 2024b). Seven federally listed threatened, endangered, or candidate species have the potential to occur at the base (USFWS 2024a). Four of these are also state listed. Three of the seven federally listed species have occurred historically at Kingsley Field ANGB: Applegate's milk-vetch (*Astragalus applegatei*), shortnose sucker (*Chasmistes brevirostris*), and Lost River sucker (*Deltistes luxatus*). Only Applegate's milk-vetch occurs on the base at present. No critical habitat occurs on the base.

A total of 39 federally listed, proposed to be federally listed, and candidate species have potential to occur under the military training airspace (USFWS 2024b) (see Table D-1, Appendix D). Though critical habitat for some species does occur under the military training airspace, as described in Section 3.12.1, actions within the military training airspace would have no potential to impact on these species and therefore they are not considered further.

Applegate's milk-vetch is a federally endangered and narrowly distributed endemic species known to occur only in southern Klamath County, Oregon. Applegate's milk-vetch was discovered in several populations throughout the LMT and Kingsley Field property. During a 2008 survey completed by USFWS of the entire airport (approximately 1,251 acres), approximately 21,000 plants were documented at 28 distinct sites (173 FW 2024b). Some of the land surveyed included 16 sites off airport property. Some of the sites with high concentrations of plants were not located within Kingsley Field ANGB such as site #44 containing over 3,000 individuals within a single acre. In 2009, the USFWS concluded during its 5-year review that the plant is enhanced by ongoing mowing at the airport. Additionally, mowing keeps competitive grasses low and prevents the milk-vetch from being shaded out. The USFWS also observed that graveled areas such as road shoulders provided good habitat for the plant on the airport property (173 FW 2024b). During a 2011 follow-up survey, approximately 1,900 individual plants in 23 separate sites were observed at Kingsley Field ANGB (173 FW 2024b). However, populations of Applegate's milk-vetch on base have declined in recent years, with only 178 individuals recorded in 2022. Applegate's milkvetch occurred in patches of bare soil among the non-native perennial grasslands that dominated the installation. Plants tended to occur at the edges of swales or depressions, but not within those depressions, and they were observed where the soils were cracked and appeared alkaline. Possible causes for the population decline at Kingsley Field ANGB may include drought and encroachment of invasive species (173 FW 2024b).

The Lost River sucker and shortnose sucker are federally endangered species that were observed in water bodies on the base during 2011 surveys. As of 2024, the base does not support the habitat that these fish require (NGB 2024d). A small number of Lost River and shortnose suckers were

historically found in the Lost River Diversion Channel that flows along the southern boundary of the airport property. However, habitat for the shortnose sucker and Lost River sucker does not exist on Kingsley Field ANGB as determined by the *Final Report Threatened and Endangered Species Surveys and Management Plan* (173 FW 2024b).

The yellow-billed cuckoo (*Coccyzus americanus*), gray wolf (*Canis lupus*), North American wolverine (*Gulo gulo luscus*), and monarch butterfly (*Danaus plexippus*) have the potential to occur at the base but have not been recorded there. The yellow-billed cuckoo is a long-distance migrant that occurs rarely in Oregon (Cornell University 2024). This species is generally found in wooded habitat with dense cover and water located nearby, including wooded areas with scrubby vegetation and dense thickets along waterbodies. Suitable habitat does not exist at Kingsley Field ANGB for the yellow-billed cuckoo (NGB 2024d), so any occurrence would likely be transient and rare.

The gray wolf inhabits a variety of habitats but overhunting and predator control programs in the 1900s resulted in severe population declines (USFWS 2024c). The gray wolf inhabits northern California and central Oregon, but intense development and human activity on the base would make a wolf occurrence highly unlikely. The gray wolf occupies large areas of forested landscapes with abundant ungulate populations; Kingsley Field ANGB does not contain forested habitat. The North American wolverine is found around Klamath Falls in north-central California and south-central Oregon (USFWS 2024d). Wolverines are highly territorial and require large areas of territory in high elevation, mostly sub-alpine and alpine ecosystems. Kingsley ANGB would not support the North American wolverine. The monarch butterflies that occur in Oregon are part of the California overwintering population and these monarchs generally do not migrate to Mexico but instead migrate along the west coast. Monarchs may pass through the base during their west coast migration.

A total of 17 migratory birds of concern were identified for the base by the USFWS IPaC System (USFWS 2024a). In addition, 76 migratory birds that occur on the USFWS Birds of Conservation Concern or are covered by the Bald and Golden Eagle Protection Act have the potential to occur under the military training airspace (USFWS 2024b). Table D-2 in Appendix D identifies each migratory bird species and its potential seasonal occurrence within the base and military training airspace.

#### 3.12.1.4 Wetlands

Three palustrine emergent wetlands totaling 0.29 acre occur on Kingsley Field ANGB (173 FW 2024c). All three wetlands were deemed Section 404 Non-Jurisdictional by the USACE, but Jurisdictional by the Oregon Department of State Lands (173 FW 2024c). Two out of the three wetlands occur within the vicinity of the project area near the eastern edge of Kingsley Field ANGB, but do not overlap the project locations. The third wetland is at the southern border of the Kingsley Field ANGB and is not shown in the figure. Common species within the wetlands include Baltic rush (*Juncus balticus*), broad-leaf cattail (*Typha latifolia*), spike rush (*Eleocharis palustris*), saltgrass (*Distichlis spicata*), Kentucky bluegrass (*Poa pratensis*), and greasewood (*Sarcobatus vermiculatus*) (173 FW 2024c).

### **3.12.2 Environmental Consequences**

Analysis of effects focuses on how construction and operations would affect biological resources. Determination of the significance of potential effects on biological resources is based on: (1) the importance (i.e., legal, commercial, recreational, ecological, or scientific) of the resource; (2) the proportion of the resource that would be affected relative to its occurrence in the region; (3) the sensitivity of the resource to proposed activities; and (4) the duration of ecological ramifications. Effects to biological resources would be significant if species or habitats of concern were adversely affected over relatively large areas or if disturbances caused reductions in population size or distribution of a special status species.

#### **3.12.2.1 No Action Alternative**

Under the No Action Alternative, the Proposed Action would not be implemented, and no F-35A beddown, associated operational changes, or beddown-related infrastructure construction would occur at LMT/Kingsley Field ANGB. 173 FW F-15C/D aircraft operations in the No Action timeframe results in a further reduction in operations (29 percent from Existing Conditions [2023]). Though the No Action Alternative assumes a reduction in operations at the airfield and in the military training airspace, biological resources would continue to be exposed to the noise associated with an airfield and in the military training airspace.

Construction activities would still be implemented under this alternative; however, effects would be localized and temporary. The site is relatively industrialized, and construction projects would occur outside of Applegate's milk-vetch areas, as documented in the Kingsley Field ANGB *Final Report Flora and Fauna Survey* (NGB 2023). BMPs would also be employed to minimize construction effects on water resources that could affect aquatic species.

As the No Action Alternative relies on the Existing Conditions (2023) for comparison purposes, effects on biological resources would remain consistent with the existing environment. No new construction-related effects on biological resources are expected beyond those already documented for Existing Conditions (2023). Therefore, there would be no significant effects on biological resources under the No Action Alternative.

#### **3.12.2.2 Proposed Action Alternative**

##### *Vegetation*

The base is composed of developed land and landscaped areas such as lawns, shrubbery, ornamental trees, and maintained, open fields of grass. Up to 704,900 SF of new impervious surfaces would result from construction activities. However, these would be within previously developed areas or actively managed landscaped areas. Therefore, there would be no significant removal of native plant communities and effects on vegetation would not be significant.

##### *Wildlife*

No construction, renovation, or demolition would occur beneath the military training airspace. Effects to wildlife on LMT/Kingsley Field ANGB from construction, renovation, or demolition would not be significant. Wildlife within the base is limited because habitat is primarily developed land and landscaped areas such as lawns, ornamental trees, or maintained open fields of grass. Noise associated with construction may cause mobile wildlife to temporarily avoid the area,

including those that are protected under the Migratory Bird Treaty Act (MBTA). Disturbed nests in the immediate vicinity of construction activities would be susceptible to abandonment and depredation. However, bird and wildlife populations in the vicinity of the base where project components would occur are accustomed to elevated noise associated with aircraft and general military industrial use. As a result, noise-related effects on wildlife behavior from construction noise would not be significant because the ambient noise levels within the vicinity are already elevated under Existing Conditions (2023) and would be unlikely to substantially increase by the relatively minor and temporary nature of construction under the Proposed Action. Any loss of commonly occurring individuals would not represent a noticeable portion of the population; therefore, no significant effects on wildlife would occur.

Operational noise levels at LMT/Kingsley Field ANGB would be expected to increase from Existing Conditions (2023) with the conversion to the F-35A aircraft from the F-15C/D. The majority of this area is primarily residential, commercial, industrial, and agricultural lands with little to no native wildlife habitat. Changes in operational noise would not be expected to significantly affect terrestrial species in the area because species on and near the base are likely accustomed to elevated noise levels associated with aircraft and military operations as well as commercial, industrial, and agricultural activities.

As summarized in Section 3.2 and the *Final Noise Study* (DAF 2026), modeled military training airspace noise under the Proposed Action would increase relative to the No Action Alternative, including higher single-event noise levels for F-35A operations and increases in cumulative military training airspace noise levels ( $L_{dnmr}$ ) in analyzed MOA/ATCAA areas. However, modeled military training airspace noise levels under the Proposed Action (up to 49 dB  $L_{dnmr}$ , depending on the MOA/ATCAA) would remain well below levels associated with wildlife hearing damage and below conservative continuous-noise screening levels identified in the literature (Bowles 1995). Similarly, modeled supersonic noise (maximum CDNL of 40 dBC in the Juniper/Hart MOA complex) would remain low and would not be expected to result in wildlife effects.

While a rare event due to size of the military training airspace and the typical altitude and frequency of operations, wildlife could be exposed to a brief overflight and associated peak noise ( $L_{max}$ ) of up to 119 dB at 500 feet AGL. Flights at 500 to 5,000 feet AGL comprise approximately 2 percent of training activity, and  $L_{max}$  decreases with altitude (e.g., approximately 91 dB at 5,000 feet AGL and 81 dB at 10,000 feet AGL). Exposure to these peak noise levels would be brief (seconds in duration), and the highest levels would occur only immediately beneath the flight path, with rapid attenuation away from the flight path. No harm to animal hearing would be anticipated as damage to hearing generally occurs at substantially higher levels (approximately 140 to 150 dB) (Bowles 1995). Additionally, research has demonstrated that bird responses to aircraft overflight are generally minor and generally do not affect nesting success, with flushing and other negative responses more likely at close distances and/or with repeated disturbance (Air Combat Command 2008; Delaney et al. 1999; Ellis et al. 1991; Mancini et al. 1988).

The proposed training would be episodic, and would not create a consistent, significant noise source in any one location. In the military training airspace, modeled cumulative subsonic noise under the Proposed Action would be up to 49 dB  $L_{dnmr}$ , and modeled supersonic noise would be up to 40 dBC CDNL. Collectively, these noise levels, the episodic nature of training, and the predominance of operations above 10,000 feet MSL would result in no significant effect to wildlife under the Proposed Action.

The effects described above for noise impacts on wildlife would also apply to greater sage-grouse. Existing biological resource protection measures described in Section 3.12.1.2 would continue to apply under the Proposed Action, including avoidance of low-level flights over greater sage-grouse Core Areas to the maximum extent practicable during the breeding season (March 1 through June 30), except when necessary to accomplish the training mission. As described in Section 3.12.1.2, previously adopted biological resource protection measures associated with the 2017 *Oregon Airspace EIS* (NGB 2017) and associated ROD would continue to apply to applicable military training activities under the Proposed Action. These measures include seasonal nest buffers and flight restrictions for bald and golden eagles, annual coordination to obtain current nesting information and adjust nest buffers, and procedures to coordinate and deconflict biological survey flight operations. Additionally, existing flight restrictions over the bighorn sheep lambing area near the 45 Ranch (over the Owyhee and South Fork Owyhee Rivers, south to Coyote Hole) in Idaho, as established through the 2023 *Mountain Home Airspace EIS* (DAF 2023a), would continue to apply under the Proposed Action.

Since the number of airfield operations would increase under the Proposed Action, bird/wildlife aircraft strikes, including those with migratory birds, may also rise. Between 2005 and 2019, 96 bird strikes were reported at or near LMT/Kingsley Field ANGB, with peaks observed in June, September, and October (NGB 2024d). Most strikes involved small perching birds or passerines; however, 173 FW aircraft have also struck larger species such as raptors, wading birds, shorebirds, and waterfowl (NGB 2024d). Notably, 96 percent of aircraft flights occur above 10,000 feet MSL, higher than most bird flight altitudes. Over 90 percent of reported strikes occur at or below 3,000 feet AGL, though strikes at higher altitudes are common during migration. Ducks and geese have been observed up to 7,000 feet AGL (FAA 2024d). Under the Proposed Action, 6 percent of flights would occur below 10,000 feet MSL, where the risk of bird/wildlife strikes is highest. Although the proportion of flights below 10,000 feet MSL would remain low, the higher number of flights under the Proposed Action compared to the No Action Alternative would increase overall strike risk. Adherence to the BASH program would minimize strike risk (see Section 3.10, *Safety*). The 173 FW has established detailed procedures to reduce bird/wildlife aircraft strikes, including monitoring and responding to elevated risks. When risk is heightened, restrictions are placed on low-altitude flights and certain training activities (e.g., multiple approaches, closed pattern work) near the airport. Pilots receive special briefings whenever the potential for increased strikes exists within the military training airspace.

The Proposed Action would not change the locations, rates, or operating procedures for chaff and flare use. Therefore, the Proposed Action would not introduce a new or expanded pathway for biological resource effects, including wildfire-related effects, relative to the No Action Alternative.

#### *Special Status Species*

As documented in the *Kingsley Field Air National Guard Base Final Report Flora and Fauna Survey*, December 2023 (NGB 2023) and the *Integrated Natural Resources Management Plan* 2024 (NGB 2024d), the only threatened and endangered species occurring on base is Applegate's milk-vetch. No construction would occur in the vicinity of areas where Applegate's milk-vetch has been observed, and no construction, demolition, or renovation would occur beneath the military training airspace.

In accordance with the *Installation Development Plan* (NGB 2015), the current policy is that there can be no loss of Applegate's milk-vetch without replacement. By FAA determination, the replacement cannot be accomplished on other airport properties. If the off-site replacement cannot be found and purchased, the State of Oregon will not allow a project to proceed. Transplanting this plant is challenging and usually unsuccessful, so replacement must be made by purchasing and protecting land with an existing Applegate's milk-vetch population.

Proposed construction would not affect the shortnose sucker and Lost River sucker since these species do not occur on the base. BMPs would still be used to avoid any effects on water resources from the proposed construction (see Section 3.7, *Water Resources*). Effects to bird species protected under the MBTA and Bald and Golden Eagle Protection Act would be the same as described in the *Wildlife* section above. Therefore, construction associated with the Proposed Action would not affect special status species.

Annual military airfield operations at LMT/Kingsley Field ANGB would increase under the Proposed Action. Changes in operational noise would not be expected to affect terrestrial species in the area because species on and near the base are likely accustomed to elevated noise levels associated with aircraft and military operations, and the large geographic area of the military training airspace coupled with the episodic nature of training at levels mostly above 10,000 feet MSL at high rates of speed, result in limited noise effects in any one area. Effects to potentially occurring federally or state listed species on the base and underlying the military training airspace used by the 173 FW would be similar to those described within the *Wildlife* section. Since threatened and endangered species may experience temporary and brief noise disturbances, airfield operations under the Proposed Action may affect, but are not likely to adversely affect threatened and endangered terrestrial mammals, reptiles, and birds.

Military readiness operations are exempt from the prohibitions of the MBTA, provided they do not result in a significant adverse effect on populations of migratory bird species. Regardless, migratory birds occurring on the base would not be expected to be significantly affected by the noise from the F-35A at LMT/Kingsley Field ANGB since they would already be habituated to aircraft noise from existing operations. Additionally, 96 percent of flights in the military training airspace would occur over 10,000 feet MSL which is much higher than most bird flight. An increase in airfield operations may result in a slight increased opportunity for bird/wildlife aircraft strikes to occur, including those with migratory birds. However, adherence to the existing BASH program would minimize the risk of bird/wildlife aircraft strikes (see discussion in the *Wildlife* section, and Section 3.10, *Safety*).

Critical habitat that occurs beneath the military training airspace is unlikely to be affected by operational changes under the Proposed Action. No ground disturbance under the military training airspace would occur, and ordnance use including chaff and flares would not increase from current conditions. Brief and intermittent noise disruptions would not significantly negatively affect critical habitat. Therefore, the critical habitat that occurs under the military training airspace would experience no effect from the Proposed Action.

The DAF conducted informal consultation with the USFWS under Section 7(a)(2) of the Endangered Species Act for the basing of the F-35A FTU at Kingsley Field ANGB, including associated construction and airspace activities. The consultation package included the Request for Initiation of Informal Consultation and supporting biological assessment documentation and was



submitted to USFWS on November 21, 2024. USFWS concurred with the determination that the Project may affect, but is not likely to adversely affect federally listed species and designated critical habitat. Informal consultation is complete, and formal consultation is not anticipated based on the current Proposed Action.

#### Wetlands

None of the proposed construction or facility renovation projects associated with the Proposed Action are located in or adjacent to any wetland area; therefore, there is no anticipated effect to wetlands.

### **3.12.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that warrant additional consideration for biological resources or wetlands. Biological resources at LMT/Kingsley Field ANGB and beneath the military training airspace would continue to be influenced by existing land uses, ongoing airport and military operations, habitat conditions, and natural environmental variability under both the Proposed Action and the No Action Alternative.

At LMT/Kingsley Field ANGB, biological resources occur within a predominantly developed and actively managed environment. Existing vegetation management, wildlife management, and conservation measures would continue. Populations of Applegate's milk-vetch at Kingsley Field ANGB have declined in recent years, with drought and encroachment of invasive species identified as potential contributing factors. Existing management requirements for Applegate's milk-vetch and other protected biological resources would continue to apply.

Wildlife within and beneath the military training airspace would continue to be exposed to existing aircraft operations and associated noise, as well as other ongoing land uses unrelated to the Proposed Action. Existing avoidance measures, wildlife management practices, and coordination requirements applicable to sensitive species and habitats would also continue. Wetland conditions at Kingsley Field ANGB are not expected to materially change in the absence of a specific action affecting those resources. These environmental trends would not alter the conclusions regarding biological resources or wetlands effects identified for the Proposed Action or the No Action Alternative.

### **3.13 VISUAL RESOURCES**

#### **3.13.1 Affected Environment**

Visual effects deal broadly with the extent to which the Proposed Action or alternative(s) would either: (1) contrast with, or detract from, the visual resources and/or the visual character of the existing environment; or (2) produce light emissions that create annoyance or interfere with activities.

The ROI for visual resources primarily consists of LMT/Kingsley Field ANGB, with additional information presented for the surrounding vicinity, where relevant. The visibility of aircraft, contrails, or lights does not constitute an adverse effect unless it diminishes the integrity of a property's historic significance (FAA 2025a). Therefore, effects on visual resources under the Proposed Action's operations within military training airspace are not carried forward for analysis

except as they relate to cultural resources (see Section 3.9, *Cultural Resources*). Effects on visual resources as they relate to construction and operations at the base are analyzed.

#### 3.13.1.1 Visual Character

Klamath Falls is mainly comprised of suburban development surrounded by agricultural farmland. The city lies in the eastern foothills of the Cascade Mountain Range and the dominant visual feature is Mount Shasta, often displaying a snowcapped peak. Klamath Falls also consists of two lakes and two rivers. The visual environment at LMT/Kingsley Field ANGB is characteristic of an industrial airfield environment and is primarily surrounded by agricultural farmland and forests (City of Klamath Falls 2016). Agricultural uses are located to the west, south and east. Views from the airport and base include tree cover, shrubs, the Cascade Range, and rural farmland.

The visual environment specific to Kingsley Field ANGB is characteristic of a military base; most structures are one to two-story buildings constructed primarily of beige brick-tone masonry or beige corrugated metal. Grass lawn areas and ornamental trees and shrubs are prevalent throughout the base and serve as a buffer between buildings, roads, and other developed areas. Public views of Kingsley Field ANGB are available at LMT and for those traveling on Springlake Road, although views of the base off Springlake Road are obstructed by LMT. The viewshed does include views of the Cascade Mountain Range when weather and air quality conditions allow. There are no other substantial natural landforms or manmade structures dominating the viewshed.

#### 3.13.1.2 Light Emissions

Existing light emissions at LMT/Kingsley Field ANGB are associated with runway and taxiway edge lighting, approach lighting systems, and other visual safety navigational aids. Additionally, apron ramp lighting, building security lighting, and street lighting on access roadways create light emissions from LMT/Kingsley Field ANGB. The surrounding community produces light emissions associated with things like street lighting for nearby highways (Southside Expressway and Highway 39); street lighting on arterial/collector roads; headlights/brake lights from automobiles; neighboring residential, commercial, and industrial areas (building security lights, household/commercial interior and exterior lighting); and lighted parking lots or sports fields.

### 3.13.2 Environmental Consequences

#### 3.13.2.1 No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented, and no F-35A beddown, associated operational changes, or infrastructure construction related to the beddown would occur at LMT/Kingsley Field ANGB. Although the 173 FW no longer conducts regular F-15C/D operations at Kingsley Field, the No Action Alternative retains the operational assumptions from the Existing Conditions (2023) data for comparison purposes, including a 29 percent reduction in operations. Basic activities at the base would continue as they do under Existing Conditions (2023), and construction and repair projects necessary to support ongoing base operations would be implemented. The visual environment would remain largely consistent with that described in Section 3.13.1. Therefore, no significant effects on visual resources would be anticipated under the No Action Alternative.

### 3.13.2.2 Proposed Action Alternative

#### Visual Character

There are no aesthetically sensitive locations or designated historic districts within the viewshed of the proposed construction areas. All proposed construction would be located within Kingsley Field ANGB and would be visually consistent with the appearance of existing infrastructure.

During the proposed construction and demolition activities, the visual characteristics of areas undergoing development would be temporarily altered by the use of construction equipment, and the delivery and stockpiling of construction materials. At the completion of construction, the proposed facilities and associated infrastructure would remain as permanent visual features within the viewshed; however, the principal visual features of the facilities would remain consistent with the existing military setting and visual character of Kingsley Field ANGB. After construction is complete and the F-15C/D aircraft replaced, there would be additional frequency of aircraft operations in the viewshed of the base, as described in Section 2.1. However, the area surrounding the base is primarily rural and there would not be significant effects on the viewshed given that there would not be any new activities. Any visual effects from these construction projects or additional aircraft operations as a result of the Proposed Action would not be significant.

#### Light Emissions

The Proposed Action would not substantially increase light emissions or create visual effects. Nighttime operations at LMT would remain low, comprising 2 percent of operations, and would not significantly increase the overall nighttime light emissions in the ROI. Construction of new facilities, parking lots, and roads within the base would include security lighting and street lighting, as applicable. The proposed renovation to Taxiway A (Project 15) would include taxiway edge lighting and other additional visual safety aids. The existing environment as it relates to light emissions is characteristic of an industrial airfield environment. The characteristics of most airport lighting systems create potential sources of annoyance to nearby residents, such as visual Navigational Aids, edge lights, and others, which emanate light emissions. There would be no appreciable net increase of light emissions that is inconsistent with the current environment and therefore no significant effects.

### **3.13.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that warrant additional consideration for visual resources. The visual environment at LMT/Kingsley Field ANGB and in the surrounding area would continue to reflect the existing developed airfield, military installation, agricultural, and community setting under both the Proposed Action and the No Action Alternative.

Existing sources of nighttime lighting associated with airport and installation operations, transportation infrastructure, and surrounding residential, commercial, and industrial development would also continue. No environmental trends have been identified that would be expected to substantially alter the visual character or existing lighting conditions within the ROI during the period of analysis.

These environmental trends would not alter the conclusions regarding visual resource effects identified for the Proposed Action or the No Action Alternative.

### **3.14            INFRASTRUCTURE/UTILITIES/NATURAL RESOURCES AND ENERGY SUPPLY/ TRANSPORTATION/PUBLIC TRANSPORTATION**

#### **3.14.1        Affected Environment**

Infrastructure refers to the system of public works, such as utilities and transportation, which provide the underlying framework for a community. Utilities include water, power supply, and waste management. Transportation encompasses roadways, vehicle movement, pedestrian and bicycle traffic, and mass transit. Analysis of Natural Resources and Energy Supply evaluates a project's consumption of natural resources (e.g., water, asphalt, aggregate, wood) and energy supplies (e.g., electricity, natural gas for heating, fuel for aircraft and ground vehicles). Consumption of natural resources and energy use may result from construction, operation, and maintenance of the Proposed Action or No Action Alternative.

All DoW installations are required to proactively plan and assess infrastructure, utility requirements and essential services to accommodate personnel increases and their dependents. Kingsley Field ANGB routinely evaluates community facilities and services to address changes from new or deployed units. Infrastructure or utility needs are identified during project planning, and if additional capacity is required, it is incorporated into the project, ensuring deficiencies are addressed early.

The ROI for infrastructure primarily includes Kingsley Field ANGB, with relevant information about the adjacent area, including local and municipal natural resource and energy sources. The ROI excludes land beneath military training airspace, as no ground disturbance, construction, or infrastructure changes would occur. Evaluated infrastructure components include potable water, wastewater, stormwater, electrical and natural gas systems, solid waste management, and transportation networks.

##### **3.14.1.1      Potable Water**

Potable water for Kingsley Field ANGB is provided by the City of Klamath Falls. The City of Klamath Falls' water supply system connects to the LMT potable water system through two water lines, which tie into the City of Klamath Falls' 16-inch main water line (NGB 2015). After entering the Kingsley Field ANGB main line, water is dispersed to different facilities throughout the base via laterals of various sizes. The city's water supply comes from groundwater that is supplied by 11 wells in the region. In 2020, the City of Klamath Falls Water Division produced approximately 2.5 billion gallons of potable water, with a potential maximum day production of 26.5 million gallons (City of Klamath Falls 2020). Kingsley Field ANGB is one of the City's top water users (City of Klamath Falls 2020). The combined usage of water from LMT and Kingsley Field ANGB in FY 2023 was approximately 22 million gallons (Kingsley Field ANGB 2024).

##### **3.14.1.2      Wastewater**

Kingsley Field ANGB manages their own domestic and industrial wastewater collection system within the operational boundary of the base, separate from the airport (Oregon ANG 2023b). Wastewater is conveyed into the City of Klamath Falls municipal system. The base system consists of a series of gravity lines, pump stations, and septic systems (NGB 2015).

#### 3.14.1.3 Stormwater

Kingsley Field ANGB has multiple stormwater conveyances, including drainage basins and outfalls shared with the LMT (Oregon ANG 2023b). Stormwater from the base drains to Klamath Irrigation District ditches and is then discharged to the Lost River, about 2 miles southeast of LMT (City of Klamath Falls 2021). The surface water runoff from the base is discharged to five permitted outfalls or internal observation points located on all sides of the base (Oregon ANG 2023b). Stormwater runoff is discharged from different ditches, canals, and culverts into various drains that eventually drain to the Lost River Diversion Channel.

Kingsley Field ANGB maintains a SWPPP as a BMP to monitor stormwater discharge, manage stormwater, and comply with the LMT's Oregon DEQ NPDES General Stormwater Discharge Permit (1200-Z).

#### 3.14.1.4 Electrical and Natural Gas

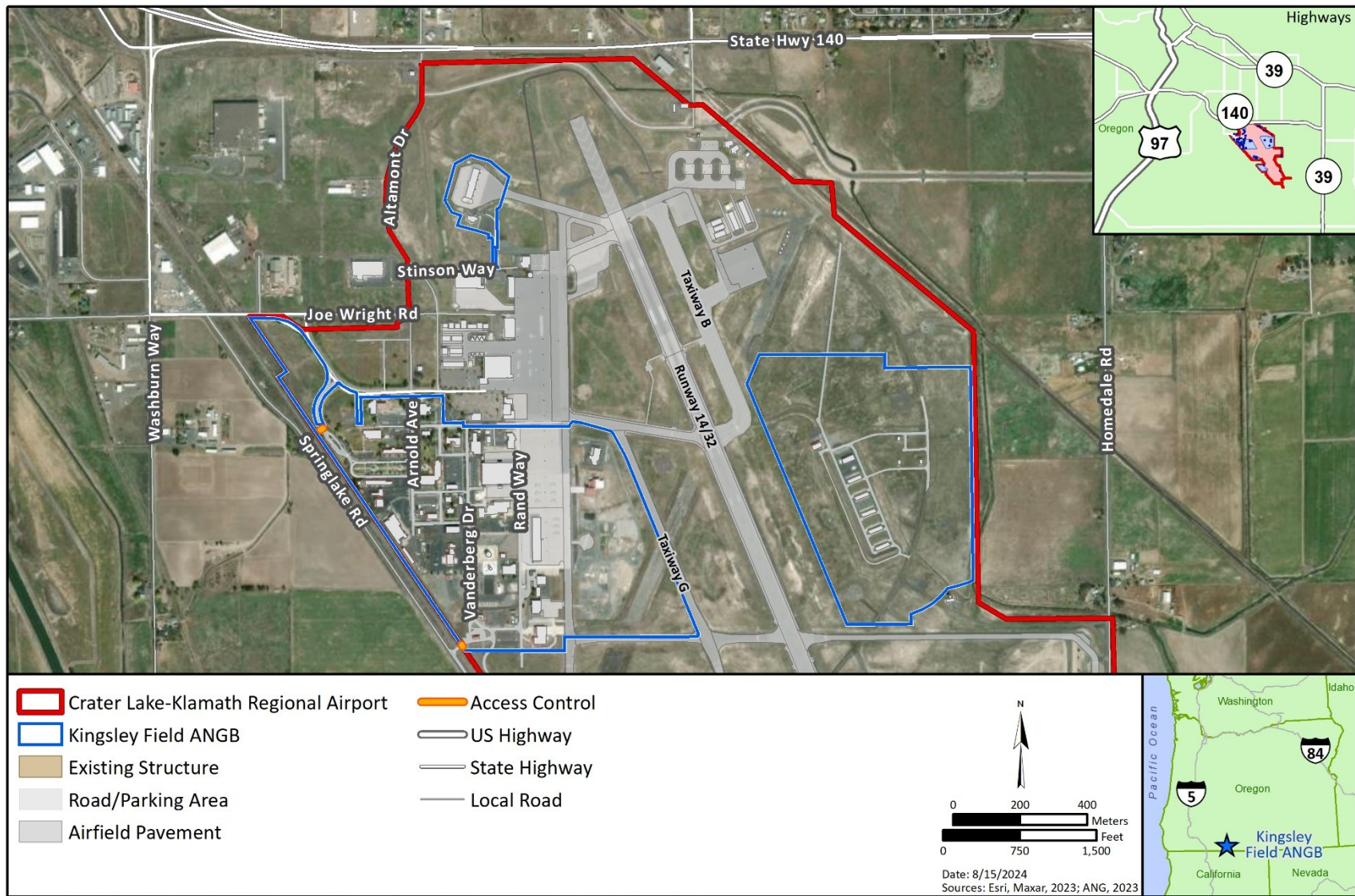
Electricity and natural gas are supplied to Kingsley Field ANGB by PacifiCorp and Avista Utilities (City of Klamath Falls 2021). Electricity consumption for 2023 at Kingsley Field ANGB and LMT was 5,722,316 kilowatt-hours (Kingsley Field ANGB 2024). Natural gas consumption for FY 2023 was 212,025 hundred cubic feet (Kingsley Field ANGB 2024).

#### 3.14.1.5 Solid Waste

Municipal solid waste at Kingsley Field ANGB is managed under the 173 FW Integrated Solid Waste Management Plan (Oregon ANG 2021) and guidelines established in DAFMAN 32-7002, Environmental Compliance and Pollution Prevention. Solid waste is collected by Waste Management Inc. or the Klamath County Solid Waste Division and disposed of at the Klamath County Landfill (Oregon ANG 2021). LMT and Kingsley Field ANGB produced 2,009 tons of solid waste in FY 2023 (Kingsley Field ANGB 2024).

#### 3.14.1.6 Transportation

LMT/Kingsley Field ANGB is located approximately 5 miles south of downtown Klamath Falls. U.S. Highway 97 is the primary access road to Klamath Falls. Regional access to Klamath Falls from the east and west is provided by State Route 140, connecting Klamath Falls to Medford and Ashland, Oregon. Kingsley Field ANGB is accessed via the Main Gate located on Airport Way (Figure 3.14-1), just south of Joe Wright Road (County Highway 803). Joe Wright Road connects to U.S. Highway 97 to the west and State Highway 140 via Washburn Way. Washburn Way is a major north-south road that also provides access from Klamath Falls to Kingsley Field ANGB. A secondary gate to Kingsley Field ANGB is located on County Highway 876/Spring Lake Road (Figure 3.14-1); however, this gate is only used when needed or for construction traffic access and remains closed on most weekdays.



**Figure 3.14-1 Transportation Network for Kingsley Field ANGB**



Traffic conditions for the weekday afternoon peak hour at key intersections along State Highway 140 proximate to Kingsley Field were studied for the *Klamath Falls Urban Area Transportation System Plan* (City of Klamath Falls 2012). The study assigned levels of service for these key intersections. Levels of service range from A to F, with A indicating a free-flow of traffic and Level F indicating stop-and-go waves with traffic exceeding the amount that can be served. The Washburn Way/State Highway 140 intersection consists of ramps connecting the two roads via the Washburn Way overpass; the level of service at weekday afternoon peak hour conditions is C (indicating stable but restricted flow with significant interactions with others in the traffic stream) for the westbound ramps and F for the eastbound ramps. The intersection of U.S. Highway 197 and Joe Wright Road was not studied (City of Klamath Falls 2012).

The road network at LMT/Kingsley Field is a series of streets in a grid pattern. The primary entry through the Main Gate accesses Kingsley Way/Fighter Alley, which routes vehicles to the McConnell Circle entrance to the base. Vandenberg Drive and Arnold Avenue are the primary north-south streets through the base and Gentile Street and Bong Street are the primary east-west streets at Kingsley Field ANGB. Traffic control at intersections is signed, and there are no signalized intersections at Kingsley Field ANGB.

Parking is available at 12 parking lots providing space for 721 vehicles at Kingsley Field ANGB. No specific overflow parking is designated at the base.

### **3.14.2 Environmental Consequences**

Potential effects on infrastructure elements are assessed in terms of effects of the Proposed Action on existing service levels. Effects on public services/utilities and transportation networks are assessed with respect to the potential for disruption or improvement of current utility systems and traffic circulation patterns and deterioration or improvement of existing levels of service on local roads. Effects may arise from physical changes to circulation or utility corridors, construction activity, and introduction of construction-related traffic and utility use.

Effects as a result of energy and natural resources consumption may include disruption, degradation, or improvement of existing levels of service or potential change in demand for energy or natural resources. Adverse effects on roadway capacities would be significant if roads with no history of capacity exceedance had to operate at or above their full design capacity as a result of an action. Transportation effects may arise from changes in traffic circulation, delays due to construction activity, or changes in traffic volumes.

#### **3.14.2.1 No Action Alternative**

Under the No Action Alternative, the Proposed Action would not be implemented, and no F-35A beddown, associated operational changes, or infrastructure construction related to the beddown would occur at LMT/Kingsley Field ANGB. Although the 173 FW no longer conducts regular F-15C/D operations at Kingsley Field, the No Action Alternative retains the operational assumptions from the Existing Conditions (2023) data for comparison purposes, including a 29 percent reduction in operations. Basic activities at the base would continue as they do under Existing Conditions (2023), and construction and repair projects necessary to support ongoing base operations would be implemented.



The demand for water (e.g., if used to control dust) could increase during demolition and construction phases associated with the No Action Alternative. However, this increase would be temporary and intermittent and would not be expected to affect regional water supply.

Under the No Action Alternative, there would be approximately 331,600 SF of new impervious surfaces as a result of proposed construction. In accordance with the Energy and Independence Security Act Section 438, any temporary increase in surface water runoff as a result of the proposed construction would be attenuated through the use of temporary and/or permanent drainage management features; these drainage management features would tie into existing drainage structures where appropriate. The proposed construction activities could temporarily affect the quality of stormwater runoff. However, implementation of appropriate standard construction practices (as described previously), preventative maintenance, and periodic inspections and sampling to detect risk to stormwater, especially during active construction activity, would minimize these potential effects (see Section 3.7, *Water Resources*). Therefore, effects on the existing stormwater drainage system as a result of the No Action Alternative would not be significant.

Construction activity associated with the No Action Alternative could result in some interruptions of utility services during construction. These effects would be temporary, occurring briefly during active construction periods. In addition, the demand for energy (primarily electricity) could increase slightly during demolition and construction phases. The energy supply at the base and in the region is adequate and would not be affected by this temporary increase in demand. Therefore, effects related to energy systems would not be significant.

Under the No Action Alternative, approximately 336,000 SF of construction footprint would generate construction and demolition debris requiring landfill disposal. Multiple proposed demolition projects would result in a temporary increase in solid waste generation, and the modest increase in personnel and equipment use would also contribute slightly to long-term waste. However, effects on local landfills are not expected to exceed permitted throughput or reduce available capacity.

Off-base contractors conducting construction and demolition activities at Kingsley Field ANGB would be responsible for disposing of waste in accordance with federal, state, and local regulations. Much of the C&D material could be recycled, reused, or otherwise diverted from landfills, while non-recyclable waste would be collected in dumpsters for removal. Kingsley Field ANGB would continue to manage solid waste under its Integrated Solid Waste Management Plan. Therefore, effects on solid waste management under the No Action Alternative would not be significant.

Consumption of energy and natural resources would increase slightly due to the small increase in personnel at Kingsley Field ANGB. However, these changes would not result in significant effects.

#### 3.14.2.2 Proposed Action Alternative

##### Potable Water

Water consumption would be expected to increase slightly as a result of the small increase in personnel; however, an increase of up to 30 personnel on the base would not be expected to affect regional water supply. Additionally, the demand for water (e.g., if used to control dust) could also increase during demolition and construction phases. However, this increase would be temporary

and intermittent and would not be expected to affect regional water supply. Therefore, effects on potable water would not be significant under the Proposed Action.

#### Wastewater

Wastewater generation would be expected to increase slightly as a result of the increase of up to 30 personnel on the base. However, there have been no deficiencies identified with the existing system, and it is expected that the existing sanitary sewer system is generally adequate to serve the facilities proposed under this alternative. Therefore, effects on the management of wastewater would not be significant under the Proposed Action.

#### Stormwater

Under the Proposed Action, approximately 933,050 SF of temporary soil disturbance would occur, including up to 704,900 SF of new impervious surfaces associated with construction. Any temporary increase in surface water runoff would be managed through temporary or permanent drainage features designed to meet Section 438 of the Energy Independence and Security Act. These features would connect to existing drainage systems where appropriate. Construction activities could temporarily affect stormwater quality; however, applying standard construction practices, preventative maintenance, and regular inspections and sampling during active construction would minimize these potential effects (see Section 3.7, *Water Resources*). Therefore, effects on the existing stormwater drainage system due to construction would not be significant.

For stormwater management features that would connect to or discharge through infrastructure owned or managed by others, including Klamath Irrigation District drainage facilities, the DAF would coordinate, as appropriate, during final design to identify applicable drainage connections, design requirements, and infrastructure constraints. Stormwater design calculations and supporting analyses would be completed during final design and permitting, as required by applicable stormwater requirements.

#### Electrical and Natural Gas

Demand for electricity and natural gas would be expected to increase slightly due to the increase in 30 personnel, and the building space and facilities to be constructed would require more electricity. However, any new facilities and additions associated with this alternative would be implemented with more energy-efficient design standards and utility systems than are currently in place. In addition, construction projects would incorporate Leadership in Energy and Environmental Design and sustainable development concepts to achieve optimum resource efficiency, sustainability, and energy conservation. Therefore, average energy consumption would be expected to stay the same or decrease compared to energy consumption associated with existing facilities. In addition, an increase of up to 30 personnel on the base would not be expected to affect regional energy supply.

Construction activity associated with the Proposed Action could result in some interruptions of utility services during construction. These effects would be temporary, occurring briefly during active construction periods. In addition, the demand for energy (primarily electricity) could increase slightly during demolition and construction phases. The energy supply at the base and in the region is adequate and would not be affected by this temporary increase in demand. Therefore, effects related to energy systems would not be significant.

### Solid Waste

Under the Proposed Action, construction would cover a 933,050 SF footprint, generating construction and demolition debris requiring landfill disposal. Several demolition projects would substantially increase solid waste generation. However, effects on local landfills are not expected to exceed permitted throughput or significantly reduce remaining capacity. Off-base contractors performing construction and demolition at Kingsley Field ANGB would be responsible for disposing of generated waste, adhering to federal, state, and local regulations for municipal solid waste collection and disposal. Much of the waste can be recycled, reused, or diverted from landfills. Non-recyclable construction and demolition waste would be collected in dumpsters until removed. Debris from Project 15, Taxiway A, would produce a significant volume of concrete waste. Kingsley Field ANGB would manage solid waste under its Integrated Solid Waste Management Plan. Effects related to solid waste management would not be significant.

### Transportation

An additional 30 personnel would utilize the surrounding access roads to Kingsley Field ANGB as well as the on-base transportation network. Regional roads leading to the Main Gate have varied levels of traffic congestion during peak morning and afternoon travel times; however, the number of additional vehicles associated with the Proposed Action commuting to Kingsley Field ANGB daily is very low and not anticipated to affect the current roadway level of service. The on-base transportation network would be slightly affected by the increase in base personnel. The main gate has adequate capacity to handle the additional vehicles entering and existing the base.

Under the Proposed Action, construction, renovation, and demolition projects would affect the local transportation network short-term in and around Kingsley Field ANGB. The extra vehicles stationed at the base during construction may increase traffic and reduce circulation, but the effects would be temporary. Additionally, the secondary base access gate could be utilized to alleviate construction traffic entering and exiting the base. Proposed transportation Projects 16 and 17 would have a positive effect on parking and traffic congestion on base. To further reduce potential effects on transportation, the construction contractor would develop a Traffic Control Plan. Therefore, there would be no significant effects on transportation from the Proposed Action.

### **3.14.3 Reasonably Foreseeable Actions and Environmental Trends**

No reasonably foreseeable actions have been identified that warrant additional consideration for infrastructure, utilities, natural resources and energy supply, transportation, or public transportation. Existing utility and infrastructure systems serving LMT/Kingsley Field ANGB and the surrounding community would continue to operate under both the Proposed Action and the No Action Alternative. Kingsley Field ANGB would also continue to evaluate infrastructure and utility requirements as part of routine installation planning and would address identified capacity or service requirements through applicable project planning and design processes.

Demand for potable water, wastewater treatment, electricity, natural gas, solid waste management, and transportation services would continue to reflect ongoing installation, airport, and surrounding community activities. Existing transportation conditions, including variations in congestion during peak travel periods on regional roadways, would also continue.

No environmental trends have been identified that would be expected to substantially alter the capacity or availability of infrastructure, utilities, natural resources, energy supplies, or

transportation systems within the ROI during the period of analysis. These environmental trends would not alter the conclusions regarding effects identified for the Proposed Action or the No Action Alternative.

## **APPENDIX A    CONSTRUCTION FOOTPRINT MAP**

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## **APPENDIX B      CONSULTATION**

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**APPENDIX B1**  
**AGENCY CORRESPONDENCE**

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**DEPARTMENT OF THE AIR FORCE  
WASHINGTON DC**

**OFFICE OF THE ASSISTANT SECRETARY**

SAF/IEI  
1665 Air Force Pentagon  
Washington DC 20330-1665

William "Chuck" Garrison  
Director, Northwest Mountain Airports Division  
Federal Aviation Administration  
2200 S 216th Street  
Des Moines WA 98198

Dear Mr Garrison

The Department of the Air Force (DAF) proposes to beddown F-35A Lightning II (F-35A) aircraft to replace the existing F-15 C/D aircraft at the 173rd Fighter Wing (173 FW), a unit of the Oregon Air National Guard, stationed at Kingsley Field Air National Guard Base, Klamath Falls, Oregon. The DAF previously invited the Federal Aviation Administration (FAA) to participate as a Cooperating Agency (CA) on the Environmental Assessment (EA) for the beddown of F-15 EX Eagle II aircraft at the 173 FW and the FAA's Office of Airports accepted the invitation in a letter signed 13 May 2022 (copy attached).

The DAF is elevating the analysis from an EA to an Environmental Impact Statement (EIS) as a result of a change to the previously defined scope. Consequently, the DAF requests that the FAA continue to participate as a CA in the preparation of the new FAA jurisdiction and statutory responsibilities as described in the Airport and Airway Improvement Act of 1982 (49 United States Code 47101) and Section 163 of the 2018 FAA Reauthorization Act.

This CA arrangement is established pursuant to 40 Code of Federal Regulations (CFR) § 1501.8, Cooperating Agencies. As the lead, the DAF requests the FAA CA support by:

- Participating in the scoping process;
- Assuming responsibility, upon request by the DAF, for developing information and preparing analyses, including portions of the EIS, on issues for which the FAA has special expertise;
- Making staff support available to enhance interdisciplinary review capability and provide specific comments;
- Providing review and comments within the timelines prescribed in the program milestone schedule; and
- Responding in writing to this request.

The DAF will act as the Lead Agency for purposes of compliance with Section 7 of the Endangered Species Act of 1973, as amended (16 USC §1536); Section 106 of the National

Historic Preservation Act of 1966 (54 USC §300101 et seq.) and implementing regulations (36 CFR 800); and similar regulatory consultation or coordination requirements.

Should you or your staff have further questions regarding the subject EIS or this request, our point of contact at Headquarters Air Force is Mr. Jack Bush at (703) 614-0237 or [jack.bush@us.af.mil](mailto:jack.bush@us.af.mil) and at Headquarters National Guard Bureau, our points of contact are Ms. Kristi Kucharek at (240) 612-9471 or [kristi.kucharek@us.af.mil](mailto:kristi.kucharek@us.af.mil), and Lt Col Matthew Curtin at (805) 588-0532 or [matthew.curtin.1@us.af.mil](mailto:matthew.curtin.1@us.af.mil).

Sincerely

ROBERT E. MORIARTY, P.E., SES  
Deputy Assistant Secretary of the Air Force  
(Installations)

Attachment:  
FAA F-15EX EA CA response letter

cc:  
SAF/GCN  
AF/JAOE  
AF/A4C  
NGB/A4A/A8/JA



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Northwest Mountain Region  
Seattle Airports District Office  
2200 S. 216<sup>th</sup> Street  
Des Moines, WA 98198

July 25, 2023

Mr. Robert E. Moriarty, P.E., SES  
Deputy Assistant Secretary of the Air Force (Installations)  
SAF/IEI  
1665 Air Force Pentagon  
Washington DC 20330-1665

Dear Robert Moriarty:

Thank you for your letter signed June 13, 2023 requesting the Federal Aviation Administration (FAA) participate as a Cooperating Agency (CA) to the Department of the Air Force (DAF) preparation of an Environmental Impact Statement (EIS). The EIS is for the proposed beddown of F-35A Lightning II (F-35A) aircraft at Crater Lake-Klamath Regional Airport (FAA identifier LMT) in Klamath Falls, Oregon. The F-35A will replace the existing F-15 C/D aircraft at the 173rd Fighter Wing, a unit of the Oregon Air National Guard stationed at Kingsley Field Air National Guard Base, located at LMT.

The FAA's Office of Airports (ARP) previously agreed to participate as a CA in the preparation of the Environmental Assessment (EA) for the beddown of F-15 EX Eagle II aircraft at LMT. With the change in aircraft, ARP supports DAF's decision to elevate the analysis and prepare an EIS for this proposal and we agree to be a CA pursuant to 40 CFR §1501.8. As a CA, we agree to assign staff with the goal to help develop a single, comprehensive EIS and, if possible, a joint decision document to meet each agency's distinct obligations under the National Environmental Policy Act of 1969 (NEPA; 42 U.S.C. §§ 4321 - 4374) to support the decision making of both agencies. In addition, FAA's ARP will:

- Participate in the scoping process.
- Upon request by DAF, to the extent practical, support the development of information and analyses, including portions of the EIS concerning issues for which ARP has special expertise, with the following exception:
  - ARP is relying on DAF, as lead agency, to fund major activities or analyses it requests from ARP pursuant to 40 CFR 1501.8(b)(3). Specifically, the modeling and analysis of military and civil aircraft noise impacts for the civil airport location.
- To the extent practicable, support DAF's interdisciplinary review capability pursuant to 40 CFR §1501.8 (b)(4).
- Consult with DAF in development of a schedule, meet the schedule, and elevate, as appropriate, to the senior DAF official, any issues relating to purpose and need, alternatives, or other issues that may affect ARP's ability to meet DAF's schedule.

- Review and provide comments regarding matters for which ARP has jurisdiction by law and special expertise consistent with 40 CFR §1503.2 and specific comments pursuant to 40 CFR §1503.3, as well as ensuring the EIS is legally sufficient for the purposes of relying on the EIS pursuant to 40 CFR §1506.3 associated with ARP's separate but connected action.

As LMT is a civil airport associated with DAF's proposed action, please note where FAA's ARP has jurisdiction by law, ARP will be an "action agency" on behalf of the FAA. Under the Airport and Airway Improvement Act of 1982 (49 U.S.C. 47101) and relevant implementing regulations, ARP has approval authority over an airport sponsor's Airport Layout Plan (ALP). This approval, consistent with provisions under 49 U.S.C 47101 and Section 163 of the 2018 FAA Reauthorization Act, is a major federal action requiring compliance with NEPA. ARP's action, however, is not substantially the same as DAF's action. FAA's ARP needs to ensure that DAF, as the lead agency, prepares an EIS that is sufficient for our independent obligation to comply with NEPA. This includes ensuring that the EIS meets statutory requirements pursuant to NEPA, regulatory requirements pursuant to 40 CFR Parts 1500-1508, and FAA Order 1050.1F *Environmental Impacts: Policies and Procedures* so that ARP may rely on the final EIS and sign a joint decision document.

I trust this is responsive to your request and we look forward to working with your team to develop an achievable schedule and support DAF throughout the NEPA process. If you or your staff have any questions or concerns, the regional point of contact for this is Ilon Logan at [ilon.logan@faa.gov](mailto:ilon.logan@faa.gov).

Sincerely,



WILLIAM C GARRISON  
2023.07.25 03:38:05  
-07'00'

William C. Garrison  
Director, Airports Division, Northwest Mountain Region

Cc: Ilon Logan, Environmental Protection Specialist, Northwest Mountain Region  
Michael Lamprecht, Environmental Protection Specialist, Airport Planning and  
Environmental Division

The sample scoping letter following was distributed to the list below:

Ron Alvarado, State Conservationist, Natural Resources Conservation Services, U.S. Department of Agriculture, 1201 NE Lloyd Blvd, Ste 900, Portland OR 97232  
Jackie Andrew, Assistant Director Forest Planning NEPA, U.S. Forest Service, Pacific Northwest Region, 1220 SW 3rd Ave, Portland OR 97204  
John Barsalou, Director, Crater Lake-Klamath Falls Regional Airport, 6775 Arnold Ave, Klamath Falls OR 97603  
Mika Blain, City of Klamath Falls, Ward 2, 500 Klamath Ave, Klamath Falls OR 97601  
Barry Bushue, State Director, Bureau of Land Management, 1220 SW 3rd Ave, Portland OR 97204  
The Honorable Wlinsvey Campos, Oregon State Legislature, District 28, 900 Court St NE, H-480, Salem OR 97301  
City of Klamath Falls Planning, 500 Klamath Ave, Klamath Falls OR 97601  
Greg Davis, Captain, Klamath County Fire District No. 1, 143 N Broad St, Klamath Falls OR 97601  
Derrick Degroot, Klamath County Board of Commissioners, 305 Main St, Klamath Falls OR 97601  
Ann Farris, Program Manager and THPO, Oregon Department of Environmental Quality Cleanup, Emergency Response, and Hydrogeology Program, Eastern Region, 475 NE Bellevue Dr, Bend OR 97701  
Brandon Fowler, Emergency Manager, Klamath County Public Health, 305 Main St, Klamath Falls OR 97601  
Judy Gordon, Assistant Regional Director, U.S. Fish and Wildlife Service, Pacific Region, 911 NE 11th Ave, Portland OR 97232  
Kevin Heatley, Field Manager, Bureau of Land Management, Klamath Falls Office, 2795 Anderson Ave, #25, Klamath Falls OR 97603  
Wyatt Hefley, Air Tanker Base Manager, U.S. Forest Service, 6300 Summers Ln, Klamath Falls OR 97603  
Dave Henslee, Klamath County Board of Commissioners, 305 Main St, Klamath Falls OR 97601  
Paul Henson, State Supervisor, U.S. Fish and Wildlife Service, Oregon Fish and Wildlife Office, 2600 SE 98th Ave, Ste 100, Portland OR 97266  
Klamath County Cultural Coalition, PO Box 576, Klamath Falls OR 97601  
Klamath County Museums, 1451 Main St, Klamath Falls OR 97601  
Klamath County Public Health, 3314 Vandenberg Ave, Klamath Falls OR 97603  
The Honorable Tina Kotek, Governor, State of Oregon, 900 Court St, Ste 254, Salem OR 97310-4047  
Jennie Land, Area Manager, Bureau of Reclamation, Klamath Basin, 6600 Washburn Way, Klamath Falls OR 97603  
Doug Laye, Manager, Klamath Falls Fish and Wildlife Office, U.S. Department of the Interior, 1936 California Ave, Klamath Falls OR 97601  
The Honorable Dennis Linthicum, Oregon State Senate, District 28, 900 Court St NE, S-311, Salem OR 97301  
Abbie McClung, City of Klamath Falls, Ward 4, 500 Klamath Ave, Klamath Falls OR 97601  
Kelley Minty Morris, Klamath County Board of Commissioners, 305 Main St, Klamath Falls OR 97601  
Randy Moore, Chief, U.S. Forest Service, Klamath Ranger District, 2819 Dahlia St, Ste A, Klamath Falls OR 97601  
Jeremy Morris, Director, Klamath County Public Works, 305 Main St, Klamath Falls OR 97601  
Hunter Moyles, Wildlife Biologist, USDA/APHIS/Wildlife Services - Kingsley Field, 211 Arnold Ave, Kingsley Field, Klamath Falls OR 97603  
Kelsey Mueller Wendt, City of Klamath Falls, Ward 5, 500 Klamath Ave, Klamath Falls OR 97601  
Jeffrey Nettleton, Area Manager, Bureau of Reclamation, Klamath Basin, 6600 Washburn Way, Klamath Falls OR 97603

Erik Nobel, Planning Director, Klamath County, 305 Main St, Government Center, Klamath Falls OR 97601

Oregon Department of Environmental Quality, 803 Main St, Ste 201, Klamath Falls OR 97604-9998

Oregon Department of Fish and Wildlife, Klamath Watershed District Office, 1850 Miller Island Rd, Klamath Falls OR 97603

Oregon Historical Society, 1200 SW Park Ave, Portland OR 97205

Michelle Pirzadeh, Acting Regional Administrator, USEPA Region 10, 1200 Sixth Ave, Ste 155, Seattle WA 98101

Ramona Quinn, Klamath County Public Health, 3314 Vandenberg Rd, Klamath Falls OR 97603

Terra Russo, City of Klamath Falls, Ward 3, 500 Klamath Ave, Klamath Falls OR 97601

Scott Souders, Engineer, Klamath Falls City Development/Planning, 500 Klamath Ave, Klamath Falls OR 97601

Isaak Stapleton, Interim Director, Native Plant Conservation, Oregon Department of Agriculture, 635 Capitol St NE, Salem OR 97301-2532

Phil Studenberg, City of Klamath Falls, Ward 1, 500 Klamath Ave, Klamath Falls OR 97601

Jonathan Teichert, City Manager, City of Klamath Falls, 500 Klamath Ave, Klamath Falls OR 97601

U.S. Army Corps of Engineers, Portland District, PO Box 2946, Portland OR 97208

Iain Vasey, Director of Development Services, City of Klamath Falls, 226 S 5th St, Klamath Falls OR 97601

Fred Way, Forest Supervisor, U.S. Forest Service, Fremont-Winema National Forest Headquarters, 1301 S G St, Lakeview OR 97630

The Honorable Carolyn Westfall, Mayor, City of Klamath Falls, 500 Klamath Ave, Klamath Falls OR 97601

Mark Willrett, Director, Department of Public Works, City of Klamath Falls, 226 S 5th St, Klamath Falls OR 97601





**Sample Agency Letter**

**NATIONAL GUARD BUREAU**  
3501 FETCHET AVENUE JOINT BASE ANDREWS 20762-5157

4 June 2024

NGB/A4FR

Isaak Stapleton  
Interim Director  
Native Plant Conservation  
Oregon Department of Agriculture  
635 Capitol St NE  
Salem OR 97301-2532

Dear Mr. Stapleton

The National Guard Bureau (NGB) pursuant to the National Environmental Policy Act of 1969 (NEPA) (42 United States [U.S.] Code 4321 et seq.), is preparing an Environmental Impact Statement (EIS) that will analyze potential effects to human health and the natural environment, including historic properties and traditional cultural resources, for a proposed undertaking.

The purpose of the Proposed Action is to increase F-35A pilot production in support of the National Defense Strategy. The Proposed Action would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission (Attachments 2, 3). This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. The 173 FW pilots would conduct training from the installation and in existing military training airspace associated with the 173 FW installation (Attachment 4). There would be modifications to the existing military training airspace under this Proposed Action; however, there could be an increase in operations within the airspace. The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

The undertaking is the operation and associated infrastructure construction of one formal training unit (FTU) squadron of F-35A Lightning II (F-35A) aircraft at Kingsley Field Air National Guard Base (ANGB) at the Crater Lake-Klamath Regional Airport (LMT), in Klamath Falls, Oregon (Attachment 1). The squadron would consist of 24 F-35A Primary Aerospace Vehicles Authorized (PAA) and two Backup Aerospace Vehicles Authorized (BAA) and would replace the existing 26 F-15C/D aircraft.

The NGB invites you to attend an in-person public scoping meeting at Crater Lake-Klamath Regional Airport. The materials that will be presented at the open-house meeting will

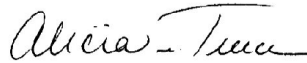
also be available on the website for viewing. The date, time, and address for the public scoping meeting is:

Wednesday June 26, 2024  
5:00–7:00 p.m.  
Crater Lake-Klamath Regional Airport  
3000 Airport Way  
Klamath Falls, Oregon

Further, the NGB requests information or agency-specific preliminary comments that would alleviate or highlight areas of concerns preceding this EIS. Areas of concern may include potential effects to: physical, ecological, social, cultural, and archaeological resources. The NGB also requests any information that your agency may have regarding other proposed, ongoing, or recently completed projects that could create or exacerbate impacts resulting from the Proposed Action.

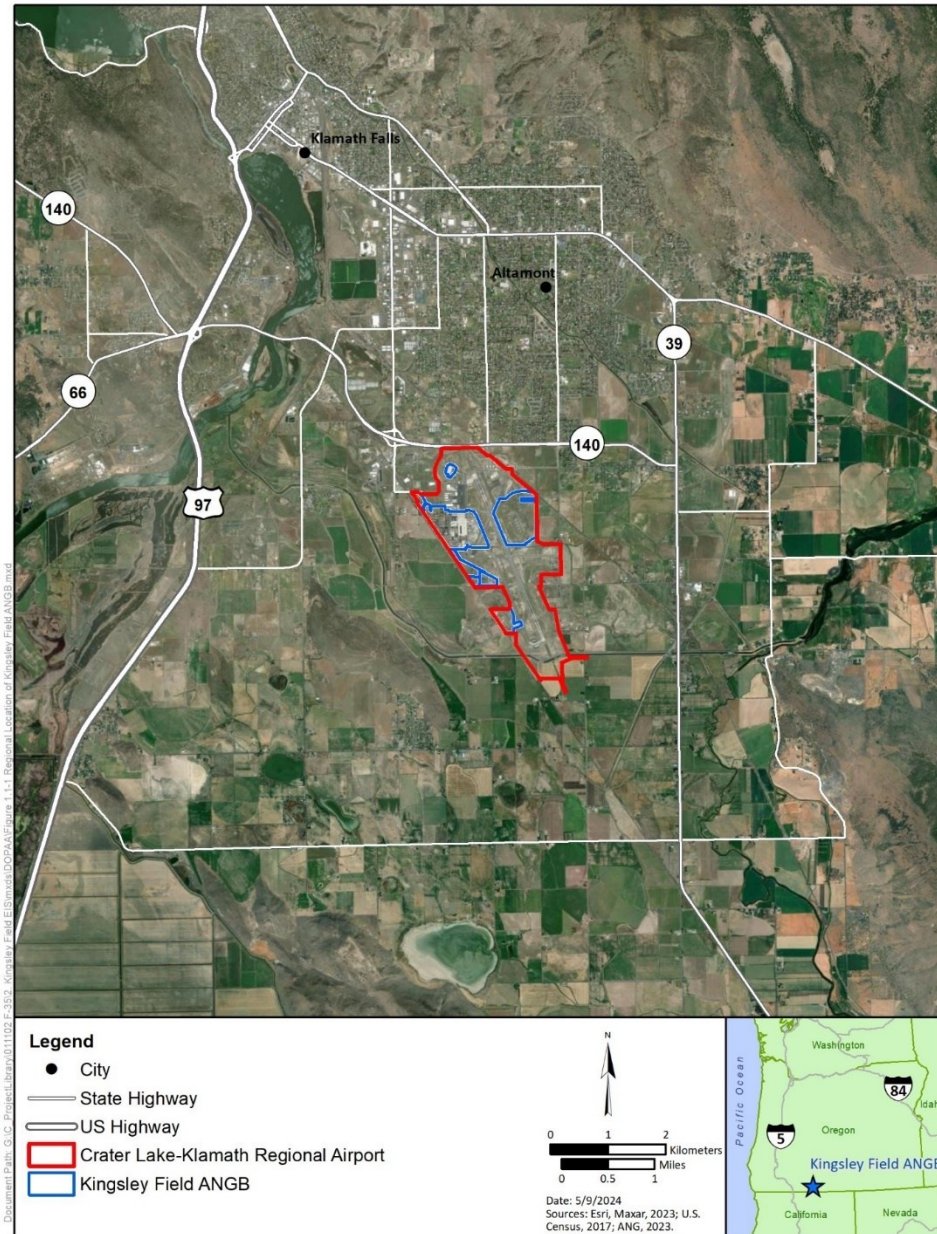
Please respond within thirty (30) days of receipt of this letter to NGB Project Manager, ATTN: F-15EX, F-35A EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil](mailto:NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil) with the subject titled as ATTN: Klamath Falls F-35A EIS. Thank you for your assistance.

Sincerely,

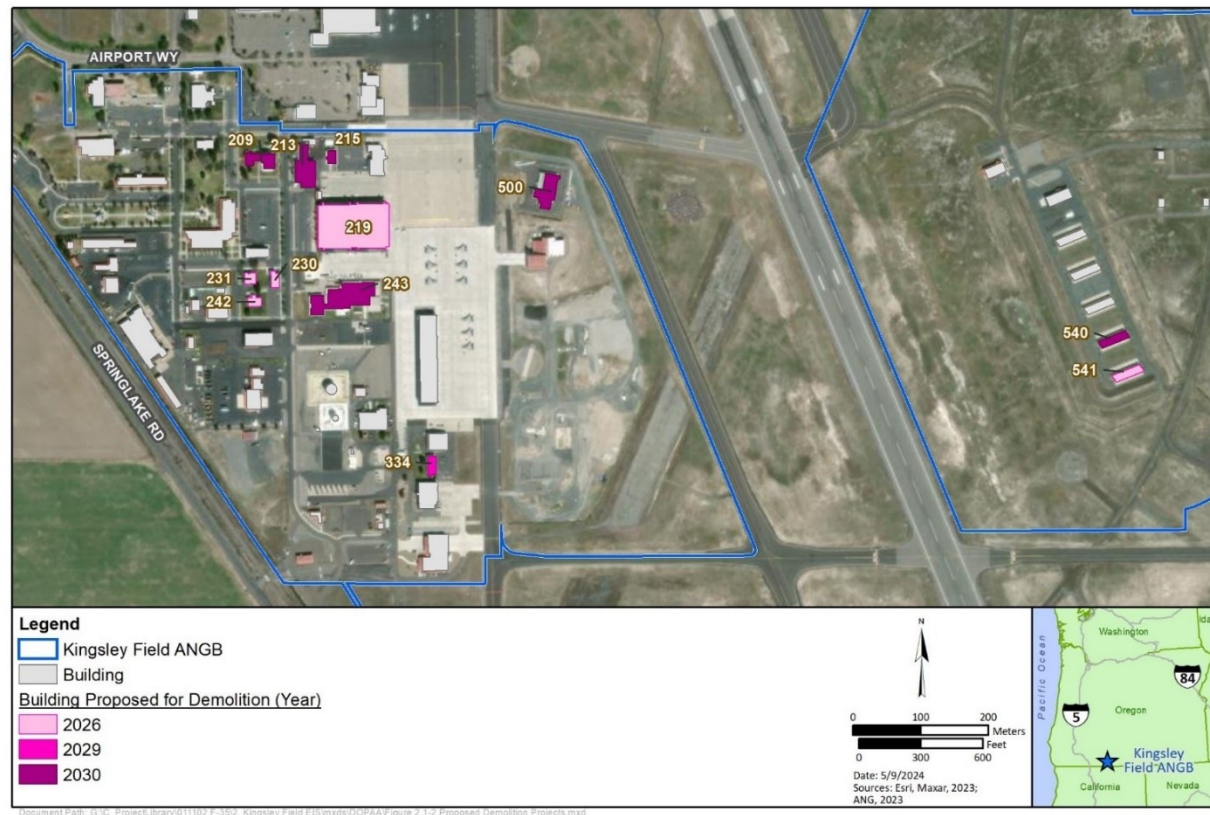


Alicia Treece, NGB/A4FR  
NEPA Program Manager

Attachment 1 - Regional Location Map of Kingsley Field ANGB



Attachment 2 – Proposed Construction, Renovation, and Demolition Project Maps



Proposed Demolition Projects





Attachment 3 – Proposed Construction, Renovation, and Demolition Project Tables

**Summary of Construction and Renovation Projects**

| <i>Project #/<br/>Project<br/>Name.</i>                     | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                        | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|-------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#1 Provide<br/>Training<br/>Classrooms<sup>1</sup></b>   | <b>1a</b>         | Modify existing B209 (existing simulator building) to house flight training classrooms (companion to Project 1b/1c).                                              | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                             | <b>1b</b>         | Construct addition to B209 to include entire category code (i.e., authorized area) for flight training classrooms (companion to Project 1a/1c).                   | Alternate                                    | 2027                         | 3,500                                                            | 3,500                                          | Yes                        | No                               |
|                                                             | <b>1c</b>         | Construct new building containing 4 FMS, 6 MMRT, and contractor support (companion to Project 1a/1b).                                                             | Alternate                                    | 2027                         | 29,583                                                           | 29,583                                         | Yes                        | No                               |
|                                                             | <b>1d</b>         | Construct new building containing flight training classrooms, 4 full motion simulators, 6 MMRT, and contractor support (includes demolition of B242, B230, B231). | Preferred                                    | 2027                         | 38,300                                                           | 23,958                                         | Yes                        | No                               |
| <b>#2 Construct<br/>Echo<br/>Aircraft<br/>Shelter</b>       | <b>2</b>          | Construct 4-bay, 8 aircraft shelter sized to universal fighter standards.                                                                                         | Preferred                                    | 2027                         | 316,000                                                          | 272,000                                        | Yes                        | No                               |
| <b>#3<br/>Operations<br/>Group<br/>Facility<sup>2</sup></b> | <b>3a</b>         | Repair B243 operations group facility to meet F-35 requirements for special access program facilities, office space, and contractor support.                      | Alternate                                    | 2028                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                             | <b>3b</b>         | Construct new operations group facility containing special access program facilities, office space, contractor support (includes demolition of B243).             | Alternate                                    | 2028                         | 25,200                                                           | 0                                              | Yes                        | No                               |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 3 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project<br/>Name.</i>            | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                                                                        | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|----------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
|                                                    | <b>3c</b>         | Construct new operations group facility combined with maintenance facility containing special access program facilities, office space, contractor support, includes demolition of B243 (companion to Project 9d). | Preferred                                    | 2028                         | 25200                                                            | 0                                              | Yes                        | No                               |
| <b>#4 ASE<br/>Facility<sup>3</sup></b>             | <b>4a</b>         | Repair B216 for use as aircraft support equipment facility.                                                                                                                                                       | Alternate                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>4b</b>         | Construct addition to B332 to accommodate increase requirement for ASE facility                                                                                                                                   | Preferred                                    | 2029                         | 1,750                                                            | 0                                              | Yes                        | No                               |
|                                                    | <b>4c</b>         | Construct new B332 for use as ASE facility                                                                                                                                                                        | Alternate                                    | 2029                         | 15,000                                                           | 0                                              | Yes                        | No                               |
|                                                    | <b>4d</b>         | Repair B213 for use as ASE facility                                                                                                                                                                               | Alternate                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
| <b>#5 Engine<br/>Shop<sup>4</sup></b>              | <b>5a</b>         | Repair B213 engine shop for change in engine system and to include wheel/tire facility.                                                                                                                           | Alternate                                    | 2028                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>5b</b>         | Construct new engine shop for change in engine system and to include wheel/tire facility.                                                                                                                         | Alternate                                    | 2028                         | 15,000                                                           | 5,000                                          | Yes                        | No                               |
| <b>#6 Avionics/<br/>Pilot Fitment<br/>Facility</b> | <b>6a</b>         | Repair B331 to accommodate reduced avionics, battery room, and pilot fitment facility.                                                                                                                            | Preferred                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>6b</b>         | Construct new B331 avionics, battery room, and pilot fitment facility.                                                                                                                                            | Alternate                                    | 2028                         | 12,000                                                           | 0                                              | Yes                        | No                               |
| <b>#7 Loading<br/>Dock</b>                         | <b>7</b>          | Repair loading dock for larger load leveler and better space utilization.                                                                                                                                         | Preferred                                    | 2026                         | 50,000                                                           | 4,000                                          | Yes                        | No                               |
| <b>#8<br/>Temporary<br/>LAMS<br/>Shelters</b>      | <b>8</b>          | Install temporary LAMS shelters for aircraft on existing pavements.                                                                                                                                               | Preferred                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 3 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project<br/>Name.</i>                                                  | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                               | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|------------------------------------------------------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#9<br/>Maintenance<br/>Hangar and<br/>Shops<sup>5</sup></b>                           | <b>9a</b>         | Repair and reconfigure B219 maintenance hangar and shops to include improvements for seismic, light protection systems, and fire protection systems.                     | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                                                          | <b>9b</b>         | Construct new 6-aircraft maintenance hangar (Phase 1), includes demolition of east bay B219 (integrates with 9c Phase 2).                                                | Alternate                                    | 2028                         | 50,700                                                           |                                                | Yes                        | No                               |
|                                                                                          | <b>9c</b>         | Construct new aircraft maintenance shops (Phase 2), includes demolition of west bay B219 (integrates with 9b Phase 1).                                                   | Alternate                                    | 2026                         | 36,800                                                           |                                                | Yes                        | No                               |
|                                                                                          | <b>9d</b>         | Construct new combined 6-aircraft maintenance hangar, aircraft maintenance shops, and AMU. Includes demolition of B219.                                                  | Preferred                                    | 2027                         | 90,000                                                           |                                                | Yes                        | No                               |
| <b>#10<br/>Munitions<br/>Maintenance<br/>and<br/>Inspection<br/>Facility<sup>6</sup></b> | <b>10a</b>        | Repair existing maintenance and inspection facility to meet SCIF needs and update systems.                                                                               | Preferred                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                                                          | <b>10b</b>        | Construct new munitions maintenance and inspection facility for 1.1 (mass detonation) and 1.2 (fragmentation) explosives operations to meet minimum explosive standards. | Preferred                                    | 2026                         | 3,900                                                            | 3,900                                          | Yes                        | No                               |
| <b>#11<br/>Munitions<br/>Trailer</b>                                                     | <b>11</b>         | Construct new pull through maintenance facility for large trailers.                                                                                                      | Preferred                                    | 2026                         | 1,500                                                            |                                                | Yes                        | No                               |
| <b>#12<br/>Munitions<br/>Assembly<br/>Pad</b>                                            | <b>12</b>         | Construct new munitions assembly pad and inert storage facility.                                                                                                         | Preferred                                    | 2030                         | 20,000                                                           | 20,000                                         | Yes                        | No                               |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 3 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project Name.</i>          | <i>Project ID</i> | <i>Project Description</i>                                                                                                   | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|----------------------------------------------|-------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#13 Weapons Facility<sup>7</sup></b>      | <b>13a</b>        | Repair B500 weapons release facility to meet standards for F-35 and safety and seismic upgrades.                             | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                              | <b>13b</b>        | Construct new hangar bay for weapons load training and light protection system parking spot                                  | Preferred                                    | 2027                         | 15,000                                                           | 15,000                                         | Yes                        | No                               |
|                                              | <b>13c</b>        | Construct new facility attached to weapons load training bay including all shops for associated AMU AFSC's (currently AMXS). | Alternate                                    | 2027                         | 22,400                                                           | 22,400                                         | Yes                        | No                               |
|                                              | <b>13d</b>        | Construct new weapons release facility attached to weapons load training facility.                                           | Preferred                                    | 2027                         | 18,000                                                           | 18,000                                         | Yes                        | No                               |
| <b>#14 Fuel Cell Bay<sup>8</sup></b>         | <b>14</b>         | Construct additional fuel cell maintenance bay onto existing B333 fuel cell bay, and light protection system parking spot    | Preferred                                    | 2029                         | 6,800                                                            | 0                                              | Yes                        | No                               |
| <b>#15 Taxiway A</b>                         | <b>15</b>         | Repair Taxiway A access ramp to B400                                                                                         | Preferred                                    | 2026                         | 8,500                                                            | 0                                              | Yes                        | No                               |
| <b>#16 LRS Covered Parking</b>               | <b>16</b>         | Construct LRS covered parking for LRS primary vehicles.                                                                      | Preferred                                    | 2030                         | 2,000                                                            | 2,000                                          | Yes                        | Yes                              |
| <b>#17 Civil Engineering Covered Parking</b> | <b>17</b>         | Construct civil engineering covered parking for snow plowing vehicles.                                                       | Preferred                                    | 2030                         | 4,000                                                            | 4,000                                          | Yes                        | Yes                              |
| <b>#18 Troop Camp</b>                        | <b>18a</b>        | Repair existing B208 troop camp.                                                                                             | Preferred                                    | 2040                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                              | <b>18b</b>        | Construct new troop camp.                                                                                                    | Alternate                                    | 2040                         | 17,489                                                           | 0                                              | Yes                        | Yes                              |
| <b>#19 Services Facility</b>                 | <b>19a</b>        | Repair B209 services facility.                                                                                               | Preferred                                    | 2035                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                              | <b>19b</b>        | Construct new services facility.                                                                                             | Alternate                                    | 2035                         | 2,950                                                            | 0                                              | Yes                        | Yes                              |
| <b>#20 Base Exchange/Starbase</b>            | <b>20a</b>        | Repair B302 base exchange and starbase facility.                                                                             | Preferred                                    | 2035                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                              | <b>20b</b>        | Construct new base exchange and starbase facility.                                                                           | Alternate                                    | 2035                         | 7,860                                                            | 0                                              | Yes                        | Yes                              |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 3 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project Name.</i>        | <i>Project ID</i> | <i>Project Description</i>                                                                       | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|--------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#21 Civil<br/>Engineering<br/>Shops</b> | <b>21a</b>        | Construct new civil engineering combined facility.                                               | Preferred                                    | 2030                         | 30,000                                                           | 25,600                                         | Yes                        | Yes                              |
|                                            | <b>21b</b>        | Repair B220 civil engineering shops.                                                             | Alternate                                    | 2030                         |                                                                  |                                                | Yes                        | Yes                              |
|                                            | <b>21c</b>        | Repair B221 civil engineering administration.                                                    | Alternate                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                            | <b>21d</b>        | Repair B234 civil engineering emergency management and storage.                                  | Alternate                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
| <b>#22 Dining<br/>Facility</b>             | <b>22a</b>        | Repair B130 dining facility.                                                                     | Preferred                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                            | <b>22b</b>        | Construct new dining facility.                                                                   | Alternate                                    | 2030                         | 10,800                                                           | 0                                              | Yes                        | Yes                              |
| <b>#23 C-17<br/>Ramp</b>                   | <b>23</b>         | Construct C-17 Ramp on the east side of airfield for C-17 movement per the Oregon Cascadia Zone. | Preferred                                    | 2026                         | 300,000                                                          | 300,000                                        | Yes                        | Yes                              |

*Notes:* <sup>1</sup>Project 1 would require the choice of Project 1a, 1b, 1c combined or Project 1d alone. Project 1d would require the demolition of B242, B230, and B231.

<sup>2</sup>Project 3 would require the choice between Project 3a, 3b, or 3c. Project 3c requires selection of Project 9d.

<sup>3</sup>Project 4 would require the choice between Project 4a, 4b, 4c, or 4d.

<sup>4</sup>Project 5a/5b would not be implemented if the preferred Project 9d is implemented. Implementation of Project 5a or 5b required that Project 9a be implemented.

<sup>5</sup>Project 9 would require the choice of Project 9a, Project 9b/9c, or Project 9d. Implementation of the Project 9c or 9d options would eliminate the need for Project 5a/5b.

Project 9d is the companion to Project 3c. Project 9d would eliminate the need for Project 13c.

<sup>6</sup>Project 10b would require demolition of B540 and B541.

<sup>7</sup>Project 13 would require the choice of the following: 13a/13b, 13b/c, or 13 b/d. Project 13c would not be compatible with 9d.

<sup>8</sup>Project 14 would require demolition of B334.

*Legend:* AMU = aircraft maintenance unit; AFSC = air force specialty code; AMXS = aircraft maintenance squadron; ASE = aircraft support equipment; B = Building, FMS = full motion simulator; LAMS = large area maintenance shelters; LRS = logistics readiness squadron; MMRT = mobile mission rehearsal trainer; PFF = pilot fitment facility; SCIF = sensitive compartmented information facilities; SF = square feet

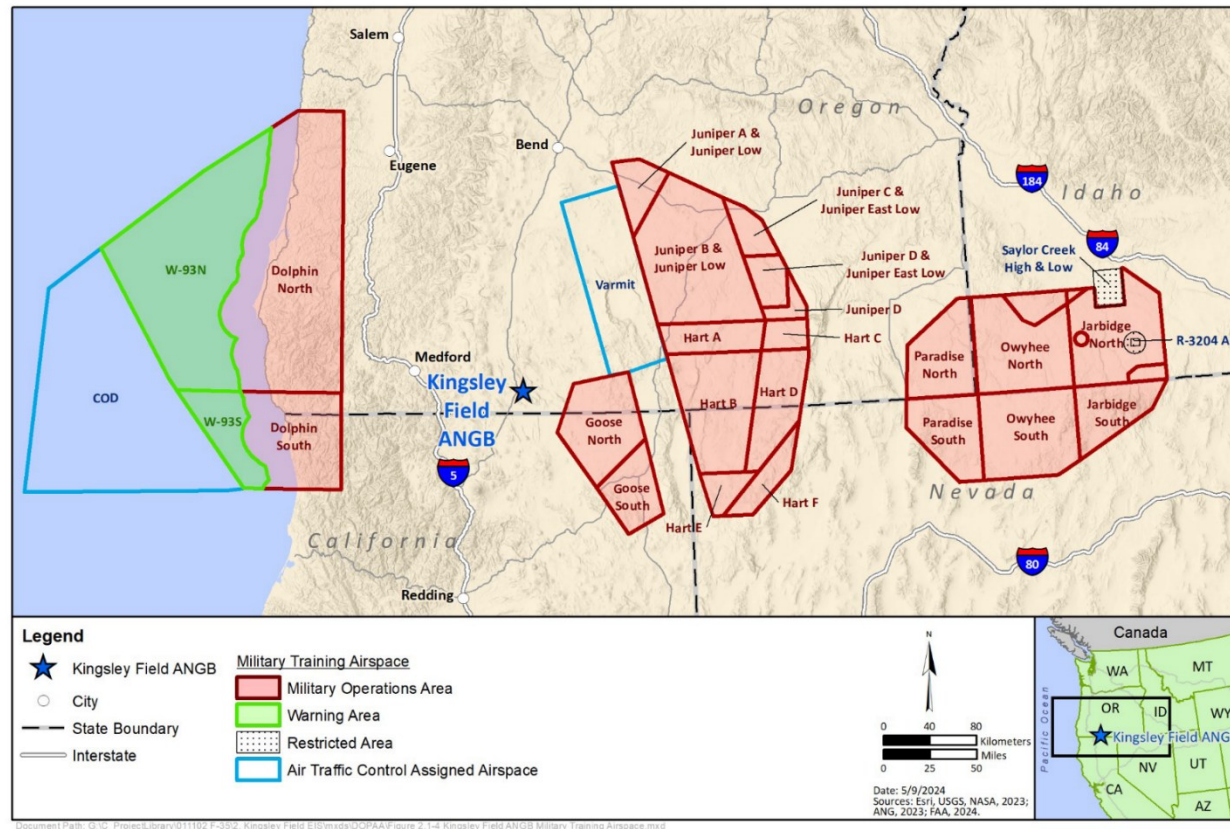
Attachment 3 – Proposed Construction, Renovation, and Demolition Project Tables

**Proposed Demolition Projects**

| <i>Building Number</i>          | <i>Total Area of Demolition (SF)</i> | <i>Year Building was Constructed</i> | <i>Year Proposed for Demolition</i> |
|---------------------------------|--------------------------------------|--------------------------------------|-------------------------------------|
| B209                            | 8,717                                | 1989                                 | 2030                                |
| B213                            | 15,271                               | 1959                                 | 2030                                |
| B215                            | 2,400                                | 1959                                 | 2030                                |
| B219                            | 83,305                               | 1959                                 | 2026                                |
| B230                            | 2,926                                | 1959                                 | 2026                                |
| B231                            | 2,916                                | 1958                                 | 2026                                |
| B242                            | 2,830                                | 1961                                 | 2026                                |
| B243                            | 32,570                               | 1987                                 | 2030                                |
| B334                            | 3,772                                | 1987                                 | 2029                                |
| B500                            | 12,112                               | 1957                                 | 2030                                |
| B540                            | 5,450                                | 1959                                 | 2030                                |
| B541                            | 5,450                                | 1959                                 | 2026                                |
| <b>Total SF of Demolition =</b> | <b>177,719</b>                       |                                      |                                     |

*Legend:* B = Building; SF = square feet.

Attachment 4 – Kingsley Field ANGB Military Training Airspace Map



**Kingsley Field ANGB Military Training Airspace**



**NATIONAL GUARD BUREAU**  
3501 FETCHET AVENUE JOINT BASE ANDREWS 20762-5157

21 November 2025

NGB/A4FR  
Shepperd Hall  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

Jennie Land  
Deputy Field Supervisor  
Klamath Falls Fish and Wildlife Office  
1936 California Avenue  
Klamath Falls, OR 97601

SUBJECT: Request for Initiation of Informal Consultation Under Section 7(a)(2) of the  
Endangered Species Act for Basing F-35A Lightning II Formal Training Unit at  
Kingsley Field Air National Guard Base Klamath Falls, Oregon

Dear Deputy Field Supervisor Snider,

The National Guard Bureau (NGB) is requesting initiation of informal consultation under section 7(a)(2) of the Endangered Species Act (ESA), for the proposed basing of the F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon. The NGB and the Department of the Air Force (DAF) propose to maintain the combat capability of the Air National Guard (ANG) by establishing this formal training unit (FTU) of F-35A Lightning II, including the construction of associated infrastructure.

The NGB and the DAF have determined that the Proposed Action at Kingsley Field ANGB would have no effect on federally listed species found within the installation. For the associated airspace, the NGB and DAF have determined that the Proposed Action may affect, but is not likely to adversely affect multiple federally listed birds, mammals, and terrestrial reptiles (please refer to the list of species located in Table 1 having a "not likely to adversely affect" determination). A project description and our supporting analysis are provided below. We request your written concurrence if you agree with our determinations.

Kingsley Field ANGB

The NGB and the DAF have determined that the Proposed Action will have no effect on federally listed marine species, invertebrates, plants, and fish (please refer to the list of species in Table 1 having a "no effect" determination). As confirmed within the *Final Integrated Natural Resources Management Plan* (NGB 2024), *Final Flora and Fauna Survey* (NGB 2023), and *Final Report Threatened and Endangered Species Surveys and Management Plan* (173 FW 2024), federally listed marine species, invertebrates, plants, and fish would not be impacted by construction, as their habitats do not overlap the project construction footprint. Additionally, no critical habitat occurs within the base boundaries. Although the Applegate's milk-vetch (*Astragalus applegatei*) currently occurs on base, areas of occurrence are known and monitored (173 FW 2024) and the construction footprint would not overlap with these areas. The shortnose

sucker (*Chasmistes brevirostris*) and Lost River sucker (*Deltistes luxatus*) occurred historically on Kingsley Field ANGB, but habitat for these species no longer occurs on the base (NGB 2024). Therefore, the Proposed Action would have no effect on Applegate’s milk-vetch, short-nose sucker, and Lost River sucker, and these species are not carried forward for consultation.

Airspace

For the Proposed Action, established military training airspace configurations, as previously assessed within the *Environmental Impact Statement for Proposed Establishment and Modification of Oregon Military Training Airspace* (NGB 2017), are not proposed to change. The proposed activities in the airspace would not result in new ground disturbance, ordnance delivery and chaff and flare use would not exceed current levels and would occur in locations already used and authorized for those purposes, and underwater species would not experience measurable changes in noise levels. From this previous analysis, NGB and DAF have determined that the Proposed Action would have no effect on the critical habitats that occur below the airspace (please refer to list of critical habitats in Table 1). Brief and intermittent noise effects to individuals of listed species, as described below, would not affect the physical attributes of any critical habitat below the airspace. Therefore, the critical habitats that occur under the airspace would experience no effect from the Proposed Action. However, since the federally listed birds, mammals, and terrestrial reptiles listed in Table 1 may experience temporary and brief noise disturbances from the establishment of the F-35A FTU, airfield and airspace operations under the Proposed Action may affect, but are not likely to adversely affect the threatened and endangered bird, mammal, and terrestrial reptile species listed in Table 1.

**Table 1 Federal and State Listed Species Potentially Occurring on Kingsley Field ANGB and Under the Airspace**

| <i>Common Name</i>     | <i>Scientific Name</i>            | <i>Status</i> | <i>Potential Occurrence on Kingsley Field ANGB</i> | <i>Potential Occurrence Under the Airspace</i> | <i>Species Effects Determination</i> | <i>Critical Habitat Effects Determination</i> |
|------------------------|-----------------------------------|---------------|----------------------------------------------------|------------------------------------------------|--------------------------------------|-----------------------------------------------|
| <b>Birds</b>           |                                   |               |                                                    |                                                |                                      |                                               |
| Western snowy plover   | <i>Charadrius nivosus</i>         | ST, T         | -                                                  | P                                              | NLAA                                 | NE                                            |
| California Condor      | <i>Gymnogyps californianus</i>    | EX            | -                                                  | P                                              | NLAA                                 | NE                                            |
| Yellow-billed cuckoo   | <i>Coccyzus americanus</i>        | T             | P                                                  | P                                              | NLAA                                 | -                                             |
| Northern spotted owl   | <i>Strix occidentalis caurina</i> | ST, T         | -                                                  | P                                              | NLAA                                 | NE                                            |
| Hawaiian petrel        | <i>Pterodroma sandwichensis</i>   | E             | -                                                  | P                                              | NLAA                                 | -                                             |
| Marbled murrelet       | <i>Brachyramphus marmoratus</i>   | SE, T         | -                                                  | P                                              | NLAA                                 | NE                                            |
| Short-tailed albatross | <i>Phoebastria albatrus</i>       | SE, E         | -                                                  | P                                              | NLAA                                 | -                                             |



| <i>Common Name</i>                                   | <i>Scientific Name</i>               | <i>Status</i> | <i>Potential<br/>Occurrence<br/>on Kingsley<br/>Field<br/>ANGB</i> | <i>Potential<br/>Occurrence<br/>Under the<br/>Airspace</i> | <i>Species<br/>Effects<br/>Determination</i> | <i>Critical<br/>Habitat<br/>Effects<br/>Determination</i> |
|------------------------------------------------------|--------------------------------------|---------------|--------------------------------------------------------------------|------------------------------------------------------------|----------------------------------------------|-----------------------------------------------------------|
| <b>Fish</b>                                          |                                      |               |                                                                    |                                                            |                                              |                                                           |
| Shortnose sucker                                     | <i>Chasmistes brevirostris</i>       | SE, E         | P                                                                  | P                                                          | NE                                           | NE                                                        |
| Lost River sucker                                    | <i>Deltistes luxatus</i>             | SE, E         | P                                                                  | P                                                          | NE                                           | NE                                                        |
| Bull trout                                           | <i>Salvelinus confluentus</i>        | T             | -                                                                  | P                                                          | NE                                           | NE                                                        |
| Hutton Tui chub                                      | <i>Gila bicolor</i> ssp.             | ST, T         | -                                                                  | P                                                          | NE                                           | -                                                         |
| Tidewater goby                                       | <i>Eucyclogobius newberryi</i>       | E             | -                                                                  | P                                                          | NE                                           | NE                                                        |
| Warner sucker                                        | <i>Catostomus warnerensis</i>        | ST, T         | -                                                                  | P                                                          | NE                                           | NE                                                        |
| Desert dace                                          | <i>Eremichthys across</i>            | T             | -                                                                  | P                                                          | NE                                           | NE                                                        |
| Lahontan cutthroat trout                             | <i>Oncorhynchus clarkia henshawi</i> | ST, T         | -                                                                  | P                                                          | NE                                           | -                                                         |
| <b>Reptiles</b>                                      |                                      |               |                                                                    |                                                            |                                              |                                                           |
| Leatherback sea turtle                               | <i>Dermochelys coriacea</i>          | SE, E         | -                                                                  | P                                                          | NE                                           | -                                                         |
| Loggerhead sea turtle                                | <i>Caretta caretta</i>               | ST, E         | -                                                                  | P                                                          | NE                                           | -                                                         |
| Northwestern pond turtle                             | <i>Actinemys marmorata</i>           | PT            | -                                                                  | P                                                          | NLAA                                         | -                                                         |
| Olive ridley sea turtle                              | <i>Lepidochelys olivacea</i>         | ST, T         | -                                                                  | P                                                          | NE                                           | -                                                         |
| <b>Mammals</b>                                       |                                      |               |                                                                    |                                                            |                                              |                                                           |
| Gray wolf                                            | <i>Canis lupus</i>                   | E             | P                                                                  | P                                                          | NLAA                                         | -                                                         |
| North American wolverine                             | <i>Gulo gulo luscus</i>              | ST, T         | P                                                                  | P                                                          | NLAA                                         | NE                                                        |
| Pacific marten (Coastal Distinct Population Segment) | <i>Martes caurina</i>                | T             | -                                                                  | P                                                          | NLAA                                         | NE                                                        |
| <b>Snails</b>                                        |                                      |               |                                                                    |                                                            |                                              |                                                           |
| Bruncau hot springsnail                              | <i>Pyrgulopsis bruneauensis</i>      | E             | -                                                                  | P                                                          | NE                                           | -                                                         |
| <b>Insects</b>                                       |                                      |               |                                                                    |                                                            |                                              |                                                           |
| Monarch butterfly                                    | <i>Danaus plexippus</i>              | PT            | P                                                                  | P                                                          | NE                                           | -                                                         |
| Suckley's Cuckoo Bumble Bee                          | <i>Bombus suckeyi</i>                | PE            | P                                                                  | P                                                          |                                              |                                                           |
| Franklin's bumble bee                                | <i>Bombus franklini</i>              | E             | -                                                                  | P                                                          | NE                                           | -                                                         |
| Oregon silverspot butterfly                          | <i>Speyeria zerene hippolyta</i>     | T             | -                                                                  | P                                                          | NE                                           | NE                                                        |

| <i>Common Name</i>         | <i>Scientific Name</i>                          | <i>Status</i> | <i>Potential<br/>Occurrence<br/>on Kingsley<br/>Field<br/>ANGB</i> | <i>Potential<br/>Occurrence<br/>Under the<br/>Airspace</i> | <i>Species<br/>Effects<br/>Determination</i> | <i>Critical<br/>Habitat<br/>Effects<br/>Determination</i> |
|----------------------------|-------------------------------------------------|---------------|--------------------------------------------------------------------|------------------------------------------------------------|----------------------------------------------|-----------------------------------------------------------|
| <b>Crustaceans</b>         |                                                 |               |                                                                    |                                                            |                                              |                                                           |
| Conservancy fairy shrimp   | <i>Branchinecta conservatio</i>                 | E             | -                                                                  | P                                                          | NE                                           | -                                                         |
| Shasta crayfish            | <i>Pacifastacus fortis</i>                      | E             | -                                                                  | P                                                          | NE                                           | -                                                         |
| Vernal pool fairy shrimp   | <i>Branchinecta lynchi</i>                      | T             | -                                                                  | P                                                          | NE                                           | -                                                         |
| Vernal pool tadpole shrimp | <i>Lepidurus packardii</i>                      | E             | -                                                                  | P                                                          | NE                                           | -                                                         |
| <b>Plants</b>              |                                                 |               |                                                                    |                                                            |                                              |                                                           |
| Applegate's milk-vetch     | <i>Astragalus applegatei</i>                    | SE, E         | O                                                                  | -                                                          | NE                                           | -                                                         |
| Whitebark pine             | <i>Pinus albicaulis</i>                         | ST, T         | -                                                                  | P                                                          | NE                                           | -                                                         |
| Cook's lomatium            | <i>Lomatium cookii</i>                          | SE, E         | -                                                                  | P                                                          | NE                                           | NE                                                        |
| Gentner's fritillary       | <i>Fritillaria gentneri</i>                     | SE, E         | -                                                                  | P                                                          | NE                                           | -                                                         |
| Greene's tuctoria          | <i>Tuctoria greenii</i>                         | E             | -                                                                  | P                                                          | NE                                           | -                                                         |
| Kincaid's lupine           | <i>Lupinus sulphureus</i> ssp. <i>kincaidii</i> | ST, T         | -                                                                  | P                                                          | NE                                           | -                                                         |
| McDonald's rock-cress      | <i>Arabis macdonaldiana</i>                     | SE, E         | -                                                                  | P                                                          | NE                                           | -                                                         |
| Slender Orcutt grass       | <i>Orcuttia tenuis</i>                          | T             | -                                                                  | P                                                          | NE                                           | -                                                         |
| Slickspot peppergrass      | <i>Lepidium papilliferum</i>                    | T             | -                                                                  | P                                                          | NE                                           | NE                                                        |
| Western lily               | <i>Lilium occidentale</i>                       | SE, E         | -                                                                  | P                                                          | NE                                           | -                                                         |
| Sand dune phacelia         | <i>Phacelia argentea</i>                        | ST, T         | -                                                                  | -                                                          | -                                            | NE                                                        |

*Legend:* ANGB = Air National Guard Base; E = Federally Endangered; EX = Experimental Population; T = Federally Threatened; PT = Proposed Federally Threatened; PE = Proposed Federally Endangered; SE = State Endangered; ST = State Threatened; O = Observed; P = Potential; NLAA = Not Likely to Adversely Affect; NE = No Effect  
*Source:* NGB 2017, 2023, 2024; 173 FW 2024 ODFW 2024; Oregon Department of Agriculture 2024; USFWS 2025.

## Proposed Action

### Kingsley Field ANGB

The proposal is the beddown, operation, and associated infrastructure construction of one FTU squadron of F-35A Lightning II (F-35A) aircraft at Kingsley Field ANGB at the Crater Lake-Klamath Regional Airport (LMT), in Klamath Falls, Oregon (Attachments 1–5). A description of the construction projects and their locations are found in Attachments 2 and 3. The squadron would consist of up to 24 F-35A Primary Aerospace Vehicles Authorized (PAA) and 2 Backup Aerospace Vehicles Authorized (BAA) and would replace the existing 26 F-15C/D aircraft. PAA is the number of aircraft authorized to a unit in order to perform its operational

mission, while BAA is the aircraft that would be used only if one of the PAA aircraft is out of commission.

To accommodate the proposed F-35A beddown, or retention of the F-15C/D aircraft, construction of new facilities, and/or renovation of existing facilities, and some facility demolition would be necessary. All construction would be located within the base and/or airport boundaries (Attachment 2). The beddown process would occur in phases associated with the manufacture and delivery of the F-35A aircraft. Delivery of the first aircraft to Kingsley Field would likely occur in Fiscal Year (FY) 2027. Delivery of the final aircraft would be expected in FY 2029, at which time the full complement of up to 24 PAA (plus 2 BAA) F-35A aircraft would be based at Kingsley Field. Much of the proposed construction and renovation would occur before the first new aircraft would arrive but may continue after the first aircraft arrives. The duration of construction is dependent upon the complexity and breadth of development needed to support the beddown. Approximately 30 additional contracted personnel would provide support in security, system administration, training, and simulator operations. Airfield Operations

To provide the training needed to ensure combat readiness, F-35A aircrews would conduct operations in two types of areas: (1) an airfield associated with an installation, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A would use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures.

The annual flying program for the F-35A is 250 hours per aircraft. Though each aircraft may not achieve the full amount of annual flying hours, the analysis evaluates the full 250 hours per aircraft. Thus, with up to 24 PAA proposed for the F-35A, the total flying hour program for the 173 FW would be 6,000 hours annually. The number of sorties conducted depends on the training mission set and the average sortie duration for the 173 FW (Table 2), which depends upon the 173 FW's proximity to their training airspace.

**Table 2 Current and Estimated Proposed Annual Airspace Sorties**

| <i>Aircraft Type</i> | <i>Existing Average Sortie Duration (hours)</i> | <i>Total Aircraft Sorties</i> |
|----------------------|-------------------------------------------------|-------------------------------|
| F-15C/D              | 1.3                                             | 3,194                         |
| F-35A                | 1.3                                             | 4,585                         |

*Military Training Airspace*

Pilots operating the aircraft would conduct training from the base and in existing military training airspace associated with the 173d Fighter Wing (173 FW). Training operations would take place within existing military airspace and military training ranges; however, there would likely be an increase in the number of airspace operations.

The existing training airspace utilized by the 173 FW includes, but is not limited to Military Operations Areas (MOAs) and associated Air Traffic Control Assigned Airspace (ATCAA), as well as Warning Areas (W-) and Restricted Areas (R-) (Attachment 4). Under the Proposed Action, there are no proposed changes to the configurations of any military training airspace. The F-35A aircraft would use the same training airspace that the current aircraft use. It is expected that the F-35A would use a similar altitude profile as the F-15C/D in training;

however, the majority of F-35A training would occur at altitudes above 20,000 feet mean sea level (MSL) (Table 4). The use of low altitudes for air-to-air training would be expected to decrease as most training operations would emphasize survivability against surface-to-air threats, which requires increased use of high-altitude airspace and increased standoff distances.

Table 3 describes the existing training airspace managed and/or utilized by the 173 FW. See Attachment 4 for a depiction of the airspace. The 173 FW utilizes over-land and over-water military training airspace to meet training requirements. There are also ATCAAs overlying the Juniper/Hart, Dolphin, and Goose MOAs with altitudes spanning from 18,000 feet MSL up to 51,000 feet MSL.

**Table 3 173 FW Military Training Airspace**

| <b>Military Training Airspace</b>                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Goose North MOA</li> <li>• Goose North ATCAA</li> <li>• Goose South MOA</li> <li>• Goose South ATCAA</li> <li>• Juniper Low MOA</li> <li>• Juniper East Low MOA</li> <li>• Juniper A/B/C/D MOA</li> <li>• Juniper A/B/C/D ATCAA</li> <li>• Hart A/B/C/D/E/F MOA</li> <li>• Hart A/B/C/D/E/F ATCAA</li> </ul> | <ul style="list-style-type: none"> <li>• Varnit Air Refueling ATCAA</li> <li>• Dolphin N/S MOA</li> <li>• Dolphin N/S ATCAA</li> <li>• W-93 N/S</li> <li>• COD ATCAA</li> <li>• Paradise N/S MOA</li> <li>• Owyhee N/S MOA</li> <li>• Jarbidge N/S MOA</li> <li>• Saylor Creek High/Low</li> <li>• R-3204 A-C</li> </ul> |

*Legend:* ATCAA = Air Traffic Control Assigned Airspace; MOA = Military Operations Area; R- = Restricted Area; W- = Warning Area.

Chaff and flares are the principal defensive countermeasures dispensed by military aircraft to evade attack by enemy air defense systems. Although the F-35A's stealth features substantially reduce its detectability, pilots must train to employ defensive countermeasures.

Chaff and flare use is authorized in ANG-managed airspace in Oregon. The Oregon ANG would continue to implement a minimum release altitude of 5,000 feet above ground level (AGL) for flares deployed in ANG-managed Oregon airspace (NGB 2017). The 173 FW would continue to adhere to local operating procedures for chaff and flare release. The allocation and use of defensive countermeasures is not expected to change from the current usage (NGB 2017). The 173 FW would continue to receive the same allocation of chaff and flares that they currently receive. They would be expected to be used at the same rates in the same places, subject to the same restrictions that exist now.

Air-to-air ordnance is used to destroy other aircraft and includes air-to-air missiles (AIM-120 and AIM-9) and the cannon. The F-15C/D has 20-millimeter (mm) cannon systems, and the F-35A cannon is 25mm. Air-to-ground ordnance is used for ground-based targets. The F-15C/D does not carry any air-to-ground ordnance since it does not have an air-to-ground mission. In support of air-to-air training missions, the F-15C/D carries training missiles and instrument pods (which help record the aircraft's position for training purposes). These training aids do not release from the aircraft.

No live air-to-ground munitions would be assembled, stored, or loaded at Kingsley Field ANGB. Inert air-to-ground munitions would be used for munitions assembly and load training. Munitions for the F-35A would be similar in type and amount to that of the F-15C/D. Aircrew air-to-ground training would be primarily accomplished via aircraft training mode (i.e., air-to-ground ordnance is neither physically loaded nor released from the aircraft), simulator training events, or during deployments to various training locations such as the Saylor Creek Bombing Range that support live/inert air-to-ground weapons release events. On seldom occasions, inert ordnance would be loaded on aircraft and released in local approved restricted areas. Regulations on safety for storage, handling, and use of ordnance would all remain as they are now.

### **Analysis of Effects on Threatened and Endangered Species**

#### Kingsley Field ANGB

Construction from the Proposed Action would occur in previously disturbed and developed areas on Kingsley Field ANGB, which do not provide native wildlife habitat that would support the federally listed species in Table 1 (Attachment 2). Therefore, construction would have no effect on threatened and endangered species (NGB 2024).

Operational noise levels at Kingsley Field ANGB would be expected to increase from baseline with the conversion to the F-35A aircraft from the existing F-15C/D (Attachment 5). The Proposed Action would result in an increase in the size of the Day-Night Average Sound Level (DNL) contours in all directions from the base as a result of the proposed increase in operations and the higher noise levels of the F-35A as compared to the F-15C/D. An additional 2,329 acres of land off the airport property would be exposed to DNL greater than 65 decibels (dB) (Attachment 5). The off-airport acreage would be composed of 2,788 acres exposed to 65 to 70 dB DNL (an increase of 1,229 acres), 1,192 acres exposed to 70 to 75 dB DNL (an increase of 663 acres), 435 acres exposed to 75 to 80 dB DNL (an increase of 346 acres), 90 acres exposed to 80 to 85 dB DNL (an increase of 88 acres), and 2 acres exposed to greater than 85 dB DNL (an increase of 2 acres) (Attachment 5). The majority of this area is residential, commercial, industrial, and agricultural lands with little to no native wildlife habitat. The yellow-billed cuckoo (*Coccyzus americanus*), the gray wolf (*Canis lupus*), and the North American wolverine (*Gulo gulo luscus*) (Table 1) have not been recorded on Kingsley Field ANGB and are all highly unlikely to occur on the base due to habitat selection and species distribution (NGB 2024). The changes in operational noise on Kingsley Field ANGB would not be expected to significantly affect federally listed species in the area because of the absence of suitable habitat. Additionally, species on and near the base are likely accustomed to elevated noise levels associated with aircraft and military operations as well as other noise associated with commercial, industrial, and agricultural operations. Small increases in noise levels would not result in significant negative effects to federally listed species that occur near the base (Table 1).

Since the number of airfield operations would increase under the Proposed Action, there may be an increase in the potential for bird/wildlife aircraft strikes to occur, including those with the federally listed bird species found in Table 1. Between 2005 and 2019, 96 reported bird strikes occurred at or in the immediate vicinity of Kingsley Field ANGB with peaks observed in June, September, and October (NGB 2024). However, 94 percent of aircraft flights would occur above 10,000 feet mean sea level (MSL) which is higher than most birds fly (Table 4). Over 90

percent of reported bird strikes occur at or below 3,000 feet AGL but strikes at higher altitudes are common during migration. Ducks and geese have been observed up to 7,000 feet AGL (FAA 2024). Six percent of aircraft flights would occur below 10,000 feet MSL under the Proposed Action. Flights at those altitudes would have the highest Bird/Wildlife Aircraft Strike Hazard (BASH) risk. Under current operations, 5 percent of flights are below 10,000 feet MSL, but the number of current operations is approximately half of what is proposed, so the likelihood of a bird-aircraft strike is higher under the Proposed Action due to the increased number of proposed operations. Adherence to the existing BASH program would minimize the risk of bird/wildlife aircraft strikes. The 173 FW has developed procedures designed to minimize the occurrence of bird/wildlife aircraft strikes and has documented detailed procedures to monitor and react to heightened risk of bird/wildlife aircraft strikes. When risk increases, limits are placed on low-altitude flight and some types of training (e.g., multiple approaches, closed pattern work) in the airport environment. Special briefings are provided to pilots whenever the potential exists for increased bird/wildlife aircraft strikes within the airspace. Threatened and endangered bird species (Table 1) would experience a negligible increase in risk for BASH under the Proposed Action.

**Table 4 F-35A and F-15C/D Training Altitude Distribution**

| <i>Altitude (Feet)</i> | <i>Percent Use – F-15C/D</i> | <i>Percent Use – F-35A</i> |
|------------------------|------------------------------|----------------------------|
| 500-5,000 AGL          | 2                            | 2                          |
| 5,000 AGL-10,000 MSL   | 5                            | 4                          |
| 10,000-20,000 MSL      | 50                           | 33                         |
| 20,000-30,000 MSL      | 26                           | 39                         |
| 30,000-40,000 MSL      | 17                           | 21                         |
| >40,000 MSL            | 2                            | 1                          |

#### Airspace

During airspace operations (see Attachment 4 for a map of the military training airspace), federally listed birds, mammals, and terrestrial reptiles would be exposed to noise 3 to 5 dB greater in terms of Sound Exposure Level (SEL) and 6 to 8 dB greater in Maximum Sound Level ( $L_{max}$ ) from the F-35A when compared to the F-15C/D (assuming military power and 400 knots). Therefore, the baseline airspace noise levels of 35 to 47 dB Onset-Rate Adjusted Day-Night Average A-weighted Sound Level ( $L_{dnmr}$ ) (depending on the MOA/ATCAA) would increase to 40 to 49 dB  $L_{dnmr}$ , well below the safe limit of continuous noise of 70 dB, and substantially below the 140 dB shown to cause damage to wildlife hearing (Bowles 1995).

While a rare event due to expansiveness of the airspace and high elevation and low frequency of operation, there is the possibility that federally listed birds, mammals, or terrestrial reptiles could be subjected to a very brief direct overflight and experience a peak noise level ( $L_{max}$ ) of 119 dB at if the aircraft passed by at 500 feet AGL. 500 feet AGL is only authorized in the northeastern section of Owyhee North MOA and the northwestern corner of Jarbidge North MOA and managed by Mountain Home AFB. The ANG would continue to follow current and future restrictions in place (USAF, 2020). However, flights at 500–5,000 feet AGL only make up 2 percent of all training and the  $L_{max}$  decreases to 91 dB if an aircraft passes at 5,000 feet AGL. The  $L_{max}$  decreases further to 81 dB at 10,000 feet AGL. Exposure to these peak noise levels would last only a few seconds and the animal would need to be directly beneath the flight path to

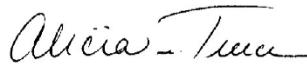
experience this level of noise as the noise reduces drastically the further the animal is from the flight path. No damage to animal hearing is anticipated in this circumstance, as damage to hearing generally only occurs at levels over 140 to 150 dB (Bowles 1995).

Although hearing ranges vary greatly among wildlife groups, models used to estimate hearing capacity in animals are conservative (Bowles 1995), and, as described above, Day-Night Average A-weighted Sound Levels would be well below the safe limit of continuous noise of 70 dB (Bowles 1995), and peak noise levels (Lmax) of 119 dB at 500 feet AGL would be well below the 140 dB shown to cause damage to wildlife hearing (Bowles 1995). Therefore, the noise levels under the Proposed Action would not be expected to cause harm to federally listed birds, mammals, or terrestrial reptiles (species listed in Table 1).

Since the federally listed birds, mammals, and terrestrial reptiles listed in Table 1 may experience temporary and brief noise disturbances from the establishment of the F-35A FTU, airfield and airspace operations under the Proposed Action may affect, but are not likely to adversely affect the threatened and endangered bird, mammal, and terrestrial reptile species listed in Table 1.

We request written concurrence with our determinations as part of the informal consultation process. If you have any questions or concerns, please contact Alicia Treece, NGB Project Manager, National Guard Bureau, NGB/A4FR, 3501 Fetchet Avenue, Joint Base Andrews MD 20762-5157, or [NGB.CCA4F.NEPACOMMENTSOrg@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTSOrg@us.af.mil) with the subject titled as ATTN: F-15EX, F-35A EIS. Thank you in advance for your assistance in this effort.

Sincerely,



Alicia Treece, NGB/A4FR  
NEPA Program Manager

Attachments:

- 1 – Regional Location Map of Kingsley Field ANGB
- 2 – Proposed Construction, Renovation, and Demolition Project Maps
- 3 – Proposed Construction, Renovation, and Demolition Project Tables
- 4 – Kingsley Field ANGB Military Training Airspace Map
- 5 – Proposed Action F-35A Comparison to No Action–DNL Contours
- 6 – Biological Analysis Prepared using IPaC: Klamath Falls ANG F-35A Basing Construction
- 7 – Biological Analysis Prepared using IPaC: Klamath Falls ANG F-35A Airspace



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## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Klamath Falls Fish and Wildlife Office  
1936 California Avenue  
Klamath Falls, Oregon 97601  
(541) 885-8481 FAX (541) 885-7837



In Reply Refer To:  
2026-0016901

Alicia Treece  
NEPA Program Manager  
NGB/A4FR  
Shepperd Hall  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

Subject: Letter of Concurrence for the Basing F-35A Lightning II Formal Training Unit project  
at Kingsley Field Air National Guard Base Klamath Falls, Oregon

Dear Ms. Treece:

This responds to your letter dated and received on November 21, 2025, and updated final version on December 11, 2025 (Assessment), requesting concurrence from the U.S. Fish and Wildlife Service (Service), pursuant to the requirements of section 7 of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.), for the subject action. The Service's response to your request is based on the biological assessment included in your letter, the attachments, and information in our files.

The proposed project (Project) is the retention, operation, and associated infrastructure construction of one FTU squadron of F-35A Lightning II (F-35A) aircraft at Kingsley Field Air National Guard Base (ANGB) at the Crater Lake-Klamath Regional Airport (LMT), in Klamath Falls, Oregon. The proposed squadron consists of up to 24 F-35A Primary Aerospace Vehicles Authorized (PAA) and two Backup Aerospace Vehicles Authorized (BAA) and will replace the existing 26 F-15C/D aircraft.

All infrastructure construction will take place on the Kingsley Field ANGB in previously disturbed and developed areas and includes the demolition and/or renovation of existing facilities as well as the construction of new facilities. Much of the proposed construction and renovation will occur before the first new aircraft arrives but may continue afterwards. Delivery of the first aircraft will likely occur in Fiscal Year (FY) 2027 with the remaining aircraft delivered in or by FY 2029, for a total of up to 23 F-35 PAA (plus two BAA).

Ms. Trecece\_F35A Training

Reference 2026-0016901

F-35A aircrews will conduct combat readiness training operations in two types of areas: (1) an airfield associated with an installation, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A will use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures. Established military training airspace configurations, as previously assessed within the *Environmental Impact Statement for Proposed Establishment and Modification of Oregon Military Training Airspace* (NGB 2017), will remain the same, although F-35A training requirements will increase to 4,585 hours compared to 3,194 hours required for F-15C/D aircraft.

The National Guard Bureau (NGB) and the Department of the Air Force (DAF) determined that the Proposed Action at Kingsley Field ANGB will have no effect on federally listed species found within the installation as their habitat does not overlap the project construction footprint, nor is there critical habitat occurring within the base boundaries. While Applegate's milk-vetch (*Astragalus applegatei*) does occur on base, areas of occurrence are known and monitored (173 FW 2024), and the construction footprint will not overlap with these areas. Therefore, the NGB and DAF dismissed these species from further consideration related to construction generated impacts.

For the associated airspace, the NGB and DAF have determined that the proposed action may affect, but is not likely to adversely affect western snowy plover (*Charadrius nivosus*), yellow-billed cuckoo (*Coccyzus americanus*), northern spotted owl (*Strix occidentalis caurina*), Hawaiian petrel (*Pterodroma sandwichensis*), marbled murrelet (*Brachyramphus marmoratus*), short-tailed albatross (*Phoebastria albatrus*), gray wolf (*Canis lupus*), North American wolverine (*Gulo gulo luscus*), and pacific marten (Coastal Distinct Population Segment, *Martes caurina*). The proposed action will not affect designated critical habitat for federally listed species occurring under the airspace. The NGB and DAF also determined the proposed action would have "no effect" to 30 federally listed or proposed species within the action area (Assessment p. 3 and 4, 2025). The Service does not have the authority to provide concurrence for "no effect" determinations due to policy and implementing regulations for section 7 of the Act. Therefore, the Service's concurrence on the determinations made by the NGB and DAF is limited to the effects to the species listed above that may be affected by the Project.

#### Effects to Species

The proposed action will increase the noise levels at Kingsley Field ANGB and under the airspace, potentially impacting the above listed species. The size of the Day-Night Average Sound Level (DNL) contours in all directions from the base will increase as a result of the proposed increase in operations and the higher noise levels of the F-35A as compared to the F-15C/D. Noise levels on off-airport acres are expected to increase to 65-85 dB DNL, with two acres potentially exposed to levels greater than 85 dB DNL. However, there is little to no wildlife habitat on Kingsley Field ANGB and any species within proximity to project activities are likely used to elevated noise levels associated with aircraft, military, commercial, industrial, and agricultural operations. Therefore, small increases in noise levels will not result in significant negative effects to federally listed species that occur near the base.

Airspace noise levels during operations will increase three to five dB in terms of Sound Exposure Level (SEL) and six to eight dB greater in Maximum Sound Level ( $L_{max}$ ) compared to the F-15C/D. The level of 35 to 47 dB Onset-Rate Adjusted Day-Night Average A-weighted

Ms. Trecece\_F35A Training

Reference 2026-0016901

Sound Level ( $L_{dnmr}$ ) will increase to 40-49 dB  $L_{dnmr}$ . This level remains well below the safe 70db limit for continuous noise and substantially below the 140 dB shown to damage wildlife hearing (Bowles 1995). Peak noise levels of up 119 dB could occur if an aircraft passed directly above an animal at 500 feet above ground level (AGL) but would last only seconds and would still remain under the 140 dB damage level. Additionally, only two percent of the flights would occur between 500 – 5,000 feet AGL, so there would be a low likelihood of disturbance effects to the affected species. Therefore, the small increases in noise levels would result in discountable effects to federally listed species that occur under the airspace.

Due to the increased number of airfield operations under the proposed action the potential for bird/wildlife aircraft strikes to occur may increase, including the federally listed bird species listed above. However, continued adherence to the existing Bird/Wildlife Aircraft Strike Hazard (BASH) program, which contains procedures designed to minimize occurrences of bird/wildlife aircraft strikes within the airspace, will minimize this risk. Therefore, any negative impacts to listed species from aircraft strikes related to the proposed action will be negligible.

#### Summary and Conclusion

In summary, the Project is not expected to result in adverse effects to the above listed federally listed species or their designated critical habitat. Based on the information provided in your the biological assessment included in your letter, the attachments, and information in our files, we concur with the determination that the Project may affect, but is not likely to adversely affect the western snowy plover, yellow-billed cuckoo, northern spotted owl, Hawaiian petrel, marbled murrelet, short-tailed albatross, grey wolf, North American wolverine, and pacific marten (Coastal Distinct Population Segment).

This concludes informal consultation pursuant to section 7 of the Act. Reinitiation of consultation on this action may be necessary if: (1) new information reveals effects of the action that may affect species or critical habitats in a manner or to an extent not considered in the assessment; (2) the action is subsequently modified in a manner that causes an effect to species or critical habitats not considered in this analysis; or (3) a new species is listed or critical habitat designated that may be affected by the proposed action.

Thank you for your efforts to conserve federally listed species. If you have any questions about this document, please contact Jeanne Spaur at [jeanne\\_spaur@fws.gov](mailto:jeanne_spaur@fws.gov).

Sincerely,

**JENNIE LAND**

Jennie Land  
Field Supervisor

Digitally signed by JENNIE  
LAND  
Date: 2026.02.18 13:22:56  
-08'00'

Ms. Trecece\_F35A Training

Reference 2026-0016901

Cc: Kessina Lee, USFWS, Oregon State Supervisor

Lisa Ellis, USFWS, Idaho State Supervisor

Kristen Jule, USFWS, Reno Field Supervisor

References Cited

173 FW. 2024. Final Report Threatened and Endangered Species Surveys and Management Plan. 173rd Fighter Wing, Kingsley Field Air National Guard Base, Klamath Falls, Oregon. March.

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National Guard Bureau. 2017. Environmental Impact Statement for Proposed Establishment and Modification of Oregon Military Training Airspace. April.

**APPENDIX B2**  
**NATIVE AMERICAN CORRESPONDENCE**

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The sample tribal scoping letter following was distributed to the list below:

Betty Aleck, THPO, Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada, 208 Capitol Hill, Nixon NV 89424

Christopher Bailey, Cultural Protection Specialist, Confederated Tribes of the Grand Ronde Community of Oregon, 8720 Grand Ronde Rd, Grand Ronde OR 97347-9712

Yatch Bamford, Chairman, Pit River Tribe, California, 36970 Park Ave, Burney CA 96013

Doug Barrett, Chief, Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, 1245 Fulton Ave, Coos Bay OR 97420

Gracie Begay, Chairwoman, Wells Band of the Te-Moak Tribe of Western Shoshone Indians, PO Box 809, Wells NV 89835

Darryl Brady, Chairman, Yomba Shoshone Tribe of the Yomba Reservation, Nevada, HC 61, Box 6275, Austin NV 89310

Robert Brunoe, THPO, Confederated Tribes of the Warm Springs Reservation of Oregon, PO Box C, Warm Springs OR 97761

Robert Burkybile, Chief, Modoc Nation, 22 N Eight Tribes Trail, Miami OK 74354

Patrick Burt, THPO, Washoe Tribe of Nevada & California (Carson Colony, Dresslerville Colony, Woodfords Community, Stewart Community, & Washoe Ranches), Highway 395 South, Gardnerville NV 89410

Rose Clayburn, THPO, Yurok Tribe of the Yurok Reservation, PO Box 1027, Klamath CA 95548

Alan Crawford, Chairman, Confederated Tribes of the Umatilla Indian Reservation, Nixyaawii Governance Center, 46411 Timine Way, Pendleton OR 97801

Arlo Crutcher, Chairman, Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation, Nevada and Oregon, 111 N Reservation Rd, McDermitt NV 89421

Carla Dahlberg, Chairman, Fort Independence Indian Reservation, PO Box 67, Independence CA 93526

Melissa Daniello, Chairperson, Cedarville Rancheria, California, 300 W 1st St, Alturas CA 96101

Phillip Del Rosa, Chairperson, Alturas Indian Rancheria, California, 901 County Road 56, Alturas CA 96101

Darren Delgado, THPO, Bishop Paiute Tribe, 50 Tu Su Ln, Bishop CA 93514

Kathy Dowd, THPO, Resighini Rancheria, California, PO Box 529, Klamath CA 95548

Michon Eben, THPO, Reno-Sparks Indian Colony, Nevada, 98 Colony Rd, Reno NV 89502

Elwood Emm, Chairman, Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada, 171 Campbell Ln, Yerington NV 89447

Cynthia Ford, THPO, Tolowa Dee-ni' Nation, 12801 Mouth of Smith River Rd, Smith River CA 95567

Natalie Forrest-Perez, Interim THPO, Pit River Tribe, California, 36970 Park Ave, Burney CA 96013

Davis Gonzales, Chairperson, Indians of Nevada (Four constituent bands: Battle Mountain Band; Elko Band; South Fork Band and Wells Band), 525 Sunset St, Elko NV 89801

Lawanda Green, THPO, Elk Valley Rancheria, California, 2332 Howland Hill Rd, Crescent City CA 95531

Danelle Gutierrez, THPO, Big Pine Paiute Tribe, PO Box 700, Big Pine CA 93513

David Harrelson, Program Manager and THPO, Confederated Tribes of the Grand Ronde Community of Oregon, 9615 Grand Ronde Rd, Grand Ronde OR 97347

Arian Hart, Chairperson, Susanville Indian Rancheria, 745 Joaquin St, Susanville CA 96130

Joseph Holley, Chairman, South Fork Band of the Te-Moak Tribe of Western Shoshone Indians of Nevada, 525 Sunset St, Elko NV 89801

Joseph James, Chairperson, Yurok Tribe of the Yurok Reservation, 190 Klamath Blvd, Klamath CA 95548

Carla Keene, Chairman, Cow Creek Band of Umpqua Tribe of Indians, 2371 NE Stephens, Ste 100, Roseburg OR 97470-1399



Cheryle Kennedy, Tribal Chairwoman, Confederated Tribes of the Grand Ronde Community of Oregon, 9615 Grand Ronde Rd, Grand Ronde OR 97347-9712

Courtney Krossman, THPO, Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, 1245 Fulton Ave, Coos Bay OR 97420

Chrissy Lamarr, THPO, Susanville Indian Rancheria, 745 Joaquin St, Susanville CA 96130

Buddy Lane, Cultural Resources Manager, Confederated Tribe of Siletz Indians, PO Box 549, Siletz OR 97380

Gerald Lewis, Chairman, Confederated Tribes and Bands of the Yakama Nation, PO Box 151, Toppenish, WA 98948-0151

Randi Lone Eagle, Chairwoman and THPO, Summit Lake Paiute Tribe of Nevada, 2255 Green Vista Dr, Ste 402, Sparks NV 89431

Joshua Mann, THPO, Eastern Shoshone Tribe of the Wind River Reservation, PO Box 538, Fort Washakie WY 82514

Andrea Martinez, Chairwoman, Walker River Paiute Tribe of the Walker River Reservation, Nevada, PO Box 220, Schurz NV 89427-0220

Brian Mason, Tribal Chairman, Shoshone-Paiute Tribes of the Duck Valley Reservation, Nevada, 1036 Idaho State Highway 51, PO Box 219, Owyhee NV 89832-0219

Brenda Meade, Chairperson, Coquille Indian Tribe, 3050 Tremont St, North Bend OR 97459-3059

Arlan Melendez, Chairperson, Reno-Sparks Indian Colony, Nevada, 34 Reservation Rd, Reno NV 89502

Carey Miller, THPO, Confederated Tribes of the Umatilla Indian Reservation, Nixyaawii Governance Center, 46411 Timine Way, Pendleton OR 97801

Dale Miller, Chairperson, Elk Valley Rancheria, California, 2332 Howland Hill Rd, Crescent City CA 95531

Amos Murphy, Chairman, Confederated Tribes of Goshute Reservation, Nevada and Utah, HC 61, Box 6104, Ibapah UT 84034

Fawn Murphy, Chairperson, Resighini Rancheria, California, 158 E Klamath Beach Rd, Klamath CA 95548

James Phoenix, Chairman, Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada, 208 Capitol Hill, Nixon NV 89424

Meryl Picard, Chairwoman, Bishop Paiute Tribe, 50 Tu Su Ln, Bishop CA 93514

Delores Pigsley, Chairwoman, Confederated Tribes of Siletz Indians, PO Box 549, Siletz OR 97380

Jackie Potter, Jr., Chairman, Redding Rancheria, 2000 Redding Rancheria, Redding CA 96001

William Ray, Jr., Chairman, Klamath Tribes, 501 Chiloquin Blvd, Chiloquin OR 97624

Christina Rubidoux, Director of the Culture & Heritage Department, Klamath Tribes, PO Box 436, Chiloquin OR 97624

Germain Ruvalcaba, Chairman, Fort Bidwell Indian Community of the Fort Bidwell Reservation of California, 130 Mee Thee Uh Rd., Fort Bidwell CA 96112

Shane Saulque, Chairman, Utu Utu Gwaitu Paiute Tribe, 25669 Highway 6 PMBI, Benton CA 93512

Linzey Scott, Acting THPO, Walker River Paiute Tribe of the Walker River Reservation, Nevada, PO Box 220, Schurz NV 89427-0220

Leilah Shephard, THPO, Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada, 565 Rio Vista Dr, Fallon NV 89406-6415

Carolyn Smith, Cultural Resources Coordinator, Shoshone-Bannock Tribes of the Fort Hall Reservation, PO Box 306, Fort Hall ID 83203

Jonathan Smith, Chairman, Confederated Tribes of the Warm Springs Reservation of Oregon, 1233 Veterans St, Warm Springs OR 97761

Serrell Smokey, Chairman, Washoe Tribe of Nevada & California (Carson Colony, Dresslerville Colony, Woodfords Community, Stewart Community, & Washoe Ranches), 919 US Highway 395 North, Gardnerville NV 89410

Charisse Soucie, THPO, Burns Paiute Tribe, 100 Pasigo St, Burns OR 97720

John St. Clair, Chairman, Eastern Shoshone Tribe of the Wind River Reservation, PO Box 538, Fort Washakie WY 82514  
Ben Steward, Tribal Archaeologist and Historic Preservation Officer (Acting), Cow Creek Band of Umpqua Tribe of Indians, 2371 NE Stephens St, Ste 100, Roseburg OR 97470-1399  
Cheyenne Stone, Chairperson, Big Pine Paiute Tribe, PO Box 700, Big Pine CA 93513  
Diane L. Teeman, Chairperson, Burns Paiute Tribe, 100 Pasigo St, Burns OR 97720  
Gerald Temoke, Chairperson, Elko Band of the Te-Moak Tribe of Western Shoshone Indians of Nevada, 1745 Silver Eagle Dr, Elko NV 89801  
Jeri Thompson, Chairperson, Tolowa Dee-ni' Nation, 12801 Mouth of Smith River Rd, Smith River CA 95567  
Lee Tyler, Chairman, Shoshone-Bannock Tribes of the Fort Hall Reservation, Agency Building 82, 1 Pima Dr, Fort Hall ID 83203  
Thomas Wasson, Chairman, Winnemucca Indian Colony of Nevada, 200 S Virginia St, 8th Fl, Winnemucca NV 89501  
Bridgett Wheeler, Interim THPO, Coquille Indian Tribe, 3050 Tremont St, North Bend OR 97459-3059  
Catherine Williams-Tuni, Chairwoman, Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada, 565 Rio Vista Dr, Fallon NV 89406-6415  
Mary Wuester, Chairperson, Lone Pine Paiute Shoshone Tribe, 1103 S Main St, Lone Pine CA 93545



**Sample Tribal Letter**

**DEPARTMENT OF THE AIR FORCE  
173D FIGHTER WING  
KINGSLEY FIELD OREGON**

13 June 2024

Colonel Lee R. Bouma  
173 FW/CC  
211 Arnold Ave. Building A  
Klamath Falls OR 97603

Phillip Del Rosa  
Chairperson  
Alturas Indian Rancheria, California  
901 County Road 56  
Alturas CA 96101

**SUBJECT: Invitation to Initiate Government-to-Government Consultation Associated  
with the Kingsley Field F-35A Lightning II Beddown Environmental Impact Statement**

Dear Chairperson Del Rosa

The Oregon Air National Guard (ORANG) would like to formally invite you and your representatives to consult on a proposed F-35A Lightning II (F-35A) beddown at the 173d Fighter Wing (173 FW) Kingsley Field Air National Guard Base (ANGB) located in Klamath Falls, OR (Attachment 1). We are hopeful that this invitation to consult will serve as the beginning of an open dialogue with the goal of building long-lasting relationships between the ORANG and Tribal Nations.

Pursuant to the National Environmental Policy Act of 1969 (NEPA), the National Guard Bureau (NGB) is preparing an Environmental Impact Statement (EIS) that will analyze impacts that could significantly affect the quality of the human environment, including those with the potential to affect historic properties, sacred sites, and traditional cultural properties. The purpose of the Proposed Action is to increase F-35A pilot training opportunities in support of the National Defense Strategy. In addition to the beddown and use of the F-35A, the Proposed Action would require facility improvements and the construction of new structures and infrastructure in support of this mission. The F-35As will replace the F-15C/D fleet currently stationed at Kingsley Field. This beddown action and associated training would ensure the availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this Proposed Action; however, there could be an increase in operations within the airspace. The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

The NGB has reviewed the undertaking and is currently defining the project's Area of Potential Effects (APE) as the jurisdictional boundary of Kingsley Field ANGB (Attachment 3), areas affected by noise levels of 65 dB DNL and greater from the aircraft operations, and lands located beneath existing military training airspace from surface level to the top of each airspace designation plus a 1-mile horizontal buffer (Attachment 4). As the EIS develops to include results from the noise study, NGB will continue to consult with federally recognized Tribes regarding any possible changes to the APE identified in this initial notification letter.

As part of our efforts to evaluate the effects of our action, we respectfully invite you to consult on the attached project details, the proposed APE, and to provide comments for our proposed undertaking. If you would like to request formal consultation, we will work with you to adopt procedures that meet the needs and requirements of your Tribe. Please provide comments to Michelle Kasunic, Acting Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [michelle.kasunic@us.af.mil](mailto:michelle.kasunic@us.af.mil) with the subject titled **ATTN: 173 FW EIS**. Thank you for your assistance, and we look forward to working with you as the proposed EIS continues to develop.

Sincerely,

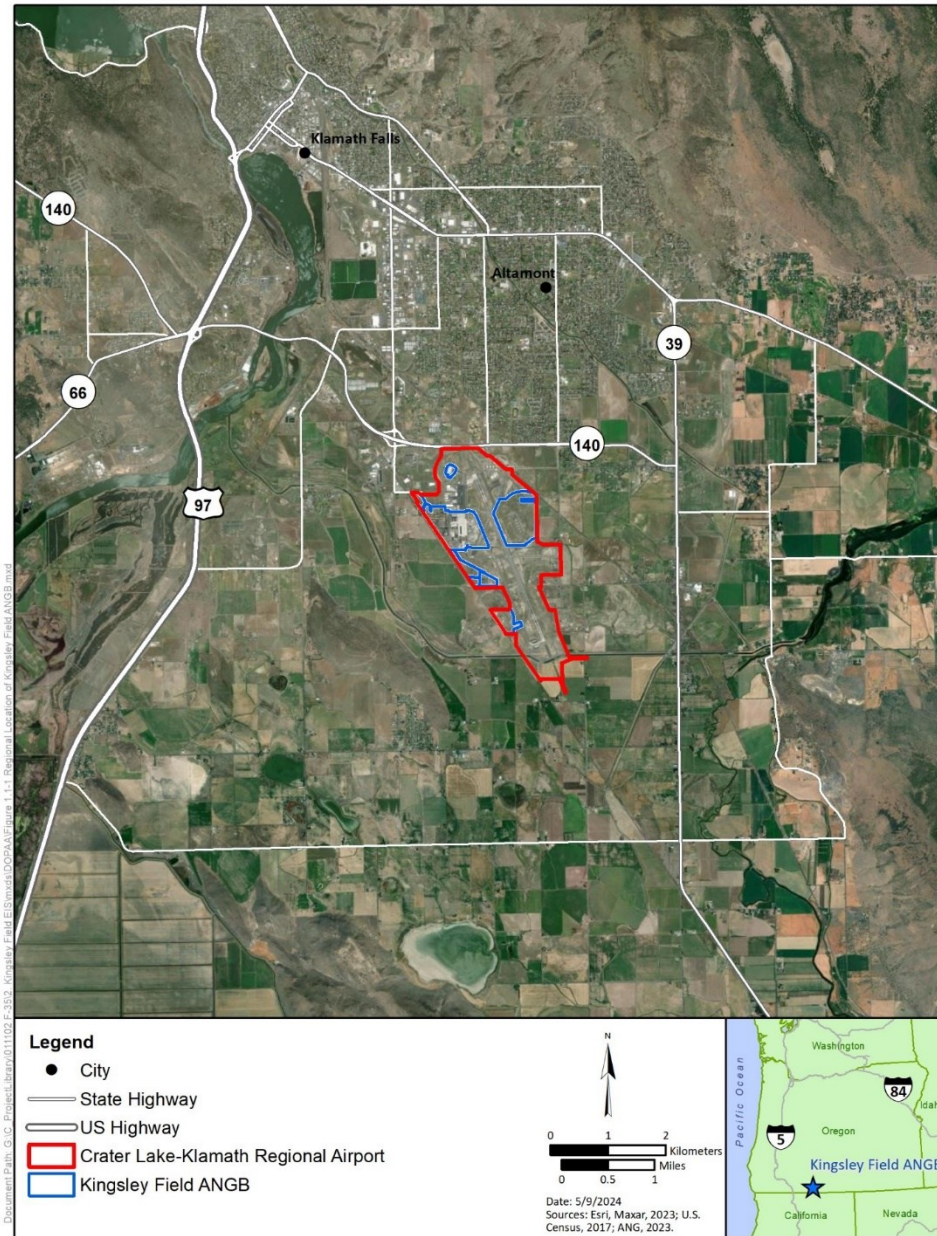


LEE R. BOUMA, Colonel, ORANG  
Commander, 173d Fighter Wing

Attachments:

1. Regional Location Map of Kingsley Field ANGB
2. Proposed Construction, Renovation, and Demolition Project Table
3. Kingsley Field ANGB Area of Potential Effects
4. Kingsley Field ANGB Military Training Airspace Map
5. List of Tribes Being Consulted

Attachment 1 – Regional Location Map of Kingsley Field ANGB



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

**Summary of Construction and Renovation Projects**

| <i>Project #/<br/>Project<br/>Name.</i>                     | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                        | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|-------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#1 Provide<br/>Training<br/>Classrooms<sup>1</sup></b>   | <b>1a</b>         | Modify existing B209 (existing simulator building) to house flight training classrooms (companion to Project 1b/1c).                                              | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                             | <b>1b</b>         | Construct addition to B209 to include entire category code (i.e., authorized area) for flight training classrooms (companion to Project 1a/1c).                   | Alternate                                    | 2027                         | 3,500                                                            | 3,500                                          | Yes                        | No                               |
|                                                             | <b>1c</b>         | Construct new building containing 4 FMS, 6 MMRT, and contractor support (companion to Project 1a/1b).                                                             | Alternate                                    | 2027                         | 29,583                                                           | 29,583                                         | Yes                        | No                               |
|                                                             | <b>1d</b>         | Construct new building containing flight training classrooms, 4 full motion simulators, 6 MMRT, and contractor support (includes demolition of B242, B230, B231). | Preferred                                    | 2027                         | 38,300                                                           | 23,958                                         | Yes                        | No                               |
| <b>#2 Construct<br/>Echo<br/>Aircraft<br/>Shelter</b>       | <b>2</b>          | Construct 4-bay, 8 aircraft shelter sized to universal fighter standards.                                                                                         | Preferred                                    | 2027                         | 316,000                                                          | 272,000                                        | Yes                        | No                               |
| <b>#3<br/>Operations<br/>Group<br/>Facility<sup>2</sup></b> | <b>3a</b>         | Repair B243 operations group facility to meet F-35 requirements for special access program facilities, office space, and contractor support.                      | Alternate                                    | 2028                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                             | <b>3b</b>         | Construct new operations group facility containing special access program facilities, office space, contractor support (includes demolition of B243).             | Alternate                                    | 2028                         | 25,200                                                           | 0                                              | Yes                        | No                               |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
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Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project<br/>Name.</i>            | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                                                                        | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|----------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
|                                                    | <b>3c</b>         | Construct new operations group facility combined with maintenance facility containing special access program facilities, office space, contractor support, includes demolition of B243 (companion to Project 9d). | Preferred                                    | 2028                         | 25200                                                            | 0                                              | Yes                        | No                               |
| <b>#4 ASE<br/>Facility<sup>3</sup></b>             | <b>4a</b>         | Repair B216 for use as aircraft support equipment facility.                                                                                                                                                       | Alternate                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>4b</b>         | Construct addition to B332 to accommodate increase requirement for ASE facility                                                                                                                                   | Preferred                                    | 2029                         | 1,750                                                            | 0                                              | Yes                        | No                               |
|                                                    | <b>4c</b>         | Construct new B332 for use as ASE facility                                                                                                                                                                        | Alternate                                    | 2029                         | 15,000                                                           | 0                                              | Yes                        | No                               |
|                                                    | <b>4d</b>         | Repair B213 for use as ASE facility                                                                                                                                                                               | Alternate                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
| <b>#5 Engine<br/>Shop<sup>4</sup></b>              | <b>5a</b>         | Repair B213 engine shop for change in engine system and to include wheel/tire facility.                                                                                                                           | Alternate                                    | 2028                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>5b</b>         | Construct new engine shop for change in engine system and to include wheel/tire facility.                                                                                                                         | Alternate                                    | 2028                         | 15,000                                                           | 5,000                                          | Yes                        | No                               |
| <b>#6 Avionics/<br/>Pilot Fitment<br/>Facility</b> | <b>6a</b>         | Repair B331 to accommodate reduced avionics, battery room, and pilot fitment facility.                                                                                                                            | Preferred                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>6b</b>         | Construct new B331 avionics, battery room, and pilot fitment facility.                                                                                                                                            | Alternate                                    | 2028                         | 12,000                                                           | 0                                              | Yes                        | No                               |
| <b>#7 Loading<br/>Dock</b>                         | <b>7</b>          | Repair loading dock for larger load leveler and better space utilization.                                                                                                                                         | Preferred                                    | 2026                         | 50,000                                                           | 4,000                                          | Yes                        | No                               |
| <b>#8<br/>Temporary<br/>LAMS<br/>Shelters</b>      | <b>8</b>          | Install temporary LAMS shelters for aircraft on existing pavements.                                                                                                                                               | Preferred                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
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Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project<br/>Name.</i>                                                  | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                               | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|------------------------------------------------------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#9<br/>Maintenance<br/>Hangar and<br/>Shops<sup>5</sup></b>                           | <b>9a</b>         | Repair and reconfigure B219 maintenance hangar and shops to include improvements for seismic, light protection systems, and fire protection systems.                     | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                                                          | <b>9b</b>         | Construct new 6-aircraft maintenance hangar (Phase 1), includes demolition of east bay B219 (integrates with 9c Phase 2).                                                | Alternate                                    | 2028                         | 50,700                                                           |                                                | Yes                        | No                               |
|                                                                                          | <b>9c</b>         | Construct new aircraft maintenance shops (Phase 2), includes demolition of west bay B219 (integrates with 9b Phase 1).                                                   | Alternate                                    | 2026                         | 36,800                                                           |                                                | Yes                        | No                               |
|                                                                                          | <b>9d</b>         | Construct new combined 6-aircraft maintenance hangar, aircraft maintenance shops, and AMU. Includes demolition of B219.                                                  | Preferred                                    | 2027                         | 90,000                                                           |                                                | Yes                        | No                               |
| <b>#10<br/>Munitions<br/>Maintenance<br/>and<br/>Inspection<br/>Facility<sup>6</sup></b> | <b>10a</b>        | Repair existing maintenance and inspection facility to meet SCIF needs and update systems.                                                                               | Preferred                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                                                          | <b>10b</b>        | Construct new munitions maintenance and inspection facility for 1.1 (mass detonation) and 1.2 (fragmentation) explosives operations to meet minimum explosive standards. | Preferred                                    | 2026                         | 3,900                                                            | 3,900                                          | Yes                        | No                               |
| <b>#11<br/>Munitions<br/>Trailer</b>                                                     | <b>11</b>         | Construct new pull through maintenance facility for large trailers.                                                                                                      | Preferred                                    | 2026                         | 1,500                                                            |                                                | Yes                        | No                               |
| <b>#12<br/>Munitions<br/>Assembly<br/>Pad</b>                                            | <b>12</b>         | Construct new munitions assembly pad and inert storage facility.                                                                                                         | Preferred                                    | 2030                         | 20,000                                                           | 20,000                                         | Yes                        | No                               |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project Name.</i>          | <i>Project ID</i> | <i>Project Description</i>                                                                                                   | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|----------------------------------------------|-------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#13 Weapons Facility<sup>7</sup></b>      | <b>13a</b>        | Repair B500 weapons release facility to meet standards for F-35 and safety and seismic upgrades.                             | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                              | <b>13b</b>        | Construct new hangar bay for weapons load training and light protection system parking spot                                  | Preferred                                    | 2027                         | 15,000                                                           | 15,000                                         | Yes                        | No                               |
|                                              | <b>13c</b>        | Construct new facility attached to weapons load training bay including all shops for associated AMU AFSC's (currently AMXS). | Alternate                                    | 2027                         | 22,400                                                           | 22,400                                         | Yes                        | No                               |
|                                              | <b>13d</b>        | Construct new weapons release facility attached to weapons load training facility.                                           | Preferred                                    | 2027                         | 18,000                                                           | 18,000                                         | Yes                        | No                               |
| <b>#14 Fuel Cell Bay<sup>8</sup></b>         | <b>14</b>         | Construct additional fuel cell maintenance bay onto existing B333 fuel cell bay, and light protection system parking spot    | Preferred                                    | 2029                         | 6,800                                                            | 0                                              | Yes                        | No                               |
| <b>#15 Taxiway A</b>                         | <b>15</b>         | Repair Taxiway A access ramp to B400                                                                                         | Preferred                                    | 2026                         | 8,500                                                            | 0                                              | Yes                        | No                               |
| <b>#16 LRS Covered Parking</b>               | <b>16</b>         | Construct LRS covered parking for LRS primary vehicles.                                                                      | Preferred                                    | 2030                         | 2,000                                                            | 2,000                                          | Yes                        | Yes                              |
| <b>#17 Civil Engineering Covered Parking</b> | <b>17</b>         | Construct civil engineering covered parking for snow plowing vehicles.                                                       | Preferred                                    | 2030                         | 4,000                                                            | 4,000                                          | Yes                        | Yes                              |
| <b>#18 Troop Camp</b>                        | <b>18a</b>        | Repair existing B208 troop camp.                                                                                             | Preferred                                    | 2040                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                              | <b>18b</b>        | Construct new troop camp.                                                                                                    | Alternate                                    | 2040                         | 17,489                                                           | 0                                              | Yes                        | Yes                              |
| <b>#19 Services Facility</b>                 | <b>19a</b>        | Repair B209 services facility.                                                                                               | Preferred                                    | 2035                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                              | <b>19b</b>        | Construct new services facility.                                                                                             | Alternate                                    | 2035                         | 2,950                                                            | 0                                              | Yes                        | Yes                              |
| <b>#20 Base Exchange/Starbase</b>            | <b>20a</b>        | Repair B302 base exchange and starbase facility.                                                                             | Preferred                                    | 2035                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                              | <b>20b</b>        | Construct new base exchange and starbase facility.                                                                           | Alternate                                    | 2035                         | 7,860                                                            | 0                                              | Yes                        | Yes                              |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project<br/>Name.</i>    | <i>Project ID</i> | <i>Project Description</i>                                                                       | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|--------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#21 Civil<br/>Engineering<br/>Shops</b> | <b>21a</b>        | Construct new civil engineering combined facility.                                               | Preferred                                    | 2030                         | 30,000                                                           | 25,600                                         | Yes                        | Yes                              |
|                                            | <b>21b</b>        | Repair B220 civil engineering shops.                                                             | Alternate                                    | 2030                         |                                                                  |                                                | Yes                        | Yes                              |
|                                            | <b>21c</b>        | Repair B221 civil engineering administration.                                                    | Alternate                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                            | <b>21d</b>        | Repair B234 civil engineering emergency management and storage.                                  | Alternate                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
| <b>#22 Dining<br/>Facility</b>             | <b>22a</b>        | Repair B130 dining facility.                                                                     | Preferred                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                            | <b>22b</b>        | Construct new dining facility.                                                                   | Alternate                                    | 2030                         | 10,800                                                           | 0                                              | Yes                        | Yes                              |
| <b>#23 C-17<br/>Ramp</b>                   | <b>23</b>         | Construct C-17 Ramp on the east side of airfield for C-17 movement per the Oregon Cascadia Zone. | Preferred                                    | 2026                         | 300,000                                                          | 300,000                                        | Yes                        | Yes                              |

*Notes:* <sup>1</sup>Project 1 would require the choice of Project 1a, 1b, 1c combined or Project 1d alone. Project 1d would require the demolition of B242, B230, and B231.

<sup>2</sup>Project 3 would require the choice between Project 3a, 3b, or 3c. Project 3c requires selection of Project 9d.

<sup>3</sup>Project 4 would require the choice between Project 4a, 4b, 4c, or 4d.

<sup>4</sup>Project 5a/5b would not be implemented if the preferred Project 9d is implemented. Implementation of Project 5a or 5b required that Project 9a be implemented.

<sup>5</sup>Project 9 would require the choice of Project 9a, Project 9b/9c, or Project 9d. Implementation of the Project 9c or 9d options would eliminate the need for Project 5a/5b.

Project 9d is the companion to Project 3c. Project 9d would eliminate the need for Project 13c.

<sup>6</sup>Project 10b would require demolition of B540 and B541.

<sup>7</sup>Project 13 would require the choice of the following: 13a/13b, 13b/c, or 13 b/d. Project 13c would not be compatible with 9d.

<sup>8</sup>Project 14 would require demolition of B334.

*Legend:* AMU = aircraft maintenance unit; AFSC = air force specialty code; AMXS = aircraft maintenance squadron; ASE = aircraft support equipment; B = Building, FMS = full motion simulator; LAMS = large area maintenance shelters; LRS = logistics readiness squadron; MMRT = mobile mission rehearsal trainer; PFF = pilot fitment facility; SCIF = sensitive compartmented information facilities; SF = square feet

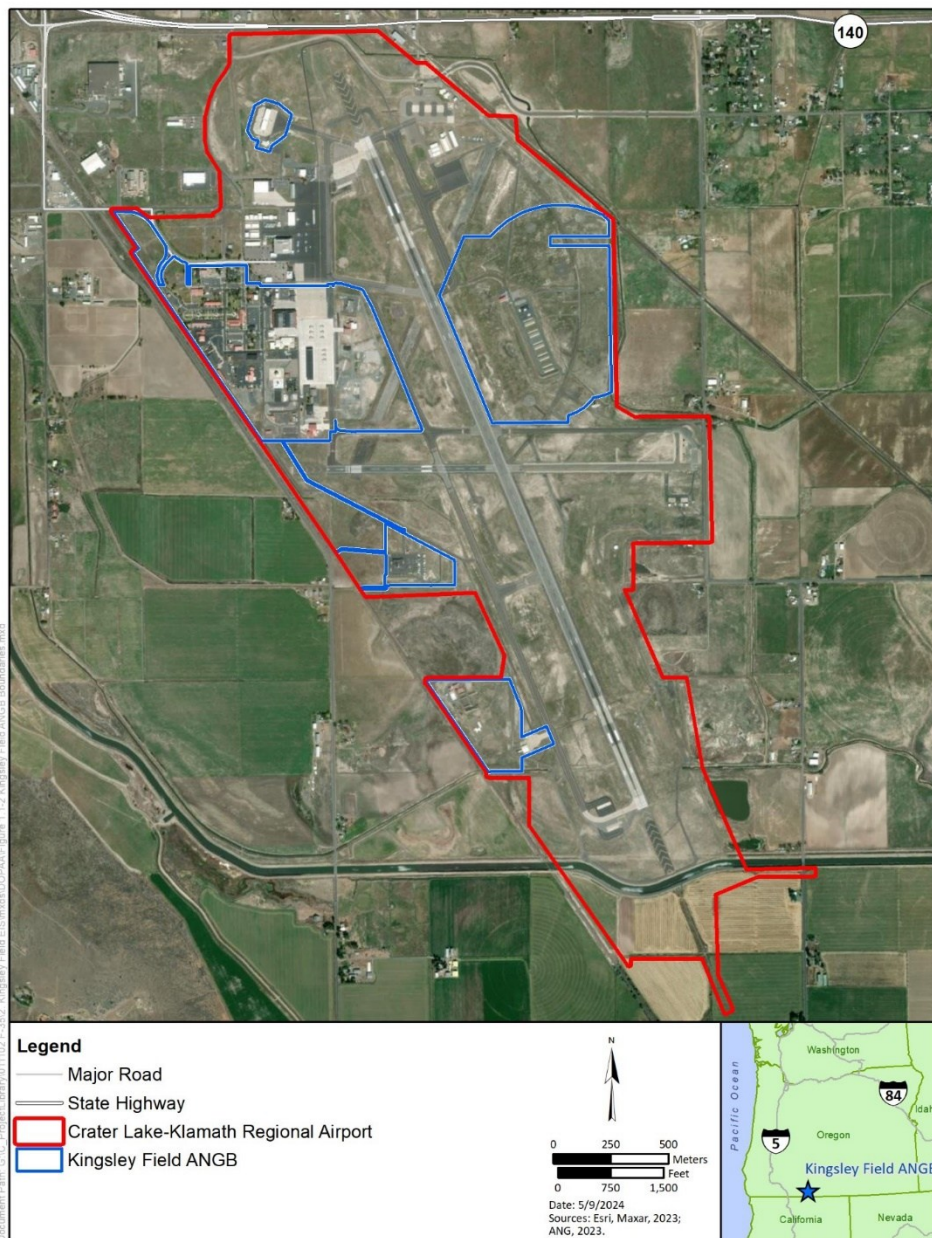
Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

**Proposed Demolition Projects**

| <i>Building Number</i>          | <i>Total Area of Demolition (SF)</i> | <i>Year Building was Constructed</i> | <i>Year Proposed for Demolition</i> |
|---------------------------------|--------------------------------------|--------------------------------------|-------------------------------------|
| B209                            | 8,717                                | 1989                                 | 2030                                |
| B213                            | 15,271                               | 1959                                 | 2030                                |
| B215                            | 2,400                                | 1959                                 | 2030                                |
| B219                            | 83,305                               | 1959                                 | 2026                                |
| B230                            | 2,926                                | 1959                                 | 2026                                |
| B231                            | 2,916                                | 1958                                 | 2026                                |
| B242                            | 2,830                                | 1961                                 | 2026                                |
| B243                            | 32,570                               | 1987                                 | 2030                                |
| B334                            | 3,772                                | 1987                                 | 2029                                |
| B500                            | 12,112                               | 1957                                 | 2030                                |
| B540                            | 5,450                                | 1959                                 | 2030                                |
| B541                            | 5,450                                | 1959                                 | 2026                                |
| <b>Total SF of Demolition =</b> | <b>177,719</b>                       |                                      |                                     |

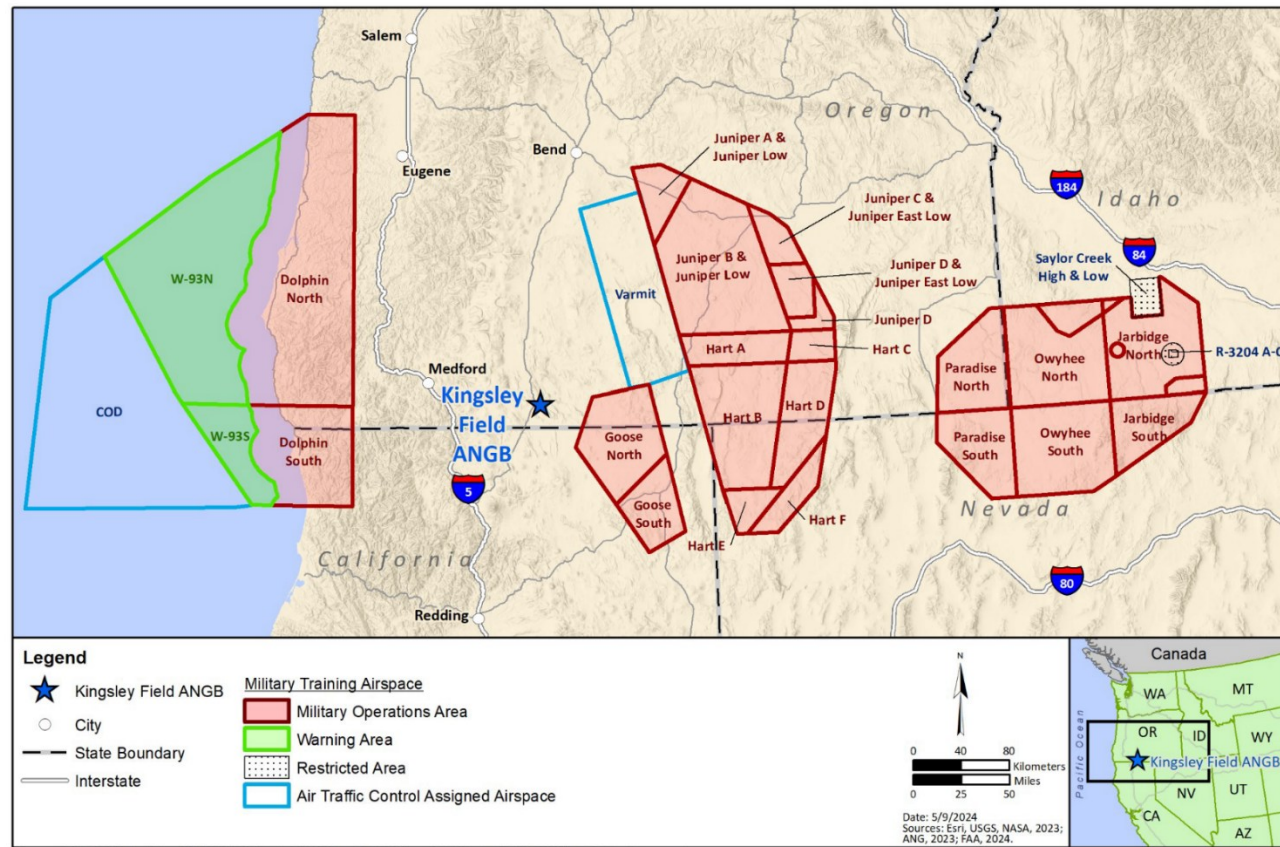
*Legend:* B = Building; SF = square feet.

Attachment 3 – Kingsley Field ANGB Area of Potential Effects



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 4 – Kingsley Field ANGB Military Training Airspace



Attachment 5 List of Tribes Being Consulted

- Alturas Indian Rancheria, California
- Big Pine Paiute Tribe
- Bishop Paiute Tribe
- Burns Paiute Tribe
- Cedarville Rancheria, California
- Confederated Tribes and Bands of the Yakama Nation
- Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians
- Confederated Tribes of Goshute Reservation, Nevada and Utah
- Confederated Tribes of the Grand Ronde Community of Oregon
- Confederated Tribes of Siletz Indians
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of the Warm Springs Reservation of Oregon
- Coquille Indian Tribe
- Cow Creek Band of Umpqua Tribe of Indians
- Elk Valley Rancheria, California
- Elko Band of the Te-Moak Tribe of Western Shoshone Indians of Nevada
- Eastern Shoshone Tribe of the Wind River Reservation
- Fort Bidwell Indian Community of the Fort Bidwell Reservation of California
- Fort Independence Indian Reservation
- Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation, Nevada and Oregon
- Indians of Nevada (Four constituent bands: Battle Mountain Band; Elko Band; South Fork Band and Wells Band)
- Klamath Tribes
- Lone Pine Paiute Shoshone Tribe
- Modoc Nation
- Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada
- Pit River Tribe, California
- Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada
- Redding Rancheria
- Reno-Sparks Indian Colony, Nevada
- Resighini Rancheria, California
- Shoshone-Bannock Tribes of the Fort Hall Reservation
- Shoshone-Paiute Tribes of the Duck Valley Reservation, Nevada
- South Fork Band of the Te-Moak Tribe of Western Shoshone Indians of Nevada
- Summit Lake Paiute Tribe of Nevada
- Susanville Indian Rancheria
- Tolowa Dee-ni' Nation
- Utu Utu Gwaitu Paiute Tribe
- Walker River Paiute Tribe of the Walker River Reservation, Nevada
- Washoe Tribe of Nevada & California (Carson Colony, Dresslerville Colony, Woodfords Community, Stewart Community, & Washoe Ranches
- Wells Band of the Te-Moak Tribe of Western Shoshone Indians
- Winnemucca Indian Colony of Nevada
- Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada
- Yomba Shoshone Tribe of the Yomba Reservation, Nevada
- Yurok Tribe of the Yurok Reservation



The sample tribal letter for Invitation to Continue Government-to-Government Consultation for California following was distributed to the list below:

Betty Aleck, THPO, Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada, 208 Capitol Hill, Nixon NV 89424  
Patrick Burt, THPO, Washoe Tribe of Nevada & California (Carson Colony, Dresslerville Colony, Woodfords Community, Stewart Community, & Washoe Ranches), Highway 395 South, Gardnerville NV 89410  
Rose Clayburn, THPO, Yurok Tribe of the Yurok Reservation, PO Box 1027, Klamath CA 95548  
Kathy Dowd, THPO, Resighini Rancheria, California, PO Box 529, Klamath CA 95548  
Michon Eben, THPO, Reno-Sparks Indian Colony, Nevada, 98 Colony Rd, Reno NV 89502  
Cynthia Ford, THPO, Tolowa Dee-ni' Nation, 12801 Mouth of Smith River Rd, Smith River CA 95567  
Arian Hart, Chairperson, Susanville Indian Rancheria, 745 Joaquin St, Susanville CA 96130  
Ginny Hatch, Chairwoman, Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada, 171 Campbell Lane, Yerington NV 89447  
Linda Howard, Chairperson, Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada, 171 Campbell Lane, Yerington NV 89447  
Joseph James, Chairperson, Yurok Tribe of the Yurok Reservation, 190 Klamath Blvd, Klamath CA 95548  
Melany Johnson, THPO, Susanville Indian Rancheria, 745 Joaquin St, Susanville CA 96130  
Arlan Melendez, Chairperson, Reno-Sparks Indian Colony, Nevada, 34 Reservation Rd, Reno NV 89502  
Fawn Murphy, Chairperson, Resighini Rancheria, California, 158 E Klamath Beach Rd, Klamath CA 95548  
James Phoenix, Chairman, Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada, 208 Capitol Hill, Nixon NV 89424  
Jackie Potter, Jr., Chairman, Redding Rancheria, 2000 Redding Rancheria, Redding CA 96001  
Shane Saulque, Chairman, Utu Utu Gwaitu Paiute Tribe, 25669 Highway 6 PMBI, Benton CA 93512  
Serrell Smokey, Chairman, Washoe Tribe of Nevada & California (Carson Colony, Dresslerville Colony, Woodfords Community, Stewart Community, & Washoe Ranches), 919 US Highway 395 North, Gardnerville NV 89410  
Jeri Thompson, Chairperson, Tolowa Dee-ni' Nation, 12801 Mouth of Smith River Rd, Smith River CA 95567



**Sample California Tribal Letter**

**DEPARTMENT OF THE AIR FORCE  
173D FIGHTER WING  
KINGSLEY FIELD OREGON**

26 March 2025

Colonel Adam J. Gaudinski  
173 FW/CC  
211 Arnold Ave. Building A  
Klamath Falls OR 97603

Betty Aleck  
THPO  
Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada  
208 Capitol Hill  
Nixon, NV 89424

**SUBJECT: Invitation to Continue Government-to-Government Consultation Associated  
with the Kingsley Field F-35A Lightning II Beddown Environmental Impact Statement**

Dear Ms. Aleck

The National Guard Bureau (NGB) is proposing the beddown and operation of F-35A aircraft to replace the aging F-15C/D fleet at the 173rd Fighter Wing (173 FW), Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon (Attachment 1). This proposal also includes the necessary facility improvements and construction required to support the mission. The NGB has determined that the proposed Federal action is an undertaking as defined in 36 Code of Federal Regulations (CFR) Section 800.16(y) and it is a type of activity that has the potential to cause effects on historic properties.

NGB has prepared a Preliminary Draft Environmental Impact Statement (EIS) under the National Environmental Policy Act of 1969 (NEPA) to evaluate potential environmental effects associated with the proposed Federal action alternatives. The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

The NGB is conducting the environmental analysis for the undertaking in accordance with NEPA, as amended. The Preliminary Draft EIS is available upon request and the Draft EIS is expected to become available on the project website in July 2025 ([www.kingsleyfieldf35eis.com](http://www.kingsleyfieldf35eis.com)).

The NGB initiated consultation with your office on 13 June 2024. The purpose of this letter is to continue consultation pursuant to the terms of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations found at 36 CFR Section 800. This letter serves to identify historic properties within the Area of Potential Effects

(APE) for the undertaking and gauge project effects located within the bounds of the proposed undertaking.

### **The Proposed Undertaking**

The purpose of the proposed undertaking is to increase F-35A pilot production in support of the National Defense Strategy. The proposed undertaking would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission. This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this proposed undertaking; however, there could be an increase in operations within the airspace.

The beddown process would occur in phases associated with the manufacture and delivery of the F-35A aircraft. Delivery of the first aircraft to Kingsley Field would occur in Fiscal Year (FY) 2027. Delivery of the final aircraft would be expected in FY 2029, at which time the full complement of up to 24 Primary Aerospace Vehicle Authorized (PAA) (plus 2 Backup Aerospace Vehicle Authorized [BAA]) F-35A aircraft would be based at Kingsley Field.

To provide the training needed to ensure combat readiness, F-35A aircrews would conduct operations in two types of areas: (1) an airfield associated with the installation, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A would use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures.

### **The No Action Alternative**

Under the No Action Alternative, the 173 FW would continue to conduct their current mission using existing F-15C/D aircraft. Any construction and repair projects required for the current mission would be implemented. Implementation of the No Action Alternative would include the interior renovation of Buildings 130 and 302. It would include the interior renovation of Buildings 220, 221, and 234 if alternate options are chosen.

### **Area of Potential Effects (36 CFR Section 800.4(a)(1))**

An APE is defined in 36 CFR Section 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The NGB has reviewed the undertaking and defined the APE for the proposed undertaking specific to the state of California as the lands located beneath existing military training airspace from surface level to the ceiling of each airspace designation plus a 1-mile horizontal buffer. Attachment 1 includes a map of the APE.

#### **Identification of Listed Historic Properties (36 CFR Section 800.4(b))**

Information on cultural resources within the APE was derived from conducting background research using the National Register of Historic Places (NRHP) Information Database to identify NRHP-listed properties beneath the affected airspace that can include national historic landmarks, cultural landscapes, national monuments, historic trails, and historic battlefields within the same area.

Twenty-four listed historic properties are located on lands beneath the existing airspace associated with 173 FW in California (Attachment 2). The listed historic properties in California include 15 archaeological sites, a shipwreck, a light station, a lighthouse, Gasquet Ranger Station Historic District, a schoolhouse, a catholic church, a carpenter and paint shop associated with the Tule Lake Segregation Center, the Nevada-California-Oregon Railway Depot, and a Nevada-California-Oregon Railway general office building (National Park Service [NPS] 2024a, 2024b). Twelve California State Historic Landmarks are located beneath the military training airspace (see Attachment 2). These historic landmarks are titled: Applegate-Lassen Trail, Battery Point Lighthouse, Battle of Land's Ranch-1872, Brother Jonathan Cemetery, Camp Lincoln, Evans and Baily Fight, Fort Ter-Wer Site, Fremont's Camp, Indian Village Site, Infernal Caverns Battleground, Pioneer Stage Road to Oregon, and S.S. Emidio (NoeHill 2024).

NGB invited 44 federally recognized Tribal Nations who may cultural or historical ties to lands beneath the airspace to consult on this proposed undertaking. Of the 44 Tribal Nations, NGB received responses from 7 Tribal Nations. In accordance with Executive Order (EO) 13175, *Consultation and Coordination with Indian Tribal Governments*; EO 12372, *Intergovernmental Review of Federal Programs*; and Section 106 of the National Historic Preservation Act and its implementation regulations found at 36 CFR parts 800.2, 800.3, and 800.4, the 173 FW and NGB respectfully request your assistance in identifying the following:

- traditional resources or sacred sites that may be located within the current APE;
- historic properties in the APE of which we may not be aware; and/or
- your Tribe's interest in participating in additional consultation.

#### **Results of Identification and Evaluation (36 CFR Section 800.4(d))**

Because the proposed undertaking in California is an airspace action, only those historic properties that would reasonably be affected by visual (overflights, chaff and flares) and noise intrusions are considered. These include architectural resources, archaeological resources with standing buildings or structures, and traditional cultural properties and sacred sites.

Under the Proposed Action, the F-35A would use a very similar altitude profile as the F-15C/D in training; however, the F-35A would utilize altitudes above 20,000 feet mean sea level (MSL) 16 percent more than the F-15C/D currently does. The use of low altitudes (between 500 feet above ground level [AGL] and 10,000 feet MSL) would remain approximately the same as it currently is.

In general, noise from the F-35A would be 3 to 5 decibels (dB) greater in terms of sound exposure level (SEL) and 6 to 8 dB greater in maximum sound level ( $L_{max}$ ) when compared to the F-15C/D while operating in military power and 400 knots. The greatest Day-Night Average Sound Level (DNL)/Onset-Rate Adjusted Day-Night Average Sound Level ( $L_{dnmr}$ ) of 49 dB would occur in Juniper Low, Juniper East Low, Goose North, and Goose South Military Operations Areas (MOAs) due to a combination of an increase in operations in Goose and the lower airspace floor and lower altitudes in Juniper Low and Juniper East Low MOAs. The remainder of the Juniper and Hart complex outside of the Juniper Low and Juniper East Low areas would experience DNL/ $L_{dnmr}$  of 40 dB. The DNL/ $L_{dnmr}$  in Dolphin North and South MOA would be less than 35 dB due to the relatively small number of sorties spread over a large area with a minimum altitude of 11,000 feet MSL. Overall, there would be an increase in DNL/ $L_{dnmr}$  of 2 to 5 dB across the airspace, except Dolphin North and South MOAs that would experience a negligible change from the No Action Alternative. Based on noise level calculations for lands beneath the military training airspace, there would be no significant effects on archaeological resources, historic structures, or traditional cultural properties as a result of the implementation of the proposed undertaking.

Due to the high altitude of the overflights, small size of the aircraft, and the high speeds, the aircraft would not be readily visible to observers on the ground. Therefore, visual intrusions would be minimal and would not represent an increase sufficient to cause adverse effects on the settings of cultural resources.

No ground disturbance would occur under the airspace and use of ordnance and defensive countermeasures would occur in areas already used for these activities. The 173 FW would adhere to local operating procedures for chaff and flare release to include the Mountain Home Airspace and restricted airspace associated with the Saylor Creek Range (Department of the Air Force [DAF] 2023). Overall, flares are unlikely to adversely affect cultural resources. Therefore, the introduction of material to archaeological sites or standing structures from the use of flares would not have an adverse effect on these resources.

### **Conclusion**

Pursuant to 36 CFR Section 800.4(d)(1), the NGB has reached a preliminary determination of no historic properties affected for the proposed undertaking with respect to historic properties beneath the military training airspace. However, prior to finalizing our effects determination, we would like to solicit input regarding Tribal resources that may be present within the APE.

If you request additional consultation, the NGB and 173 FW will work with your office to adopt procedures that will meet your Tribe's needs and requirements for continued consultation.

In order for the NGB to address your concerns in a timely manner for both the Tribe and the proposed undertaking, please respond to this letter within thirty (30) days of receipt to J. Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at

[NGB.CCA4F.NEPACOMMENTSOrg@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTSOrg@us.af.mil) with the subject titled as ATTN: 173 FW EIS.  
We look forward to continuing consultation for the proposed undertaking, and we thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Gaudinski", with a red checkmark or flourish at the end.

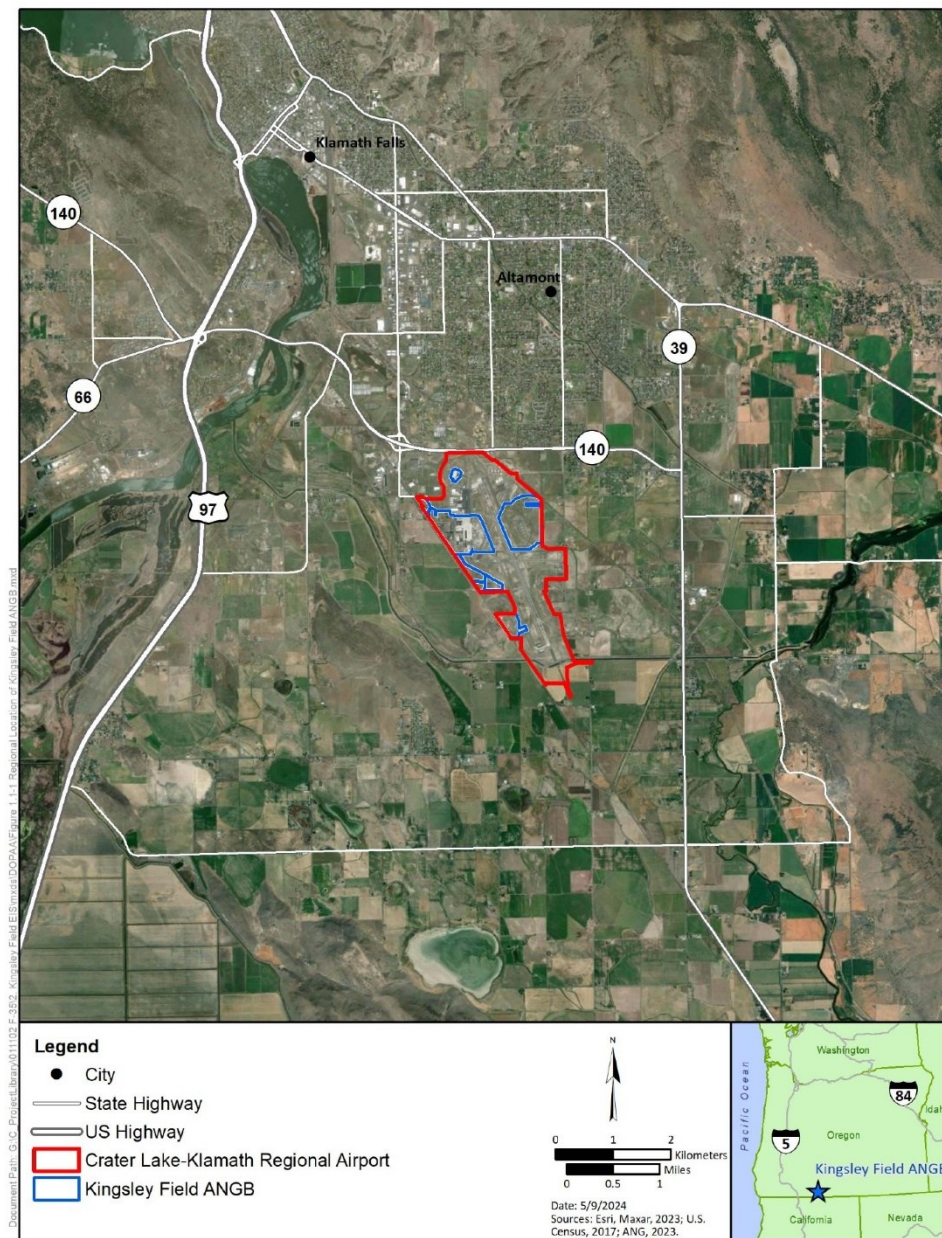
ADAM J. GAUDINSKI, Colonel, ORANG  
Commander, 173d Fighter Wing

Attachments:

1. Maps
2. Table of Historic Properties
3. References Cited



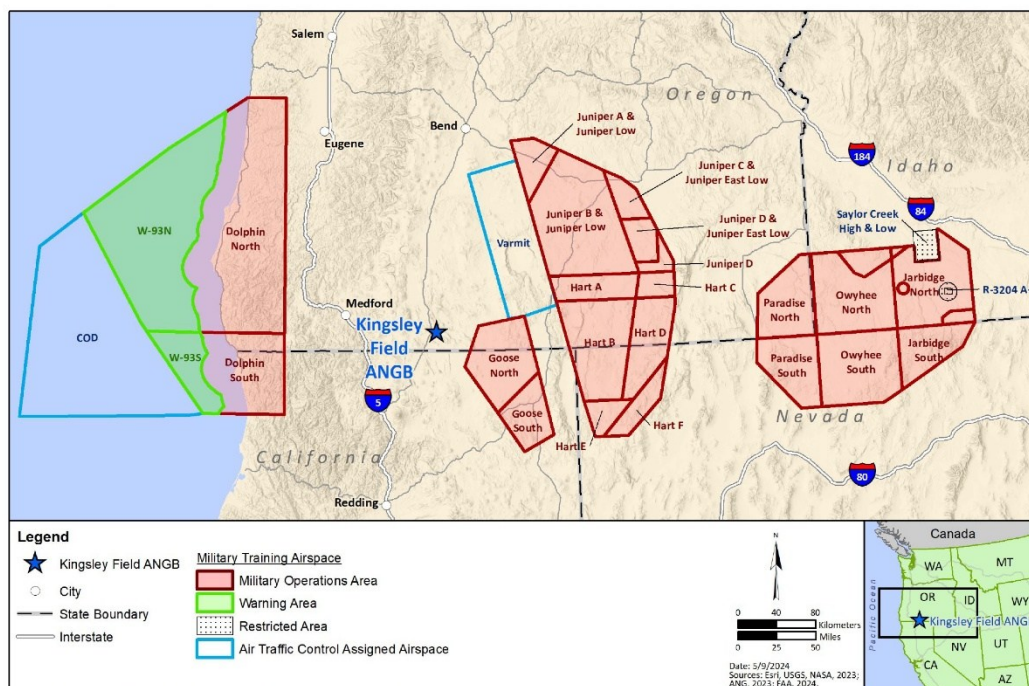
Attachment 1 - Regional Location Map of Kingsley Field ANGB





**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 - Kingsley Field ANGB Military Training Airspace



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Table of NRHP & State Listed Sites

| <b>Resource Name</b>                                         | <b>County</b> | <b>City</b>                    |
|--------------------------------------------------------------|---------------|--------------------------------|
| <i>Dolphin South MOA</i>                                     |               |                                |
| National Register Listed                                     |               |                                |
| Brother Jonathan (Shipwreck Site)                            | Del Norte     | Crescent City                  |
| Crescent City Lighthouse                                     | Del Norte     | Crescent City                  |
| Ender's Beach Archeological Sites                            | Del Norte     | Crescent City                  |
| Gasquet Ranger Station Historic District                     | Del Norte     | Gasquet                        |
| Mus-yeh-sait-neh Village and Cultural Landscape Property     | Del Norte     | Gasquet                        |
| Point St. George Site                                        | Del Norte     | Crescent City                  |
| St. George Reef Light Station                                | Del Norte     | Crescent City                  |
| Yontocket Historic District                                  | Del Norte     | Fort Dick                      |
| State Register Listed                                        |               |                                |
| Battery Point Lighthouse                                     | Del Norte     | Crescent City                  |
| Brother Jonathan Cemetery                                    | Del Norte     | Crescent City                  |
| Camp Lincoln                                                 | Del Norte     | Crescent City                  |
| Fort Ter-Wer Site                                            | Del Norte     | Klamath Glen                   |
| Indian Village Site                                          | Del Norte     | Crescent City                  |
| Pioneer State Road to Oregon                                 | Del Norte     | Crescent City                  |
| SS. Emidio                                                   | Del Norte     | Crescent City                  |
| <i>Goose South MOA</i>                                       |               |                                |
| National Register Listed                                     |               |                                |
| Anklin Village Archeological Site                            | Modoc         | Canby                          |
| Black Cow Spring                                             | Modoc         | Canby                          |
| Core Site                                                    | Modoc         | Canby                          |
| Cuppy Cave                                                   | Modoc         | Canby                          |
| Jess Valley Schoolhouse                                      | Modoc         | Likely                         |
| Mildred Ann Archeological Site                               | Modoc         | Canby                          |
| Nelson Springs                                               | Modoc         | Likely                         |
| Nevada-California-Oregon Railway Depot                       | Modoc         | Alturas                        |
| Nevada-California-Oregon Railway Co. General Office Building | Modoc         | Alturas                        |
| Sacred Heart Catholic Church                                 | Modoc         | Alturas                        |
| Seven Mile Flat Site                                         | Modoc         | Devil's Garden Ranger District |
| Skull Ridge                                                  | Modoc         | Canby                          |
| Skull Spring                                                 | Modoc         | Canby                          |
| State Register Listed                                        |               |                                |
| Applegate-Lassen Trail                                       | Modoc         | Fort Bidwell                   |
| Evans and Baily Fight                                        | Modoc         | Canby                          |
| Infernal Caverns Battleground                                | Modoc         | Likely                         |
| Battle of Land's Ranch- 1872                                 | Modoc         | Tulelake                       |
| <i>Goose North MOA</i>                                       |               |                                |

Attachment 2 – Table of NRHP & State Listed Sites

| <b><i>Resource Name</i></b>                                     | <b><i>County</i></b> | <b><i>City</i></b> |
|-----------------------------------------------------------------|----------------------|--------------------|
| National Register Listed                                        |                      |                    |
| Carpenter and Paint Shop (Part of Tule Lake Segregation Center) | Modoc                | Newell             |
| Fern Cave Archeological Site*                                   | Modoc                | Tule Lake          |
| Petroglyph Point Archeological Site*                            | Modoc                | Tule Lake          |
| State Register Listed                                           |                      |                    |
| Fremont's Camp                                                  | Modoc                | Tule Lake          |

*Notes:* \*Possibly located within Goose North MOA; address is restricted so we cannot be 100% certain that this site is located beneath the airspace.

Attachment 3 – References Cited

Department of the Air Force (DAF)

2023    Airspace Optimization for Readiness EIS for Mountain Home AFB.

National Park Service (NPS)

2024a   National Register of Historic Places Spatial Data. Last updated 19 April 2024.

2024b   National Register of Historic Places Spreadsheet of Everything. Last updated 10 July 2024.

NoeHill

2024    List of State Historic Landmarks and Points of Interest. Accessed June 19, 2024 at:

<https://noehill.com/sitemap.asp>.

The sample tribal letter for Invitation to Continue Government-to-Government Consultation for Idaho following was distributed to the list below:

Robert Brunoe, THPO, Confederated Tribes of the Warm Springs Reservation of Oregon, PO Box C,  
Warm Springs OR 97761  
Brian Mason, Tribal Chairman, Shoshone-Paiute Tribes of the Duck Valley Reservation, Nevada, 1036  
Idaho State Highway 51, PO Box 219, Owyhee NV 89832-0219  
Carolyn Smith, Cultural Resources Coordinator, Shoshone-Bannock Tribes of the Fort Hall Reservation,  
PO Box 306, Fort Hall ID 83203  
Jonathan Smith, Chairman, Confederated Tribes of the Warm Springs Reservation of Oregon, 1233  
Veterans St, Warm Springs OR 97761  
Lee Tyler, Chairman, Shoshone-Bannock Tribes of the Fort Hall Reservation, Agency Building 82, 1  
Pima Dr, Fort Hall ID 83203



**Sample Tribal Letter Idaho**  
**DEPARTMENT OF THE AIR FORCE**  
**173D FIGHTER WING**  
**KINGSLEY FIELD OREGON**

26 March 2025

Colonel Adam J. Gaudinski  
173 FW/CC  
211 Arnold Ave. Building A  
Klamath Falls OR 97603

Robert Brunoe  
Tribal Historic Preservation Officer  
Confederated Tribes of the Warm Springs Reservation of Oregon  
P.O. Box C  
Warm Springs, OR 97761

**SUBJECT: Invitation to Continue Government-to-Government Consultation Associated  
with the Kingsley Field F-35A Lightning II Beddown Environmental Impact Statement**

Dear Mr. Brunoe

The National Guard Bureau (NGB) is proposing the beddown and operation of F-35A aircraft to replace the aging F-15C/D fleet at the 173rd Fighter Wing (173 FW), Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon (Attachment 1). This proposal also includes the necessary facility improvements and construction required to support the mission. The NGB has determined that the proposed Federal action is an undertaking as defined in 36 Code of Federal Regulations (CFR) Section 800.16(y) and it is a type of activity that has the potential to cause effects on historic properties.

NGB has prepared a Preliminary Draft Environmental Impact Statement (EIS) under the National Environmental Policy Act of 1969 (NEPA), as amended to evaluate potential environmental effects associated with the proposed Federal action alternatives. The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

The NGB is conducting the environmental analysis for the undertaking in accordance with NEPA, as amended. The Preliminary Draft EIS is available upon request and the Draft EIS is expected to become available on the project website in July 2025 ([www.kingsleyfieldf35eis.com](http://www.kingsleyfieldf35eis.com)).

The NGB initiated consultation with your office on 13 June 2024. The purpose of this letter is to continue consultation pursuant to the terms of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations found at 36 CFR Section 800. This letter serves to identify historic properties within the Area of Potential Effects

(APE) for the undertaking and gauge project effects located within the bounds of the proposed undertaking.

### **The Proposed Undertaking**

The purpose of the proposed undertaking is to increase F-35A pilot production in support of the National Defense Strategy. The proposed undertaking would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission. This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this proposed undertaking; however, there could be an increase in operations within the airspace.

The beddown process would occur in phases associated with the manufacture and delivery of the F-35A aircraft. Delivery of the first aircraft to Kingsley Field would occur in Fiscal Year (FY) 2027. Delivery of the final aircraft would be expected in FY 2029, at which time the full complement of up to 24 Primary Aerospace Vehicle Authorized (PAA) (plus 2 Backup Aerospace Vehicle Authorized [BAA]) F-35A aircraft would be based at Kingsley Field.

To provide the training needed to ensure combat readiness, F-35A aircrews would conduct operations in two types of areas: (1) an airfield associated with an installation, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A would use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures.

### **The No Action Alternative**

Under the No Action Alternative, the 173 FW would continue to conduct their current mission using existing F-15C/D aircraft. Any construction and repair projects required for the current mission would be implemented. Implementation of the No Action Alternative would include the interior renovation of Buildings 130 and 302. It would include the interior renovation of Buildings 220, 221, and 234 if alternate options are chosen.

### **Area of Potential Effects (36 CFR Section 800.4(a)(1))**

An APE is defined in 36 CFR Section 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The NGB has reviewed the undertaking and defined the APE for the proposed undertaking specific to the state of Idaho as the lands located beneath existing military training airspace from surface level to the ceiling of each airspace designation plus a 1-mile horizontal buffer. Attachment 1 includes a map of the APE.



**Identification of Listed Historic Properties (36 CFR Section 800.4(b))**

Information on cultural resources within the APE was derived from conducting background research using the National Register of Historic Places (NRHP) Information Database to identify NRHP-listed properties beneath the affected airspace that can include national historic landmarks, cultural landscapes, national monuments, historic trails, and historic battlefields within the same area.

Three listed historic properties are located on lands beneath the existing airspace associated with 173 FW in Idaho. These listed historic properties include the Wickahoney Post Office and Stage Station, Camp Three Forks, and the Camas and Pole Creeks Archaeological District (National Park Service [NPS] 2024a, 2024b). Idaho does not have a State Register of Historic Places.

NGB invited 44 federally recognized Tribal Nations who may cultural or historical ties to lands beneath the airspace to consult on this proposed undertaking. Of the 44 Tribal Nations, NGB received responses from 7 Tribal Nations. In accordance with Executive Order (EO) 13175, *Consultation and Coordination with Indian Tribal Governments*; EO 12372, *Intergovernmental Review of Federal Programs*; and Section 106 of the National Historic Preservation Act and its implementation regulations found at 36 CFR parts 800.2, 800.3, and 800.4, the 173 FW and NGB respectfully request your assistance in identifying the following:

- traditional resources or sacred sites that may be located within the current APE;
- historic properties in the APE of which we may not be aware; and/or
- your Tribe's interest in participating in additional consultation.

**Results of Identification and Evaluation (36 CFR Section 800.4(d))**

Because the proposed undertaking in Idaho is an airspace action, only those historic properties that would reasonably be affected by visual (overflights, chaff and flares) and noise intrusions are considered. These include architectural resources, archaeological resources with standing buildings or structures, and traditional cultural properties.

Under the Proposed Action, the F-35A would use a very similar altitude profile as the F-15C/D in training; however, the F-35A would utilize altitudes above 20,000 feet mean sea level (MSL) 16 percent more than the F-15C/D currently does. The use of low altitudes (between 500 feet above ground level [AGL] and 10,000 feet MSL) would remain approximately the same as it currently is.

In general, noise from the F-35A would be 3 to 5 decibels (dB) greater in terms of sound exposure level (SEL) and 6 to 8 dB greater in maximum sound level ( $L_{max}$ ) when compared to the F-15C/D while operating in military power and 400 knots. Overall, there would be an increase in Day-Night Average Sound Level (DNL)/Onset-Rate Adjusted Day-Night Average Sound Level ( $L_{dnmr}$ ) of 2 to 5 dB across the airspace. Based on noise level calculations for lands beneath the military training airspace, there would be no significant effects on archaeological resources, historic structures, or traditional cultural properties as a result of the implementation of the proposed undertaking.

Due to the high altitude of the overflights, small size of the aircraft, and the high speeds, the aircraft would not be readily visible to observers on the ground. Therefore, visual intrusions would be minimal and would not represent an increase sufficient to cause adverse effects on the settings of cultural resources.

No additional ground disturbance would occur under the airspace and use of ordnance and defensive countermeasures would occur in areas already used for these activities. The 173 FW would adhere to local operating procedures for chaff and flare release to include the Mountain Home Airspace and restricted airspace associated with the Saylor Creek Range (Department of the Air Force [DAF] 2023). Overall, flares are unlikely to adversely affect cultural resources. Therefore, the introduction of material to archaeological sites or standing structures from the use of flares would not have an adverse effect on these resources.

### **Conclusion**

Pursuant to 36 CFR Section 800.4(d)(1), the NGB has reached a preliminary determination of no historic properties affected for the proposed undertaking with respect to historic properties beneath the military training airspace. However, prior to finalizing our effects determination, we would like to solicit input regarding Tribal resources that may be present within the APE.

If you request additional consultation, the NGB and 173 FW will work with your office to adopt procedures that will meet your Tribe's needs and requirements for continued consultation.

In order for the NGB to address your concerns in a timely manner for both the Tribe and the proposed undertaking, please respond to this letter within thirty (30) days of receipt to J. Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [NGB.CCA4F.NEPACOMMENTS@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTS@us.af.mil) with the subject titled as ATTN: 173 FW EIS. We look forward to continuing consultation for the proposed undertaking, and we thank you for your assistance.

Sincerely,

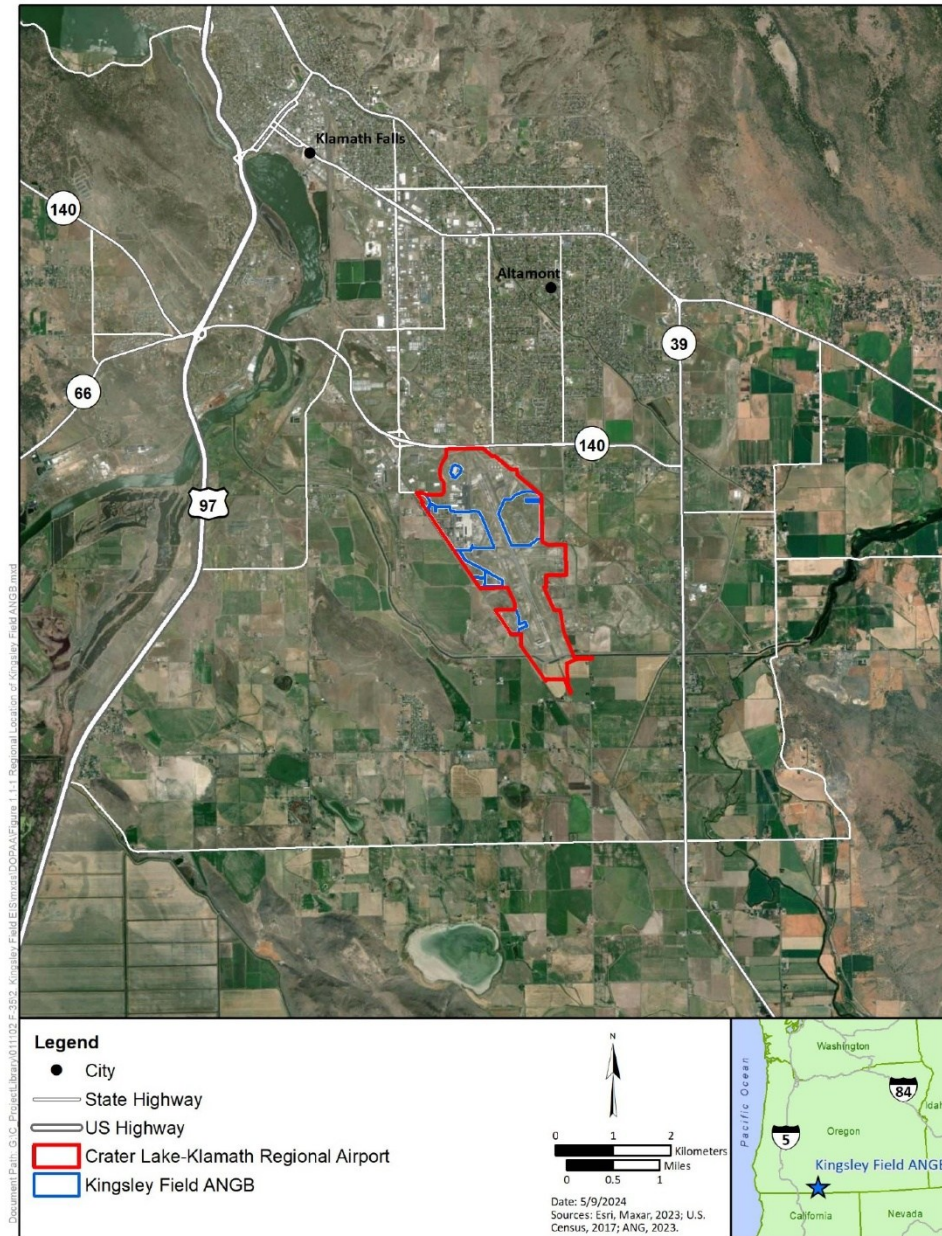


ADAM J. GAUDINSKI, Colonel, ORANG  
Commander, 173d Fighter Wing

Attachments:

1. Maps
2. References Cited

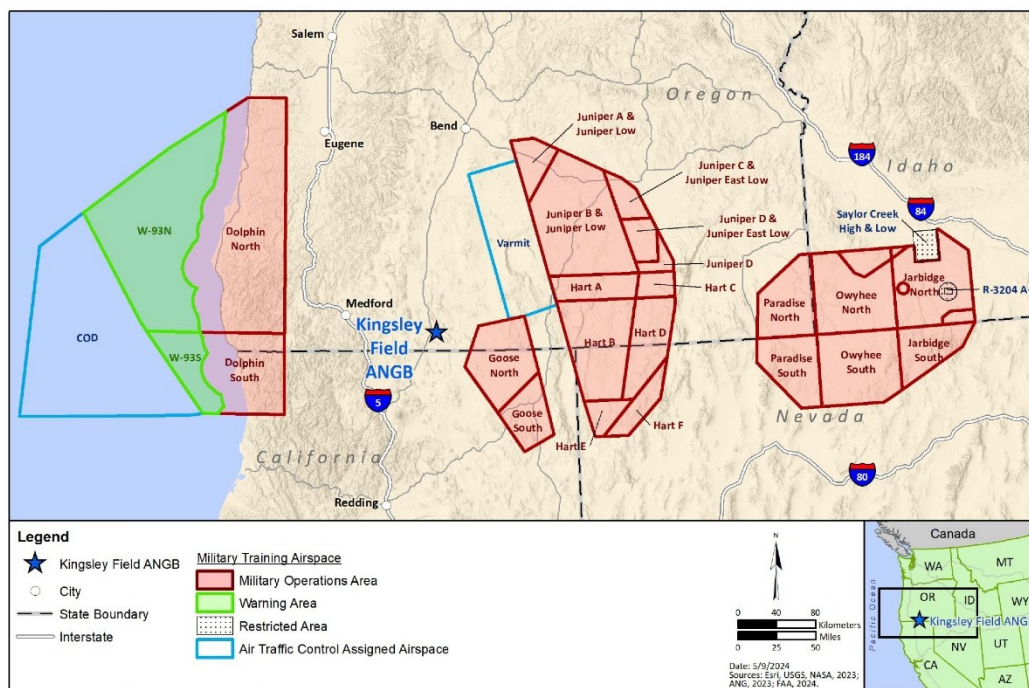
Attachment 1 - Regional Location Map of Kingsley Field ANGB





**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 - Kingsley Field ANGB Military Training Airspace



Attachment 2 – References Cited

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2024a   National Register of Historic Places Spatial Data. Last updated 19 April 2024.

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The sample tribal letter for Invitation to Continue Government-to-Government Consultation for Nevada following was distributed to the list below:

Betty Aleck, THPO, Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada, 208 Capitol Hill, Nixon NV 89424  
Yatch Bamford, Chairman, Pit River Tribe, California, 36970 Park Ave, Burney CA 96013  
Gracie Begay, Chairwoman, Wells Band of the Te-Moak Tribe of Western Shoshone Indians, PO Box 809, Wells NV 89835  
Darryl Brady, Chairman, Yomba Shoshone Tribe of the Yomba Reservation, Nevada, HC 61, Box 6275, Austin NV 89310  
Robert Brunoe, THPO, Confederated Tribes of the Warm Springs Reservation of Oregon, PO Box C, Warm Springs OR 97761  
Patrick Burt, THPO, Washoe Tribe of Nevada & California (Carson Colony, Dresslerville Colony, Woodfords Community, Stewart Community, & Washoe Ranches), Highway 395 South, Gardnerville NV 89410  
Arlo Crutcher, Chairman, Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation, Nevada and Oregon, 111 N Reservation Rd, McDermitt NV 89421  
Kathy Dowd, THPO, Resighini Rancheria, California, PO Box 529, Klamath CA 95548  
Michon Eben, THPO, Reno-Sparks Indian Colony, Nevada, 98 Colony Rd, Reno NV 89502  
Natalie Forrest-Perez, Interim THPO, Pit River Tribe, California, 36970 Park Ave, Burney CA 96013  
Len George, Chairperson, Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada, 565 Rio Vista Drive, Fallon NV 89406-6415  
Davis Gonzales, Chairperson, Indians of Nevada (Four constituent bands: Battle Mountain Band; Elko Band; South Fork Band and Wells Band), 525 Sunset St, Elko NV 89801  
Ginny Hatch, Chairwoman, Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada, 171 Campbell Lane, Yerington NV 89447  
Joseph Holley, Chairman, South Fork Band of the Te-Moak Tribe of Western Shoshone Indians of Nevada, 525 Sunset St, Elko NV 89801  
Linda Howard, Chairperson, Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada, 171 Campbell Lane, Yerington NV 89447  
Randi Lone Eagle, Chairwoman and THPO, Summit Lake Paiute Tribe of Nevada, 2255 Green Vista Dr, Ste 402, Sparks NV 89431  
Eric Magiera, Chairman, Winnemucca Indian Colony of Nevada, 200 South Virginia Street, 8<sup>th</sup> Floor Winnemucca NV 89501  
Joshua Mann, THPO, Eastern Shoshone Tribe of the Wind River Reservation, PO Box 538, Fort Washakie WY 82514  
Andrea Martinez, Chairwoman, Walker River Paiute Tribe of the Walker River Reservation, Nevada, PO Box 220, Schurz NV 89427-0220  
Brian Mason, Tribal Chairman, Shoshone-Paiute Tribes of the Duck Valley Reservation, Nevada, 1036 Idaho State Highway 51, PO Box 219, Owyhee NV 89832-0219  
Arlan Melendez, Chairperson, Reno-Sparks Indian Colony, Nevada, 34 Reservation Rd, Reno NV 89502  
Amos Murphy, Chairman, Confederated Tribes of Goshute Reservation, Nevada and Utah, HC 61, Box 6104, Ibapah UT 84034  
James Phoenix, Chairman, Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada, 208 Capitol Hill, Nixon NV 89424  
Linzey Scott, Acting THPO, Walker River Paiute Tribe of the Walker River Reservation, Nevada, PO Box 220, Schurz NV 89427-0220  
Leilah Shephard, THPO, Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada, 565 Rio Vista Dr, Fallon NV 89406-6415

Carolyn Smith, Cultural Resources Coordinator, Shoshone-Bannock Tribes of the Fort Hall Reservation,  
PO Box 306. Fort Hall ID 83203

Jonathan Smith, Chairman, Confederated Tribes of the Warm Springs Reservation of Oregon, 1233  
Veterans St, Warm Springs OR 97761

Serrell Smokey, Chairman, Washoe Tribe of Nevada & California (Carson Colony, Dresslerville Colony,  
Woodfords Community, Stewart Community, & Washoe Ranches), 919 US Highway 395 North,  
Gardnerville NV 89410

John St. Clair, Chairman, Eastern Shoshone Tribe of the Wind River Reservation, PO Box 538, Fort  
Washakie WY 82514

Gerald Temoke, Chairperson, Elko Band of the Te-Moak Tribe of Western Shoshone Indians of Nevada,  
1745 Silver Eagle Dr, Elko NV 89801

Lee Tyler, Chairman, Shoshone-Bannock Tribes of the Fort Hall Reservation, Agency Building 82, 1  
Pima Dr, Fort Hall ID 83203

Catherine Williams-Tuni, Chairwoman, Paiute-Shoshone Tribe of the Fallon Reservation and Colony,  
Nevada, 565 Rio Vista Dr, Fallon NV 89406-6415





**Sample Tribal Letter Nevada  
DEPARTMENT OF THE AIR FORCE  
173D FIGHTER WING  
KINGSLEY FIELD OREGON**

26 March 2025

Colonel Adam J. Gaudinski  
173 FW/CC  
211 Arnold Ave. Building A  
Klamath Falls OR 97603

Amos Murphy  
Chairman  
Confederated Tribes of the Goshute Reservation, Nevada and Utah  
HC 61, Box 6104  
Ibapah, UT 84034

**SUBJECT: Invitation to Continue Government-to-Government Consultation Associated  
with the Kingsley Field F-35A Lightning II Beddown Environmental Impact Statement**

Dear Chairman Murphy

The National Guard Bureau (NGB) is proposing the beddown and operation of F-35A aircraft to replace the aging F-15C/D fleet at the 173rd Fighter Wing (173 FW), Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon (Attachment 1). This proposal also includes the necessary facility improvements and construction required to support the mission. The NGB has determined that the proposed Federal action is an undertaking as defined in 36 Code of Federal Regulations (CFR) Section 800.16(y) and it is a type of activity that has the potential to cause effects on historic properties.

NGB has prepared a Preliminary Draft Environmental Impact Statement (EIS) under the National Environmental Policy Act of 1969 (NEPA) to evaluate potential environmental effects associated with the proposed Federal action alternatives. The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

The NGB is conducting the environmental analysis for the undertaking in accordance with NEPA, as amended. The Preliminary Draft EIS is available upon request and the Draft EIS is expected to become available on the project website in July 2025 ([www.kingsleyfieldf35eis.com](http://www.kingsleyfieldf35eis.com)).

The NGB initiated consultation with your office on 13 June 2024. The purpose of this letter is to continue consultation pursuant to the terms of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations found at 36 CFR Section 800. This letter serves to identify historic properties within the Area of Potential Effects

(APE) for the undertaking and gauge project effects located within the bounds of the proposed undertaking.

### **The Proposed Undertaking**

The purpose of the proposed undertaking is to increase F-35A pilot production in support of the National Defense Strategy. The proposed undertaking would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission. This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this proposed undertaking; however, there could be an increase in operations within the airspace.

The beddown process would occur in phases associated with the manufacture and delivery of the F-35A aircraft. Delivery of the first aircraft to Kingsley Field would occur in Fiscal Year (FY) 2027. Delivery of the final aircraft would be expected in FY 2029, at which time the full complement of up to 24 Primary Aerospace Vehicle Authorized (PAA) (plus 2 Backup Aerospace Vehicle Authorized [BAA]) F-35A aircraft would be based at Kingsley Field.

To provide the training needed to ensure combat readiness, F-35A aircrews would conduct operations in two types of areas: (1) an airfield associated with an installation, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A would use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures.

### **The No Action Alternative**

Under the No Action Alternative, the 173 FW would continue to conduct their current mission using existing F-15C/D aircraft. Any construction and repair projects required for the current mission would be implemented. Implementation of the No Action Alternative would include the interior renovation of Buildings 130 and 302. It would include the interior renovation of Buildings 220, 221, and 234 if alternate options are chosen.

### **Area of Potential Effects (36 CFR Section 800.4(a)(1))**

An APE is defined in 36 CFR Section 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The NGB has reviewed the undertaking and defined the APE for the proposed undertaking specific to the state of Nevada as the lands located beneath existing military training airspace from surface level to the ceiling of each airspace designation plus a 1-mile horizontal buffer. Attachment 1 includes a map of the APE.

#### **Identification of Listed Historic Properties (36 CFR Section 800.4(b))**

Information on cultural resources within the APE was derived from conducting background research using the National Register of Historic Places (NRHP) Information Database to identify NRHP-listed properties beneath the affected airspace that can include national historic landmarks, cultural landscapes, national monuments, historic trails, and historic battlefields within the same area.

Three listed historic properties are located on lands beneath the existing airspace associated with 173 FW in Nevada. The three listed historic properties include Gold Creek Ranger Station, Silver State Flour Mill, and the Applegate-Lassen Trail. The Applegate-Lassen Trail is located beneath three military training airspace units (Hart B Military Operations Area [MOA], Hart E MOA, and Hart F MOA) (National Park Service [NPS] 2024a, 2024b). Four Nevada State Historic Landmarks are located beneath the military training airspace. These historic landmarks are titled: Camp McGarry, Town of Jarbidge, Jarbidge Community Hall, and Fort McDermitt (NoeHill 2024).

NGB invited 44 federally recognized Tribal Nations who may cultural or historical ties to lands beneath the airspace to consult on this proposed undertaking. Of the 44 Tribal Nations, NGB received responses from 7 Tribal Nations. In accordance with Executive Order (EO) 13175, *Consultation and Coordination with Indian Tribal Governments*; EO 12372, *Intergovernmental Review of Federal Programs*; and Section 106 of the National Historic Preservation Act and its implementation regulations found at 36 CFR parts 800.2, 800.3, and 800.4, the 173 FW and NGB respectfully request your assistance in identifying the following:

- traditional resources or sacred sites that may be located within the current APE;
- historic properties in the APE of which we may not be aware; and/or
- your Tribe's interest in participating in additional consultation.

#### **Results of Identification and Evaluation (36 CFR Section 800.4(d))**

Because the proposed undertaking in Nevada is an airspace action, only those historic properties that would reasonably be affected by visual (overflights, chaff and flares) and noise intrusions are considered. These include architectural resources, archaeological resources with standing buildings or structures, and traditional cultural properties.

Under the Proposed Action, the F-35A would use a very similar altitude profile as the F-15C/D in training; however, the F-35A would utilize altitudes above 20,000 feet mean sea level (MSL) 16 percent more than the F-15C/D currently does. The use of low altitudes (between 500 feet above ground level [AGL] and 10,000 feet MSL) would remain approximately the same as it currently is.

In general, noise from the F-35A would be 3 to 5 decibels (dB) greater in terms of sound exposure level (SEL) and 6 to 8 dB greater in maximum sound level ( $L_{max}$ ) when compared to the F-15C/D while operating in military power and 400 knots. Overall, there would be an increase in Day-Night Average Sound Level (DNL)/Onset-Rate Adjusted Day-Night Average Sound Level ( $L_{dnmr}$ ) of 2 to 5 dB across the airspace. Based on noise level calculations for lands beneath the military training airspace, there would be no significant effects on archaeological

resources, historic structures, or traditional cultural properties as a result of the implementation of the proposed undertaking.

Due to the high altitude of the overflights, small size of the aircraft, and the high speeds, the aircraft would not be readily visible to observers on the ground. Therefore, visual intrusions would be minimal and would not represent an increase sufficient to cause adverse effects on the settings of cultural resources.

No additional ground disturbance would occur under the airspace and use of ordnance and defensive countermeasures would occur in areas already used for these activities. The 173 FW would adhere to local operating procedures for chaff and flare release to include the Mountain Home Airspace and restricted airspace associated with the Saylor Creek Range (Department of the Air Force [DAF] 2023). Overall, flares are unlikely to adversely affect cultural resources. Therefore, the introduction of material to archaeological sites or standing structures from the use of flares would not have an adverse effect on these resources.

### **Conclusion**

Pursuant to 36 CFR Section 800.4(d)(1), the NGB has reached a preliminary determination of no historic properties affected for the proposed undertaking with respect to historic properties beneath the military training airspace. However, prior to finalizing our effects determination, we would like to solicit input regarding Tribal resources that may be present within the APE.

If you request additional consultation, the NGB and 173 FW will work with your office to adopt procedures that will meet your Tribe's needs and requirements for continued consultation.

In order for the NGB to address your concerns in a timely manner for both the Tribe and the proposed undertaking, please respond to this letter within thirty (30) days of receipt to J. Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil](mailto:NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil) with the subject titled as ATTN: 173 FW EIS. We look forward to continuing consultation for the proposed undertaking, and we thank you for your assistance.

Sincerely,



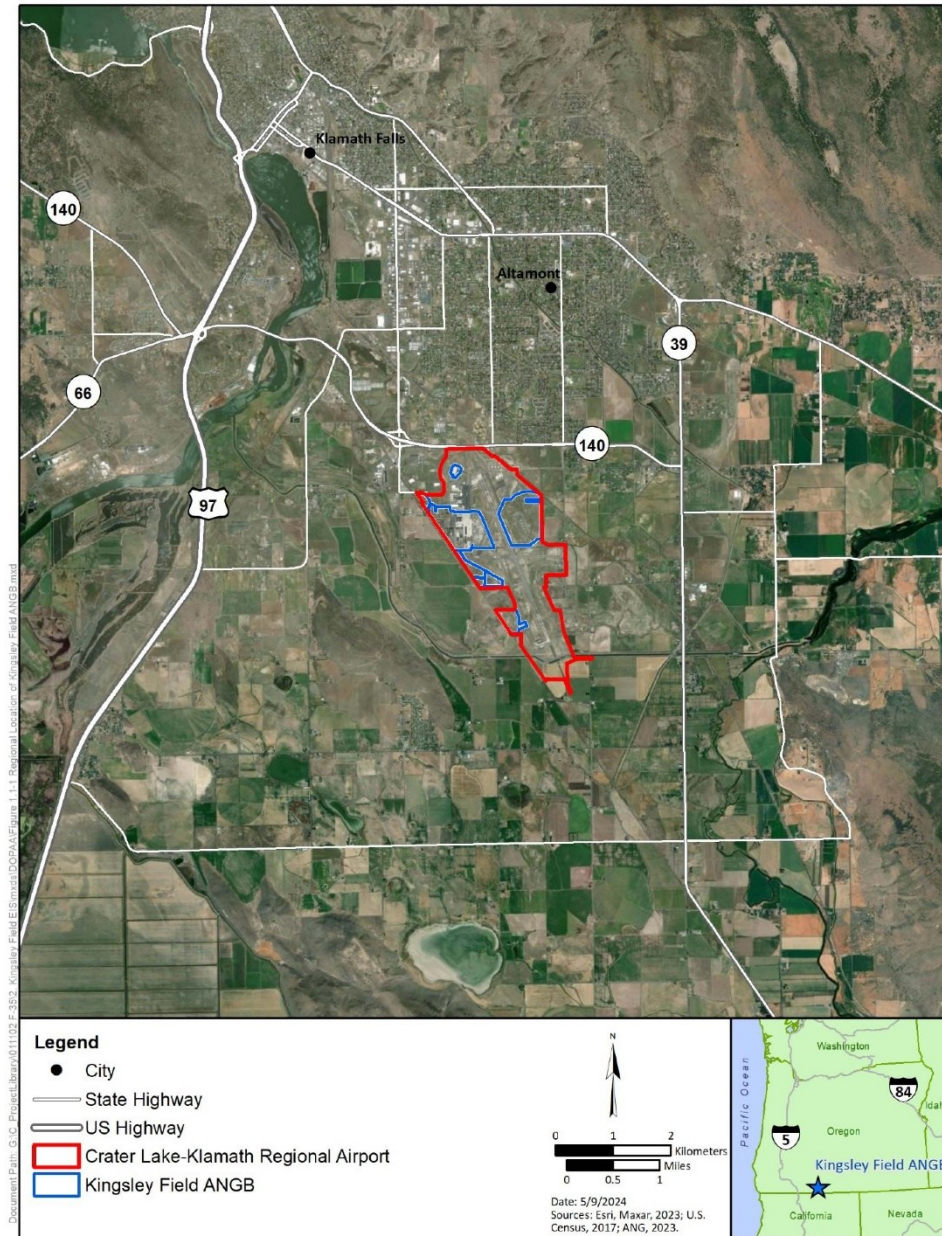
ADAM J. GAUDINSKI, Colonel, ORANG  
Commander, 173d Fighter Wing

Attachments:

1. Maps
2. References Cited

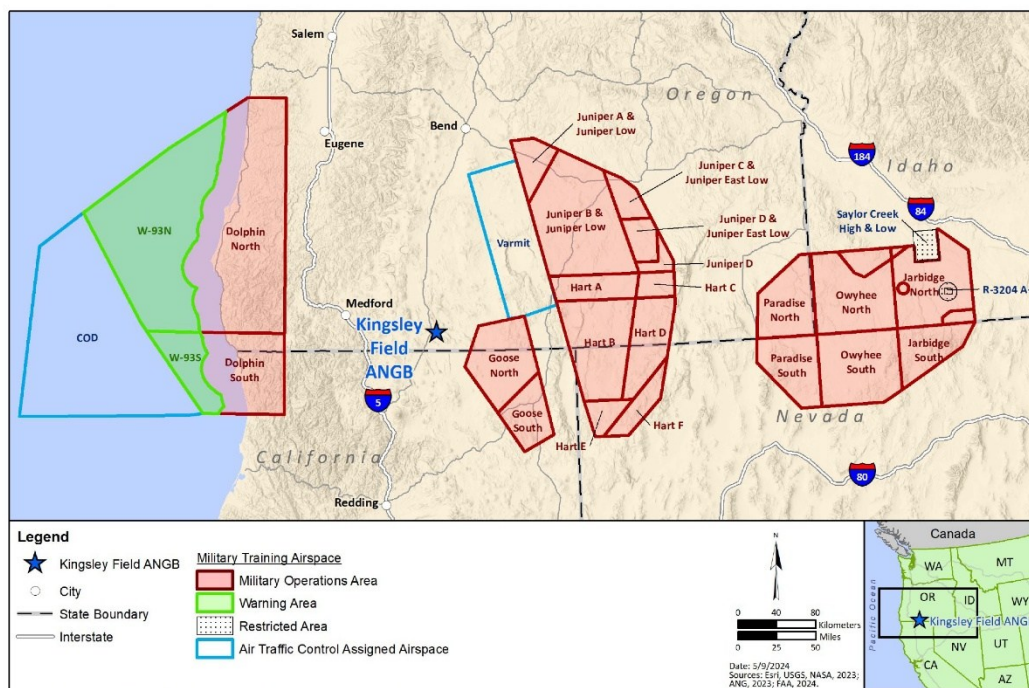


Attachment 1 - Regional Location Map of Kingsley Field ANGB



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 - Kingsley Field ANGB Military Training Airspace



Attachment 2 – References Cited

Department of the Air Force (DAF)

2023    Airspace Optimization for Readiness EIS for Mountain Home AFB.

National Park Service (NPS)

2024a   National Register of Historic Places Spatial Data. Last updated 19 April 2024.

2024b   National Register of Historic Places Spreadsheet of Everything. Last updated 10 July 2024.

NoeHill

2024    List of State Historic Landmarks and Points of Interest. Accessed June 19, 2024 at:

<https://noehill.com/sitemap.asp>.



The sample tribal letter for Invitation to Continue Government-to-Government Consultation for Oregon following was distributed to the list below:

Betty Aleck, THPO, Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada, 208 Capitol Hill, Nixon NV 89424  
Yatch Bamford, Chairman, Pit River Tribe, California, 36970 Park Ave, Burney CA 96013  
Doug Barrett, Chief, Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, 1245 Fulton Ave, Coos Bay OR 97420  
Alan Crawford, Chairman, Confederated Tribes of the Umatilla Indian Reservation, Nixyaawii Governance Center, 46411 Timine Way, Pendleton OR 97801  
Arlo Crutcher, Chairman, Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation, Nevada and Oregon, 111 N Reservation Rd, McDermitt NV 89421  
Kathy Dowd, THPO, Resighini Rancheria, California, PO Box 529, Klamath CA 95548  
Michon Eben, THPO, Reno-Sparks Indian Colony, Nevada, 98 Colony Rd, Reno NV 89502  
Natalie Forrest-Perez, Interim THPO, Pit River Tribe, California, 36970 Park Ave, Burney CA 96013  
Len George, Chairperson, Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada, 565 Rio Vista Drive, Fallon NV 89406-6415  
Ginny Hatch, Chairwoman, Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada, 171 Campbell Lane, Yerington NV 89447  
Linda Howard, Chairperson, Yerington Paiute Tribe of the Yerington Colony and Campbell Ranch, Nevada, 171 Campbell Lane, Yerington NV 89447  
Courtney Krossman, THPO, Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, 1245 Fulton Ave, Coos Bay OR 97420  
Andrea Martinez, Chairwoman, Walker River Paiute Tribe of the Walker River Reservation, Nevada, PO Box 220, Schurz NV 89427-0220  
Brian Mason, Tribal Chairman, Shoshone-Paiute Tribes of the Duck Valley Reservation, Nevada, 1036 Idaho State Highway 51, PO Box 219, Owyhee NV 89832-0219  
Arlan Melendez, Chairperson, Reno-Sparks Indian Colony, Nevada, 34 Reservation Rd, Reno NV 89502  
Carey Miller, THPO, Confederated Tribes of the Umatilla Indian Reservation, Nixyaawii Governance Center, 46411 Timine Way, Pendleton OR 97801  
James Phoenix, Chairman, Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada, 208 Capitol Hill, Nixon NV 89424  
Linzey Scott, Acting THPO, Walker River Paiute Tribe of the Walker River Reservation, Nevada, PO Box 220, Schurz NV 89427-0220  
Leilah Shephard, THPO, Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada, 565 Rio Vista Dr, Fallon NV 89406-6415  
Charisse Soucie, THPO, Burns Paiute Tribe, 100 Pasigo St, Burns OR 97720  
Diane L. Teeman, Chairperson, Burns Paiute Tribe, 100 Pasigo St, Burns OR 97720  
Catherine Williams-Tuni, Chairwoman, Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada, 565 Rio Vista Dr, Fallon NV 89406-6415



**Sample Tribal Letter Oregon  
DEPARTMENT OF THE AIR FORCE  
173D FIGHTER WING  
KINGSLEY FIELD OREGON**

26 March 2025

Colonel Adam J. Gaudinski  
173 FW/CC  
211 Arnold Ave. Building A  
Klamath Falls OR 97603

Charisse Soucie  
THPO  
Burns Paiute Tribe  
100 Pasigo St.  
Burns, OR 97720

**SUBJECT: Invitation to Continue Government-to-Government Consultation Associated  
with the Kingsley Field F-35A Lightning II Beddown Environmental Impact Statement**

Dear Ms. Soucie

The National Guard Bureau (NGB) is proposing the beddown and operation of F-35A aircraft to replace the aging F-15C/D fleet at the 173rd Fighter Wing (173 FW), Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon (Attachment 1). This proposal also includes the necessary facility improvements and construction required to support the mission. The NGB has determined that the proposed Federal action is an undertaking as defined in 36 Code of Federal Regulations (CFR) Section 800.16(y) and it is a type of activity that has the potential to cause effects on historic properties.

NGB has prepared a Preliminary Draft Environmental Impact Statement (EIS) under the National Environmental Policy Act of 1969 (NEPA), as amended to evaluate potential environmental effects associated with the proposed Federal action alternatives. The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

The NGB is conducting the environmental analysis for the undertaking in accordance with the NEPA, as amended. The Preliminary Draft EIS is available upon request and the Draft EIS is expected to become available on the project website in July 2025 ([www.kingsleyfieldf35eis.com](http://www.kingsleyfieldf35eis.com)).

The NGB initiated consultation with your office on 13 June 2024. The purpose of this letter is to continue consultation pursuant to the terms of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations found at 36 CFR Section 800. This letter serves to identify historic properties within the Area of Potential Effects

(APE) for the undertaking and gauge project effects located within the bounds of the proposed undertaking.

### **The Proposed Undertaking**

The purpose of the proposed undertaking is to increase F-35A pilot production in support of the National Defense Strategy. The proposed undertaking would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission. This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this proposed undertaking; however, there could be an increase in operations within the airspace.

The beddown process would occur in phases associated with the manufacture and delivery of the F-35A aircraft. Delivery of the first aircraft to Kingsley Field would occur in Fiscal Year (FY) 2027. Delivery of the final aircraft would be expected in FY 2029, at which time the full complement of up to 24 Primary Aerospace Vehicle Authorized (PAA) (plus 2 Backup Aerospace Vehicle Authorized [BAA]) F-35A aircraft would be based at Kingsley Field.

To provide the training needed to ensure combat readiness, F-35A aircrews would conduct operations in two types of areas: (1) an airfield associated with the installation, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A would use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures.

### **The No Action Alternative**

Under the No Action Alternative, the 173 FW would continue to conduct their current mission using existing F-15C/D aircraft. Any construction and repair projects required for the current mission would be implemented. Implementation of the No Action Alternative would include the interior renovation of Buildings 130 and 302. It would include the interior renovation of Buildings 220, 221, and 234 if alternate options are chosen.

### **Area of Potential Effects (36 CFR Section 800.4(a)(1))**

An APE is defined in 36 CFR Section 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The NGB has reviewed the undertaking and defined the airspace APE for the proposed undertaking specific to the state of Oregon as the lands located beneath existing military training airspace from surface level to the ceiling of each airspace designation plus a 1-mile horizontal buffer. Attachment 1 includes a map of the APE.

#### **Identification of Listed Historic Properties (36 CFR Section 800.4(b))**

Information on cultural resources within the APE was derived from conducting background research using the National Register of Historic Places (NRHP) Information Database to identify NRHP-listed properties beneath the affected airspace that can include national historic landmarks, cultural landscapes, national monuments, historic trails, and historic battlefields within the same area.

A total of 166 listed historic properties underly the airspace on lands beneath the military training airspace used by 173 FW in Oregon (NPS 2024a, 2024b; Attachment 2). These listed historic properties include 68 archaeological sites, 9 mines, 4 lighthouses, 17 houses, 6 ranger or coast guard stations, 5 hotels, 4 cemetery's, 13 bridges, 6 ditches, 3 ranch/ranch complexes, 2 theatre's, 2 historic districts, 2 banks, 1 library, 2 city hall's, 2 churches, 1 cabin, 8 general buildings, the Siskiyou Smokejumper Base, a life boat station, a river light, an Elks Temple, a printing plant, Tribal Hall of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, a shipwreck, Cape Perpetua shelter and parapet, the Allen Gulch townsite, the Wheeler Ridge Japanese Bombing Site, and the Stone Bridge and the Oregon Central Military Wagon Road (NPS 2024a, 2024b). Six Oregon State Historic Landmarks are located beneath the Dolphin North Military Operations Area (MOA). These historic landmarks are titled: Empire City, Spruce Soldiers, Cape San Sebastian, Conflict of Pistol River, Gold Beach, and the location of the Japanese Attack on Oregon (NoeHill 2024).

NGB invited 44 federally recognized Tribal Nations who may cultural or historical ties to lands beneath the airspace to consult on this proposed undertaking. Of the 44 Tribal Nations, NGB received responses from 7 Tribal Nations. In accordance with Executive Order (EO) 13175, *Consultation and Coordination with Indian Tribal Governments*; EO 12372, *Intergovernmental Review of Federal Programs*; and Section 106 of the National Historic Preservation Act and its implementation regulations found at 36 CFR Parts 800.2, 800.3, and 800.4, the 173 FW and NGB respectfully request your assistance in identifying the following:

- traditional resources or sacred sites that may be located within the current APE;
- historic properties in the APE of which we may not be aware;
- and/or your Tribe's interest in participating in additional consultation.

#### **Results of Identification and Evaluation (36 CFR Section 800.4(d))**

Because the proposed undertaking includes airspace in Oregon, only those historic properties that would reasonably be affected by visual (overflights, chaff and flares) and noise intrusions are considered. These include architectural resources, archaeological resources with standing buildings or structures, and traditional cultural properties.

U Under the Proposed Action, the F-35A would use a very similar altitude profile as the F-15C/D in training; however, the F-35A would utilize altitudes above 20,000 feet MSL 16 percent more than the F-15C/D currently does. The use of low altitudes (between 500 feet above ground level [AGL] and 10,000 feet MSL) would remain approximately the same as it currently is.

In general, noise from the F-35A would be 3 to 5 dB greater in terms of sound exposure level (SEL) and 6 to 8 dB greater in maximum sound level ( $L_{max}$ ) when compared to the F-15C/D while operating in military power and 400 knots. The greatest DNL/ Onset-Rate Adjusted Day-Night Average Sound Level ( $L_{dnmr}$ ) of 49 dB would occur in Juniper Low, Juniper East Low, Goose North, and Goose South MOAs due to a combination of an increase in operations in Goose and the lower airspace floor and lower altitudes in Juniper Low and Juniper East Low MOAs. The remainder of the Juniper and Hart complex outside of the Juniper Low and Juniper East Low areas would experience DNL/ $L_{dnmr}$  of 40 dB. The DNL/ $L_{dnmr}$  in Dolphin North and South MOA would be less than 35 dB due to the relatively small number of sorties spread over a large area with a minimum altitude of 11,000 feet MSL. Overall, there would be an increase in DNL/ $L_{dnmr}$  of 2 to 5 dB across the airspace, except Dolphin North and South MOAs that would experience a negligible change from the No Action Alternative. Based on noise level calculations for lands beneath the military training airspace, there would be no significant effects on archaeological resources, historic structures, or traditional cultural properties as a result of the implementation of the Proposed Action.

Due to the high altitude of the overflights, small size of the aircraft, and the high speeds, the aircraft would not be readily visible to observers on the ground. Therefore, visual intrusions would be minimal and would not represent an increase sufficient to cause adverse effects on the settings of cultural resources.

No additional ground disturbance would occur under the airspace and use of ordnance and defensive countermeasures would occur in areas already used for these activities. The Oregon Air National Guard (ANG) would continue to implement a minimum release altitude of 5,000 feet AGL for flares deployed in ANG-managed Oregon airspace (NGB 2017). The 173 FW would adhere to local operating procedures for chaff and flare release to include the Mountain Home Airspace and restricted airspace associated with the Saylor Creek Range (Department of the Air Force [DAF] 2023). Overall, flares are unlikely to adversely affect cultural resources. Therefore, the introduction of material to archaeological sites or standing structures from the use of flares would not have an adverse effect on these resources.

### **Conclusion**

Pursuant to 36 CFR §800.4(d)(1), the NGB has reached a preliminary determination of no historic properties affected for the proposed undertaking with respect to historic properties beneath the military training airspace in Oregon. However, prior to finalizing our effects determination, we would like to solicit input regarding Tribal resources that may be present within the APE.

If you request additional consultation, the NGB and 173 FW will work with your office to adopt procedures that will meet your Tribe's needs and requirements for continued consultation.

In order for the NGB to address your concerns in a timely manner for both the Tribe and the proposed undertaking, please respond to this letter within thirty (30) days of receipt to J.

Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS,  
3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at  
[NGB.CCA4F.NEPACOMMENTS@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTS@us.af.mil) with the subject titled as ATTN: 173 FW EIS.  
We look forward to continuing consultation for the proposed undertaking, and we thank you for  
your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Gaudinski', with a red ink mark at the end.

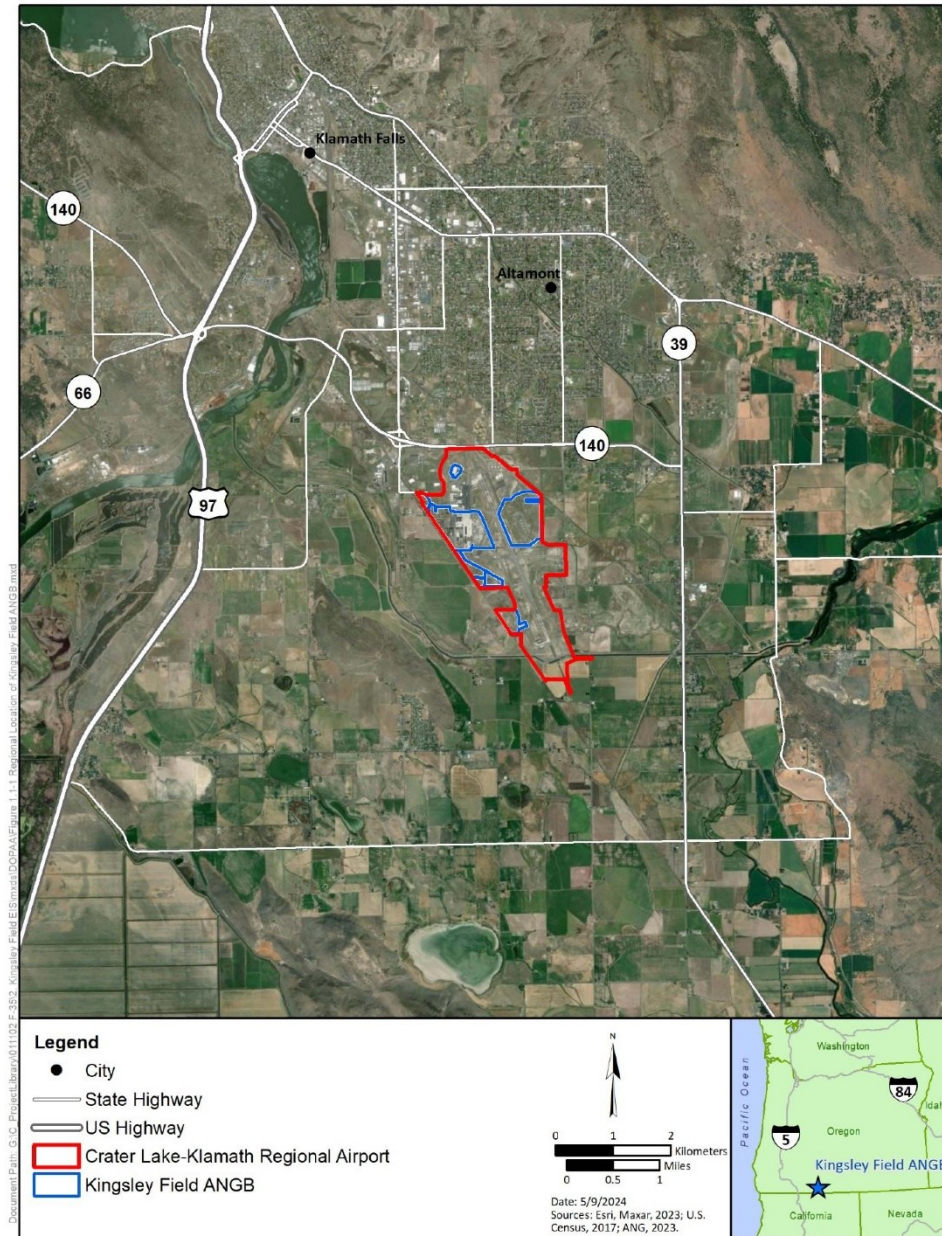
ADAM J. GAUDINSKI, Colonel, ORANG  
Commander, 173d Fighter Wing

Attachments:

1. Maps
2. Table of Historic Properties
3. References Cited



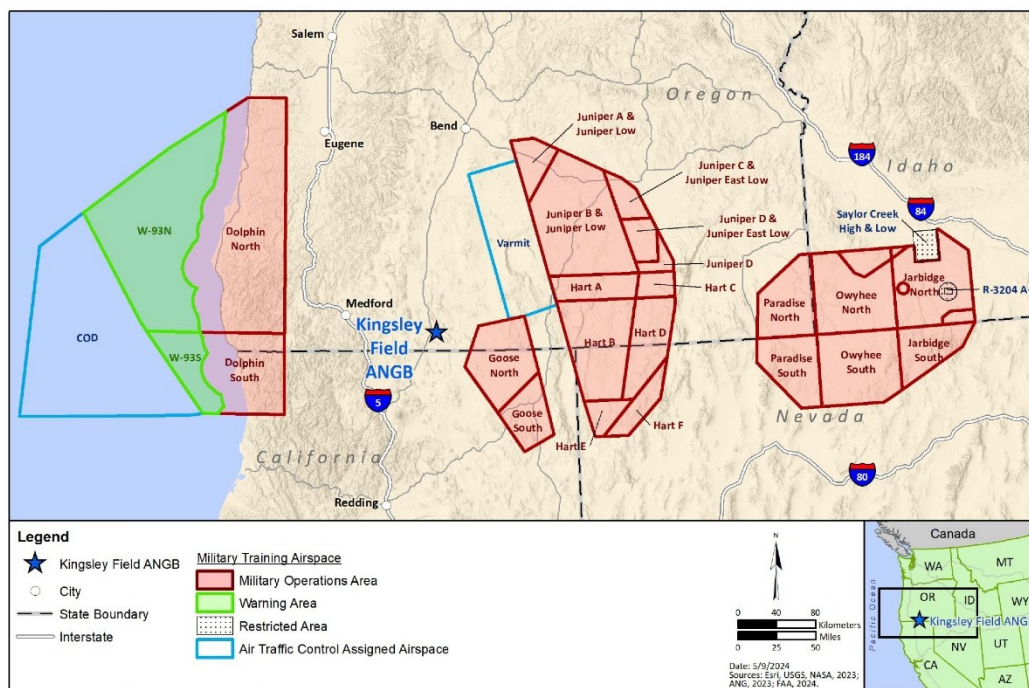
Attachment 1 - Regional Location Map of Kingsley Field ANGB





**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 - Kingsley Field ANGB Military Training Airspace



Attachment 2 – Historic Properties

| <b>Historic Properties Located Beneath the Airspace in Oregon</b> |               |             |
|-------------------------------------------------------------------|---------------|-------------|
| <b>Resource Name</b>                                              | <b>County</b> | <b>City</b> |
| <b>Dolphin North MOA</b>                                          |               |             |
| National Register Listed                                          |               |             |
| Archeological Site 35CS8                                          | Coos          | Bandon      |
| Archeological Site 35CS9                                          | Coos          | Bandon      |
| Breuer Building                                                   | Coos          | Bandon      |
| Bullards Beach Site                                               | Coos          | Bandon      |
| Coquille River Life Boat Station                                  | Coos          | Bandon      |
| Coquille River Light                                              | Coos          | Bandon      |
| First National Bank of Bandon                                     | Coos          | Bandon      |
| Philpott Site (35 CS 1)                                           | Coos          | Bandon      |
| Running Foxe Midden (35CS131)                                     | Coos          | Bandon      |
| Archeological Site 35CS129                                        | Coos          | Charleston  |
| Archeological Site 35CS39                                         | Coos          | Charleston  |
| Archeological Site 35CS66                                         | Coos          | Charleston  |
| Archeological Site 35CS67                                         | Coos          | Charleston  |
| Cape Arago Lighthouse                                             | Coos          | Charleston  |
| Cape Arago Site (35CS10)                                          | Coos          | Charleston  |
| Mussell Reef Village                                              | Coos          | Charleston  |
| Samuels Site (35CS138)                                            | Coos          | Charleston  |
| Chandler Hotel and Annex                                          | Coos          | Coos Bay    |
| Coke, J. S., Building                                             | Coos          | Coos Bay    |
| Coos Bay Carnegie Library                                         | Coos          | Coos Bay    |
| Coos Bay National Bank Building                                   | Coos          | Coos Bay    |
| Egyptian Theatre                                                  | Coos          | Coos Bay    |
| Hub Department Store Building                                     | Coos          | Coos Bay    |
| Koski Building                                                    | Coos          | Coos Bay    |
| Marshfield City Hall                                              | Coos          | Coos Bay    |
| Marshfield Elks Temple                                            | Coos          | Coos Bay    |
| Marshfield Hotel                                                  | Coos          | Coos Bay    |
| Marshfield I.O.O.F. Cemetery                                      | Coos          | Coos Bay    |
| Marshfield Sun Printing Plant                                     | Coos          | Coos Bay    |
| Myrtle Arms Apartment Building                                    | Coos          | Coos Bay    |
| Nasburg--Lockhart House                                           | Coos          | Coos Bay    |
| Nerdrum, Hjalte, House                                            | Coos          | Coos Bay    |
| Nerdrum--Conrad House                                             | Coos          | Coos Bay    |
| Olsson, Captain Bror W., House                                    | Coos          | Coos Bay    |
| Seelig--Byler House                                               | Coos          | Coos Bay    |
| Tower, Maj. Morton, House                                         | Coos          | Coos Bay    |
| Tower-Flanagan House                                              | Coos          | Coos Bay    |

Attachment 2 – Historic Properties

| <b>Historic Properties Located Beneath the Airspace in Oregon</b>                |               |                |
|----------------------------------------------------------------------------------|---------------|----------------|
| <b>Resource Name</b>                                                             | <b>County</b> | <b>City</b>    |
| Tribal Hall of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians | Coos          | Coos Bay       |
| Cary, Leo J., House                                                              | Coos          | Coquille       |
| Coquille City Hall                                                               | Coos          | Coquille       |
| Harlocker, Judge Lintner, House                                                  | Coos          | Coquille       |
| Paulson, John E. and Christina, House                                            | Coos          | Coquille       |
| Sherwood, A. J., House                                                           | Coos          | Coquille       |
| St. James Episcopal Church                                                       | Coos          | Coquille       |
| Abernethy, Edwin and Ethel, House                                                | Coos          | Myrtle Point   |
| Black, A. H. and Company, Building                                               | Coos          | Myrtle Point   |
| Gearhart, John Neal and Dora, House                                              | Coos          | Myrtle Point   |
| Reorganized Church of Latter Day Saints                                          | Coos          | Myrtle Point   |
| 35-CS-130-The Osprey Site                                                        | Coos          | North Bend     |
| Archeological Site 35CS24                                                        | Coos          | North Bend     |
| Coos Bay Bridge NO. 01823                                                        | Coos          | North Bend     |
| Hotel North Bend                                                                 | Coos          | North Bend     |
| Liberty Theatre                                                                  | Coos          | North Bend     |
| Sandy Creek Bridge                                                               | Coos          | Remote         |
| Rogue River Ranch                                                                | Curry         | Agness         |
| 35-CU-215-High Point Shell Midden                                                | Curry         | Carpenterville |
| Arch Rock                                                                        | Curry         | Carpenterville |
| Archeological Site 35CU69                                                        | Curry         | Carpenterville |
| Indian Sands                                                                     | Curry         | Carpenterville |
| Khustenete-Hustenate-Xusteneten                                                  | Curry         | Carpenterville |
| Miller Creek                                                                     | Curry         | Carpenterville |
| Sheep Trail Shell Midden (35CU32)                                                | Curry         | Carpenterville |
| Thunder Rock                                                                     | Curry         | Carpenterville |
| Whale Head                                                                       | Curry         | Carpenterville |
| Whaleshead Lithic Site (35CU207)                                                 | Curry         | Carpenterville |
| Whaleshead South Midden (35CU208)                                                | Curry         | Carpenterville |
| Whaleshead Trail Viewpoint (35CU36)                                              | Curry         | Carpenterville |
| Gold Beach Ranger Station                                                        | Curry         | Gold Beach     |
| HUME, MARY D.                                                                    | Curry         | Gold Beach     |
| Rogue River Bridge No. 01172                                                     | Curry         | Gold Beach     |
| Archeological Site 35CU31                                                        | Curry         | Pistol River   |
| Eagle Rock                                                                       | Curry         | Pistol River   |
| Little Ridge-Cape Sebastian (35CU77)                                             | Curry         | Pistol River   |
| Little Ridge-Cape Sebastian (35CU78)                                             | Curry         | Pistol River   |
| Pistol River Site-Chetlessentan-Chetleshin-Chet-less-chun-dunn                   | Curry         | Pistol River   |

Attachment 2 – Historic Properties

| <b>Historic Properties Located Beneath the Airspace in Oregon</b>               |                      |                    |
|---------------------------------------------------------------------------------|----------------------|--------------------|
| <b><i>Resource Name</i></b>                                                     | <b><i>County</i></b> | <b><i>City</i></b> |
| Archeological Site 35CU13                                                       | Curry                | Port Orford        |
| Archeological Site 35CU14                                                       | Curry                | Port Orford        |
| Archeological Site 35CU142                                                      | Curry                | Port Orford        |
| Archeological Site 35CU153                                                      | Curry                | Port Orford        |
| Archeological Site 35CU16                                                       | Curry                | Port Orford        |
| Blacklock Point Lithic Site                                                     | Curry                | Port Orford        |
| Blacklock Point Shell Midden                                                    | Curry                | Port Orford        |
| Cape Blanco Lithic Site                                                         | Curry                | Port Orford        |
| Lindberg, Peter John, House                                                     | Curry                | Port Orford        |
| Port Orford Coast Guard Station                                                 | Curry                | Port Orford        |
| Port Orford Site                                                                | Curry                | Port Orford        |
| Archeological Site 35CU1                                                        | Curry                | Sixes              |
| Archeological Site 35CU83                                                       | Curry                | Sixes              |
| Cape Blanco Lighthouse                                                          | Curry                | Sixes              |
| Hughes, Patrick, House                                                          | Curry                | Sixes              |
| Newburgh Lithic Site (35CU209)                                                  | Curry                | Sixes              |
| Sixes Hotel                                                                     | Curry                | Sixes              |
| Brown, Henry, House                                                             | Douglas              | Elkton             |
| 35-DO-130-Tahkenitch Landing Site                                               | Douglas              | Gardiner           |
| Gardiner Historic District                                                      | Douglas              | Gardiner           |
| Umpqua River Bridge No. 01822                                                   | Douglas              | Reedsport          |
| Umpqua River Light House                                                        | Douglas              | Winchester Bay     |
| US Coast Guard Station--Umpqua River,<br>Administration and Equipment Buildings | Douglas              | Winchester Bay     |
| Store Gulch Guard Station No. 1020                                              | Josephine            | Cave Junction      |
| Nauke, William and Nannie, House                                                | Josephine            | Kerby              |
| Whisky Creek Cabin                                                              | Josephine            | Wolf Creek         |
| Benedict, Edwin E., House                                                       | Lane                 | Florence           |
| Heceta Head Lighthouse and Keepers Quarters                                     | Lane                 | Florence           |
| Kyle, William, and Sons, Building                                               | Lane                 | Florence           |
| Siuslaw River Bridge No. 01821                                                  | Lane                 | Florence           |
| Lake Creek Bridge                                                               | Lane                 | Greenleaf          |
| Big Creek Bridge No. 01180                                                      | Lane                 | Heceta Head        |
| Cape Creek Bridge No. 01113                                                     | Lane                 | Heceta Head        |
| Archeological site 35LA1                                                        | Lane                 | Searose Beach      |
| Archeological Site 35LA11                                                       | Lane                 | Searose Beach      |
| Archeological Site 35LA13                                                       | Lane                 | Searose Beach      |
| Archeological Site 35LA16                                                       | Lane                 | Searose Beach      |
| Archeological site 35LA2                                                        | Lane                 | Searose Beach      |
| Archeological Site 35LA227                                                      | Lane                 | Searose Beach      |

Attachment 2 – Historic Properties

| <b>Historic Properties Located Beneath the Airspace in Oregon</b> |               |                           |
|-------------------------------------------------------------------|---------------|---------------------------|
| <b>Resource Name</b>                                              | <b>County</b> | <b>City</b>               |
| Archeological site 35LA228                                        | Lane          | Searose Beach             |
| Archeological site 35LA4                                          | Lane          | Searose Beach             |
| Archeological site 35LA5                                          | Lane          | Searose Beach             |
| Archeological site 35LA6                                          | Lane          | Searose Beach             |
| Archeological site 35LA7                                          | Lane          | Searose Beach             |
| Bob Creek Site 35LA10                                             | Lane          | Searose Beach             |
| Devil's Elbow Site (35LA17)                                       | Lane          | Searose Beach             |
| Neptune, The, Site (35LA3)                                        | Lane          | Searose Beach             |
| Strawberry Hill Site (35LA8)                                      | Lane          | Searose Beach             |
| Deadwood Creek Bridge                                             | Lane          | Swisshome                 |
| Wildcat Creek Bridge                                              | Lane          | Walton                    |
| Ten Mile Creek Bridge No. 01181                                   | Lane          | Yachats                   |
| Fisher School Bridge                                              | Lincoln       | Fisher                    |
| Cape Perpetua Shelter and Parapet                                 | Lincoln       | Yachats                   |
| North Fork of the Yachats Bridge                                  | Lincoln       | Yachats                   |
| <b>State Registered</b>                                           |               |                           |
| Empire City                                                       | Coos          | Coos Bay                  |
| Spruce Soldiers                                                   | Coos          | Coquille                  |
| Japanese Attack on Oregon                                         | Curry         | Brookings                 |
| Cape San Sebastian                                                | Curry         | Cape Sebastian State Park |
| Gold Beach                                                        | Curry         | Gold Beach                |
| Conflict at Pistol River                                          | Curry         | Pistol River State Park   |
| <b>Dolphin South MOA</b>                                          |               |                           |
| Archeological Site 35CU79                                         | Curry         | Brookings                 |
| Archeological Site 35CU80                                         | Curry         | Brookings                 |
| Central Building                                                  | Curry         | Brookings                 |
| Harris Park Mound                                                 | Curry         | Brookings                 |
| Indian Sands                                                      | Curry         | Brookings                 |
| Lone Ranch Creek Mound                                            | Curry         | Brookings                 |
| Wheeler Ridge Japanese Bombing Site                               | Curry         | Brookings                 |
| Allen Gulch Townsite                                              | Josephine     | Cave Junction             |
| Cameron Mine                                                      | Josephine     | Cave Junction             |
| Cedar Guard Station No. 1019                                      | Josephine     | Cave Junction             |
| Deep Gravel Mine                                                  | Josephine     | Cave Junction             |
| Esterly Pit No. 2-Llano De Oro Mine                               | Josephine     | Cave Junction             |
| Fry Gulch Mine                                                    | Josephine     | Cave Junction             |
| High Gravel Mine                                                  | Josephine     | Cave Junction             |
| Logan Cut                                                         | Josephine     | Cave Junction             |

Attachment 2 – Historic Properties

| <b>Historic Properties Located Beneath the Airspace in Oregon</b> |                      |                    |
|-------------------------------------------------------------------|----------------------|--------------------|
| <b><i>Resource Name</i></b>                                       | <b><i>County</i></b> | <b><i>City</i></b> |
| Logan Drain Ditches                                               | Josephine            | Cave Junction      |
| Logan Wash Ditch                                                  | Josephine            | Cave Junction      |
| Middle Ditch                                                      | Josephine            | Cave Junction      |
| Old Placer Mine                                                   | Josephine            | Cave Junction      |
| Oregon Caves Historic District                                    | Josephine            | Cave Junction      |
| Osgood Ditch                                                      | Josephine            | Cave Junction      |
| Plataurica Mine                                                   | Josephine            | Cave Junction      |
| Siskiyou Smokejumper Base                                         | Josephine            | Cave Junction      |
| St. Patrick's Roman Catholic Cemetery                             | Josephine            | Cave Junction      |
| Upper Ditch                                                       | Josephine            | Cave Junction      |
| Waldo Cemetery                                                    | Josephine            | Cave Junction      |
| Waldo Chinese Cemetery                                            | Josephine            | Cave Junction      |
| Waldo Mine                                                        | Josephine            | Cave Junction      |
| Wimer Ditch                                                       | Josephine            | Cave Junction      |
| <b>Juniper D and East Low MOA</b>                                 |                      |                    |
| Pictograph Site                                                   | Deschutes            | Brothers           |
| Frenchglen Hotel                                                  | Harney               | Frenchglen         |
| Riddle Ranch                                                      | Harney               | Frenchglen         |
| <b>Hart B MOA</b>                                                 |                      |                    |
| Greaser Petroglyph Site                                           | Lake                 | Adel               |
| Shirk, David L., Ranch                                            | Lake                 | Adel               |
| Stone Bridge and the Oregon Central Military Wagon Road           | Lake                 | Plush              |
| <b>Varmit ATCAA</b>                                               |                      |                    |
| Cabin Lake Guard Station                                          | Lake                 | Bend               |
| Eskelin, Ed, Ranch Comple                                         | Lake                 | Silver Lake        |

Attachment 3 – References Cited

Department of the Air Force (DAF)

2023    Airspace Optimization for Readiness EIS for Mountain Home AFB.

National Guard Bureau (NGB)

2017    Proposed Establishment and Modification of Oregon Military Training Airspace Environmental Impact Statement.

National Park Service (NPS)

2024a   National Register of Historic Places Spatial Data. Last updated 19 April 2024.

2024b   National Register of Historic Places Spreadsheet of Everything. Last updated 10 July 2024.

NoeHill

2024    List of State Historic Landmarks and Points of Interest. Accessed June 19, 2024 at:  
<https://noehill.com/sitemap.asp>.

Oregon State Historic Preservation Office (SHPO)

2024a   Oregon Archaeological Records Remote Access (OARRA) & Archaeology Bibliographic Database. Accessed 10 July 2024.

2024b   Oregon Historic Sites Map. Accessed July 10, 2024 at:  
<https://maps.prd.state.or.us/histsites/historicsites.html>.



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**From:** Kaitlin Hakanson <kaitlin.hakanson@klamathtribes.com>

**Sent:** Friday, May 8, 2026 7:55 PM

**To:** DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <joseph.de\_gregory@us.af.mil>

**Subject:** [Non-DoD Source] RE: Official Tribal Correspondence: 2025 EIS

Hi Rocco,

Thanks for sending these materials and for the time and attention you provided to my concerns when you first reached out about this project.

We have no comments or concerns to share about the potential adverse effect to the Kingsley Field Alert Hangar Historic District.

Thank you,  
-Kaitlin

Kaitlin Hakanson, MA RPA  
Archaeologist, Culture & Heritage Department  
The Klamath Tribes

[Kaitlin.Hakanson@KlamathTribes.com](mailto:Kaitlin.Hakanson@KlamathTribes.com)

Office: 541-783-2764 ext. 407

Cell: 541-576-4030

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**From:** DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <[joseph.de\\_gregory@us.af.mil](mailto:joseph.de_gregory@us.af.mil)>  
**Sent:** Friday, April 24, 2026 6:04 AM  
**To:** Kaitlin Hakanson <[kaitlin.hakanson@klamathtribes.com](mailto:kaitlin.hakanson@klamathtribes.com)>  
**Subject:** Official Tribal Correspondence: 2025 EIS

Caution External Sender: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Ms. Hakanson,

Please find the attached cover letter regarding the cultural resource survey conducted at Kingsley Field that is associated with the Draft Environmental Impact Statement (EIS) for the proposed F-35A Lightning II basing mission at Kingsley Field ANGB. As detailed in the letter, the National Guard Bureau (NGB) is evaluating potential impacts on the human and natural environment, as well as historic properties under Section 106 of the NHPA.

The NGB has preliminarily determined that the project will have an adverse effect on the newly identified Kingsley Field Alert Hangar Historic District, specifically Building 219, due to planned renovations. We invite your comments on these findings and any Tribal resources that may be affected.

The Draft EIS is available at [www.kingsleyfieldf35eis.com](http://www.kingsleyfieldf35eis.com). The full cultural resource report mentioned in the cover letter will be transmitted via a secure DoD SAFE link. Please ensure the report is downloaded promptly upon receipt of the automated notification.

Comments should be directed to [NGB.CCA4F.NEPACOMMENTS@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTS@us.af.mil) with the subject titled "ATTN: 173 FW EIS".

V/R,

//SIGNED//

J. Rocco de Gregory, RPA, GS-13, DAF  
Cultural Resources Program Manager  
NGB/A4VN  
Air National Guard Readiness Center (ANGRC)  
3501 Fetchet Ave  
Joint Base Andrews, MD 20762  
Comm 240-612-8541

**APPENDIX B3**  
**STATE HISTORIC PRESERVATION OFFICE (SHPO)**  
**CORRESPONDENCE**

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The sample scoping letters following were distributed to the list below:

Tricia Canaday, Deputy State Historic Preservation Officer, Idaho State Historical Society, 2205 Old Penitentiary Rd., Boise ID 83712

Chrissy Curran, Deputy State Historic Preservation Officer, State Historic Preservation Office, Oregon Parks and Recreation Department, 725 Summer St, Ste C, Salem OR 97301

Rebecca Palmer, State Historic Preservation Officer, Nevada State Historic Preservation Office, 901 South Stewart, Suite 5004, Carson City NV 89701

Julianne Polanco, State Historic Preservation Officer, California Office of Historic Preservation, 1725 23rd Street, Suite 100, Sacramento CA 95816

Lisa Sumption, State Historic Preservation Officer, State Historic Preservation Office Oregon Parks and Recreation Department, 725 Summer St, Ste C, Salem OR 97301



**Sample Oregon SHPO Letter**  
**NATIONAL GUARD BUREAU**  
3501 FETCHET AVENUE JOINT BASE ANDREWS 20762-5157

6 June 2024

Michelle Kasunic  
Acting Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

Lisa Sumption  
State Historic Preservation Officer  
State Historic Preservation Office  
Oregon Parks and Recreation Department  
725 Summer St, Ste C  
Salem OR 97301

Dear Ms. Sumption

The National Guard Bureau (NGB) would like to initiate consultation with your office under Section 106 of the National Historic Preservation Act of 1966 (NHPA), and its implementing regulations (36 Code of Federal Regulations [CFR] § 800) on a proposed undertaking at the 173d Fighter Wing (173 FW) Kingsley Field Air National Guard Base (ANGB) located in Klamath Falls, OR (see Attachment 1). The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

Pursuant to National Environmental Policy Act of 1969 (42 United States Code 4321 et seq.), the NGB is preparing an Environmental Impact Statement (EIS) for the 173 FW that will analyze impacts that could significantly affect the quality of the human environment, including those with the potential to affect historic properties, sacred sites, and traditional cultural properties. The purpose of the Proposed Action is to increase F-35A pilot production in support of the National Defense Strategy. The Proposed Action would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission. This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this Proposed Action; however, there could be an increase in operations within the airspace.

As referenced in the attached project list (Attachment 2), the proposed undertaking includes demolition, renovation, and/or repair existing buildings and structures, and new construction projects. The NGB and 173 FW have reviewed previous cultural resources surveys conducted at the installation and have identified thirty (30) buildings at Kingsley Field that will require evaluation for the National Register of Historic Places (NRHP) since reaching historic

age. Of the thirty (30) buildings needing evaluation, nine (9) are currently proposed for demolition. Because of the high number of buildings that have reached historic age since the last survey for Kingsley Field, NGB is proposing to evaluate each resource individually and as a possible historic district. Due to the significant number of new construction projects requiring ground disturbance, and in consideration that the last archaeological investigation for the base occurred in 2002, NGB proposes to evaluate archaeological needs for the undertaking in consultation with the OR State Historic Preservation Office (SHPO).

An Area of Potential Effects (APE) is defined in 36 CFR § 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The NGB has reviewed the undertaking and defined the APE as the jurisdictional boundary of Kingsley Field ANGB (Attachment 3), areas affected by noise levels of 65 dB DNL and greater from the aircraft operations, and lands located beneath existing military training airspace from surface level to the top of each airspace designation plus a 1-mile horizontal buffer (Attachment 4). As the EIS develops to include results from the noise study, NGB will continue to consult with your office regarding any possible changes to the APE identified in this initial notification letter.

In accordance with 36 CFR § 800.4(a)(1), we are providing your office with this opportunity to comment on our proposed APE for this undertaking. Please respond in writing to the NGB within thirty (30) days. Comments may be addressed to Michelle Kasunic, Acting Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil](mailto:NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil) with the subject titled as ATTN: 173 FW EIS. We look forward to continuing consultation for the proposed undertaking, and we thank you for your assistance.

Sincerely,



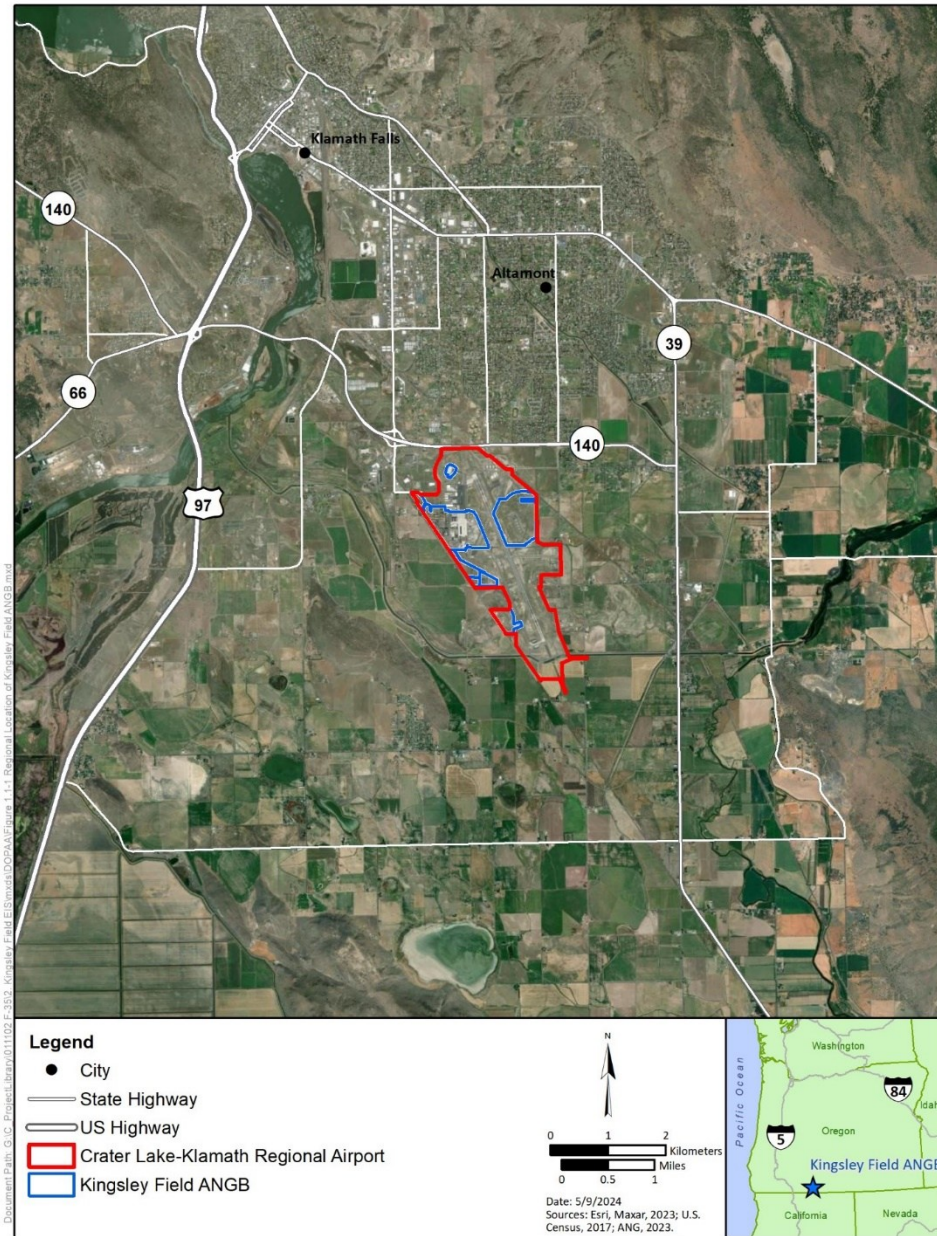
Michelle Kasunic, GS-13, DAF  
Acting Cultural Resources Program Manager

Attachments:

1. Regional Location Map of Kingsley Field ANGB
2. Proposed Construction, Renovation, and Demolition Project Table
3. Kingsley Field ANGB Area of Potential Effects
4. Kingsley Field ANGB Military Training Airspace Map



Attachment 1 - Regional Location Map of Kingsley Field ANGB





Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

**Summary of Construction and Renovation Projects**

| <i>Project #/<br/>Project<br/>Name.</i>                     | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                        | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|-------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#1 Provide<br/>Training<br/>Classrooms<sup>1</sup></b>   | <b>1a</b>         | Modify existing B209 (existing simulator building) to house flight training classrooms (companion to Project 1b/1c).                                              | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                             | <b>1b</b>         | Construct addition to B209 to include entire category code (i.e., authorized area) for flight training classrooms (companion to Project 1a/1c).                   | Alternate                                    | 2027                         | 3,500                                                            | 3,500                                          | Yes                        | No                               |
|                                                             | <b>1c</b>         | Construct new building containing 4 FMS, 6 MMRT, and contractor support (companion to Project 1a/1b).                                                             | Alternate                                    | 2027                         | 29,583                                                           | 29,583                                         | Yes                        | No                               |
|                                                             | <b>1d</b>         | Construct new building containing flight training classrooms, 4 full motion simulators, 6 MMRT, and contractor support (includes demolition of B242, B230, B231). | Preferred                                    | 2027                         | 38,300                                                           | 23,958                                         | Yes                        | No                               |
| <b>#2 Construct<br/>Echo<br/>Aircraft<br/>Shelter</b>       | <b>2</b>          | Construct 4-bay, 8 aircraft shelter sized to universal fighter standards.                                                                                         | Preferred                                    | 2027                         | 316,000                                                          | 272,000                                        | Yes                        | No                               |
| <b>#3<br/>Operations<br/>Group<br/>Facility<sup>2</sup></b> | <b>3a</b>         | Repair B243 operations group facility to meet F-35 requirements for special access program facilities, office space, and contractor support.                      | Alternate                                    | 2028                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                             | <b>3b</b>         | Construct new operations group facility containing special access program facilities, office space, contractor support (includes demolition of B243).             | Alternate                                    | 2028                         | 25,200                                                           | 0                                              | Yes                        | No                               |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project<br/>Name.</i>            | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                                                                        | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|----------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
|                                                    | <b>3c</b>         | Construct new operations group facility combined with maintenance facility containing special access program facilities, office space, contractor support, includes demolition of B243 (companion to Project 9d). | Preferred                                    | 2028                         | 25200                                                            | 0                                              | Yes                        | No                               |
| <b>#4 ASE<br/>Facility<sup>3</sup></b>             | <b>4a</b>         | Repair B216 for use as aircraft support equipment facility.                                                                                                                                                       | Alternate                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>4b</b>         | Construct addition to B332 to accommodate increase requirement for ASE facility                                                                                                                                   | Preferred                                    | 2029                         | 1,750                                                            | 0                                              | Yes                        | No                               |
|                                                    | <b>4c</b>         | Construct new B332 for use as ASE facility                                                                                                                                                                        | Alternate                                    | 2029                         | 15,000                                                           | 0                                              | Yes                        | No                               |
|                                                    | <b>4d</b>         | Repair B213 for use as ASE facility                                                                                                                                                                               | Alternate                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
| <b>#5 Engine<br/>Shop<sup>4</sup></b>              | <b>5a</b>         | Repair B213 engine shop for change in engine system and to include wheel/tire facility.                                                                                                                           | Alternate                                    | 2028                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>5b</b>         | Construct new engine shop for change in engine system and to include wheel/tire facility.                                                                                                                         | Alternate                                    | 2028                         | 15,000                                                           | 5,000                                          | Yes                        | No                               |
| <b>#6 Avionics/<br/>Pilot Fitment<br/>Facility</b> | <b>6a</b>         | Repair B331 to accommodate reduced avionics, battery room, and pilot fitment facility.                                                                                                                            | Preferred                                    | 2029                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                    | <b>6b</b>         | Construct new B331 avionics, battery room, and pilot fitment facility.                                                                                                                                            | Alternate                                    | 2028                         | 12,000                                                           | 0                                              | Yes                        | No                               |
| <b>#7 Loading<br/>Dock</b>                         | <b>7</b>          | Repair loading dock for larger load leveler and better space utilization.                                                                                                                                         | Preferred                                    | 2026                         | 50,000                                                           | 4,000                                          | Yes                        | No                               |
| <b>#8<br/>Temporary<br/>LAMS<br/>Shelters</b>      | <b>8</b>          | Install temporary LAMS shelters for aircraft on existing pavements.                                                                                                                                               | Preferred                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project<br/>Name.</i>                                                  | <i>Project ID</i> | <i>Project Description</i>                                                                                                                                               | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|------------------------------------------------------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#9<br/>Maintenance<br/>Hangar and<br/>Shops<sup>5</sup></b>                           | <b>9a</b>         | Repair and reconfigure B219 maintenance hangar and shops to include improvements for seismic, light protection systems, and fire protection systems.                     | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                                                          | <b>9b</b>         | Construct new 6-aircraft maintenance hangar (Phase 1), includes demolition of east bay B219 (integrates with 9c Phase 2).                                                | Alternate                                    | 2028                         | 50,700                                                           |                                                | Yes                        | No                               |
|                                                                                          | <b>9c</b>         | Construct new aircraft maintenance shops (Phase 2), includes demolition of west bay B219 (integrates with 9b Phase 1).                                                   | Alternate                                    | 2026                         | 36,800                                                           |                                                | Yes                        | No                               |
|                                                                                          | <b>9d</b>         | Construct new combined 6-aircraft maintenance hangar, aircraft maintenance shops, and AMU. Includes demolition of B219.                                                  | Preferred                                    | 2027                         | 90,000                                                           |                                                | Yes                        | No                               |
| <b>#10<br/>Munitions<br/>Maintenance<br/>and<br/>Inspection<br/>Facility<sup>6</sup></b> | <b>10a</b>        | Repair existing maintenance and inspection facility to meet SCIF needs and update systems.                                                                               | Preferred                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                                                          | <b>10b</b>        | Construct new munitions maintenance and inspection facility for 1.1 (mass detonation) and 1.2 (fragmentation) explosives operations to meet minimum explosive standards. | Preferred                                    | 2026                         | 3,900                                                            | 3,900                                          | Yes                        | No                               |
| <b>#11<br/>Munitions<br/>Trailer</b>                                                     | <b>11</b>         | Construct new pull through maintenance facility for large trailers.                                                                                                      | Preferred                                    | 2026                         | 1,500                                                            |                                                | Yes                        | No                               |
| <b>#12<br/>Munitions<br/>Assembly<br/>Pad</b>                                            | <b>12</b>         | Construct new munitions assembly pad and inert storage facility.                                                                                                         | Preferred                                    | 2030                         | 20,000                                                           | 20,000                                         | Yes                        | No                               |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project<br/>Name.</i>         | <i>Project ID</i> | <i>Project Description</i>                                                                                                   | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|-------------------------------------------------|-------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#13<br/>Weapons<br/>Facility<sup>7</sup></b> | <b>13a</b>        | Repair B500 weapons release facility to meet standards for F-35 and safety and seismic upgrades.                             | Alternate                                    | 2027                         | 0                                                                | 0                                              | Yes                        | No                               |
|                                                 | <b>13b</b>        | Construct new hangar bay for weapons load training and light protection system parking spot                                  | Preferred                                    | 2027                         | 15,000                                                           | 15,000                                         | Yes                        | No                               |
|                                                 | <b>13c</b>        | Construct new facility attached to weapons load training bay including all shops for associated AMU AFSC's (currently AMXS). | Alternate                                    | 2027                         | 22,400                                                           | 22,400                                         | Yes                        | No                               |
|                                                 | <b>13d</b>        | Construct new weapons release facility attached to weapons load training facility.                                           | Preferred                                    | 2027                         | 18,000                                                           | 18,000                                         | Yes                        | No                               |
| <b>#14 Fuel Cell Bay<sup>8</sup></b>            | <b>14</b>         | Construct additional fuel cell maintenance bay onto existing B333 fuel cell bay, and light protection system parking spot    | Preferred                                    | 2029                         | 6,800                                                            | 0                                              | Yes                        | No                               |
| <b>#15 Taxiway A</b>                            | <b>15</b>         | Repair Taxiway A access ramp to B400                                                                                         | Preferred                                    | 2026                         | 8,500                                                            | 0                                              | Yes                        | No                               |
| <b>#16 LRS Covered Parking</b>                  | <b>16</b>         | Construct LRS covered parking for LRS primary vehicles.                                                                      | Preferred                                    | 2030                         | 2,000                                                            | 2,000                                          | Yes                        | Yes                              |
| <b>#17 Civil Engineering Covered Parking</b>    | <b>17</b>         | Construct civil engineering covered parking for snow plowing vehicles.                                                       | Preferred                                    | 2030                         | 4,000                                                            | 4,000                                          | Yes                        | Yes                              |
| <b>#18 Troop Camp</b>                           | <b>18a</b>        | Repair existing B208 troop camp.                                                                                             | Preferred                                    | 2040                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                                 | <b>18b</b>        | Construct new troop camp.                                                                                                    | Alternate                                    | 2040                         | 17,489                                                           | 0                                              | Yes                        | Yes                              |
| <b>#19 Services Facility</b>                    | <b>19a</b>        | Repair B209 services facility.                                                                                               | Preferred                                    | 2035                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                                 | <b>19b</b>        | Construct new services facility.                                                                                             | Alternate                                    | 2035                         | 2,950                                                            | 0                                              | Yes                        | Yes                              |
| <b>#20 Base Exchange/Starbase</b>               | <b>20a</b>        | Repair B302 base exchange and starbase facility.                                                                             | Preferred                                    | 2035                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                                 | <b>20b</b>        | Construct new base exchange and starbase facility.                                                                           | Alternate                                    | 2035                         | 7,860                                                            | 0                                              | Yes                        | Yes                              |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

| <i>Project #/<br/>Project Name.</i>        | <i>Project ID</i> | <i>Project Description</i>                                                                       | <i>Preferred or<br/>Alternate<br/>Option</i> | <i>Construction<br/>Year</i> | <i>Total Area<br/>of New<br/>Ground<br/>Disturbance<br/>(SF)</i> | <i>New<br/>Impervious<br/>Surface<br/>(SF)</i> | <i>Proposed<br/>Action</i> | <i>No Action<br/>Alternative</i> |
|--------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------|------------------------------------------------------------------|------------------------------------------------|----------------------------|----------------------------------|
| <b>#21 Civil<br/>Engineering<br/>Shops</b> | <b>21a</b>        | Construct new civil engineering combined facility.                                               | Preferred                                    | 2030                         | 30,000                                                           | 25,600                                         | Yes                        | Yes                              |
|                                            | <b>21b</b>        | Repair B220 civil engineering shops.                                                             | Alternate                                    | 2030                         |                                                                  |                                                | Yes                        | Yes                              |
|                                            | <b>21c</b>        | Repair B221 civil engineering administration.                                                    | Alternate                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                            | <b>21d</b>        | Repair B234 civil engineering emergency management and storage.                                  | Alternate                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
| <b>#22 Dining<br/>Facility</b>             | <b>22a</b>        | Repair B130 dining facility.                                                                     | Preferred                                    | 2030                         | 0                                                                | 0                                              | Yes                        | Yes                              |
|                                            | <b>22b</b>        | Construct new dining facility.                                                                   | Alternate                                    | 2030                         | 10,800                                                           | 0                                              | Yes                        | Yes                              |
| <b>#23 C-17<br/>Ramp</b>                   | <b>23</b>         | Construct C-17 Ramp on the east side of airfield for C-17 movement per the Oregon Cascadia Zone. | Preferred                                    | 2026                         | 300,000                                                          | 300,000                                        | Yes                        | Yes                              |

*Notes:* <sup>1</sup>Project 1 would require the choice of Project 1a, 1b, 1c combined or Project 1d alone. Project 1d would require the demolition of B242, B230, and B231.

<sup>2</sup>Project 3 would require the choice between Project 3a, 3b, or 3c. Project 3c requires selection of Project 9d.

<sup>3</sup>Project 4 would require the choice between Project 4a, 4b, 4c, or 4d.

<sup>4</sup>Project 5a/5b would not be implemented if the preferred Project 9d is implemented. Implementation of Project 5a or 5b required that Project 9a be implemented.

<sup>5</sup>Project 9 would require the choice of Project 9a, Project 9b/9c, or Project 9d. Implementation of the Project 9c or 9d options would eliminate the need for Project 5a/5b.

Project 9d is the companion to Project 3c. Project 9d would eliminate the need for Project 13c.

<sup>6</sup>Project 10b would require demolition of B540 and B541.

<sup>7</sup>Project 13 would require the choice of the following: 13a/13b, 13b/c, or 13 b/d. Project 13c would not be compatible with 9d.

<sup>8</sup>Project 14 would require demolition of B334.

*Legend:* AMU = aircraft maintenance unit; AFSC = air force specialty code; AMXS = aircraft maintenance squadron; ASE = aircraft support equipment; B = Building, FMS = full motion simulator; LAMS = large area maintenance shelters; LRS = logistics readiness squadron; MMRT = mobile mission rehearsal trainer; PFF = pilot fitment facility; SCIF = sensitive compartmented information facilities; SF = square feet

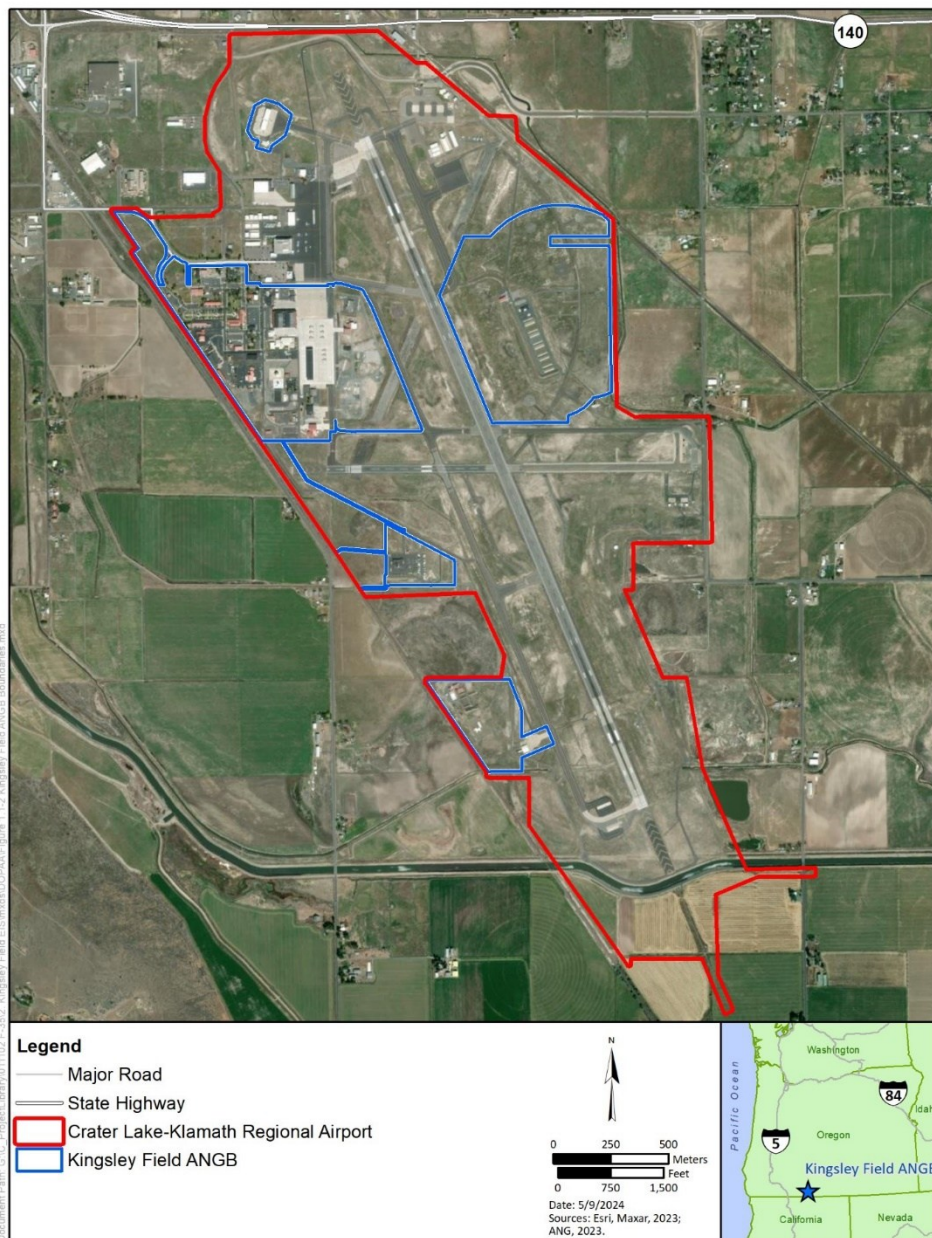
Attachment 2 – Proposed Construction, Renovation, and Demolition Project Tables

**Proposed Demolition Projects**

| <i>Building Number</i>          | <i>Total Area of Demolition (SF)</i> | <i>Year Building was Constructed</i> | <i>Year Proposed for Demolition</i> |
|---------------------------------|--------------------------------------|--------------------------------------|-------------------------------------|
| B209                            | 8,717                                | 1989                                 | 2030                                |
| B213                            | 15,271                               | 1959                                 | 2030                                |
| B215                            | 2,400                                | 1959                                 | 2030                                |
| B219                            | 83,305                               | 1959                                 | 2026                                |
| B230                            | 2,926                                | 1959                                 | 2026                                |
| B231                            | 2,916                                | 1958                                 | 2026                                |
| B242                            | 2,830                                | 1961                                 | 2026                                |
| B243                            | 32,570                               | 1987                                 | 2030                                |
| B334                            | 3,772                                | 1987                                 | 2029                                |
| B500                            | 12,112                               | 1957                                 | 2030                                |
| B540                            | 5,450                                | 1959                                 | 2030                                |
| B541                            | 5,450                                | 1959                                 | 2026                                |
| <b>Total SF of Demolition =</b> | <b>177,719</b>                       |                                      |                                     |

*Legend:* B = Building; SF = square feet.

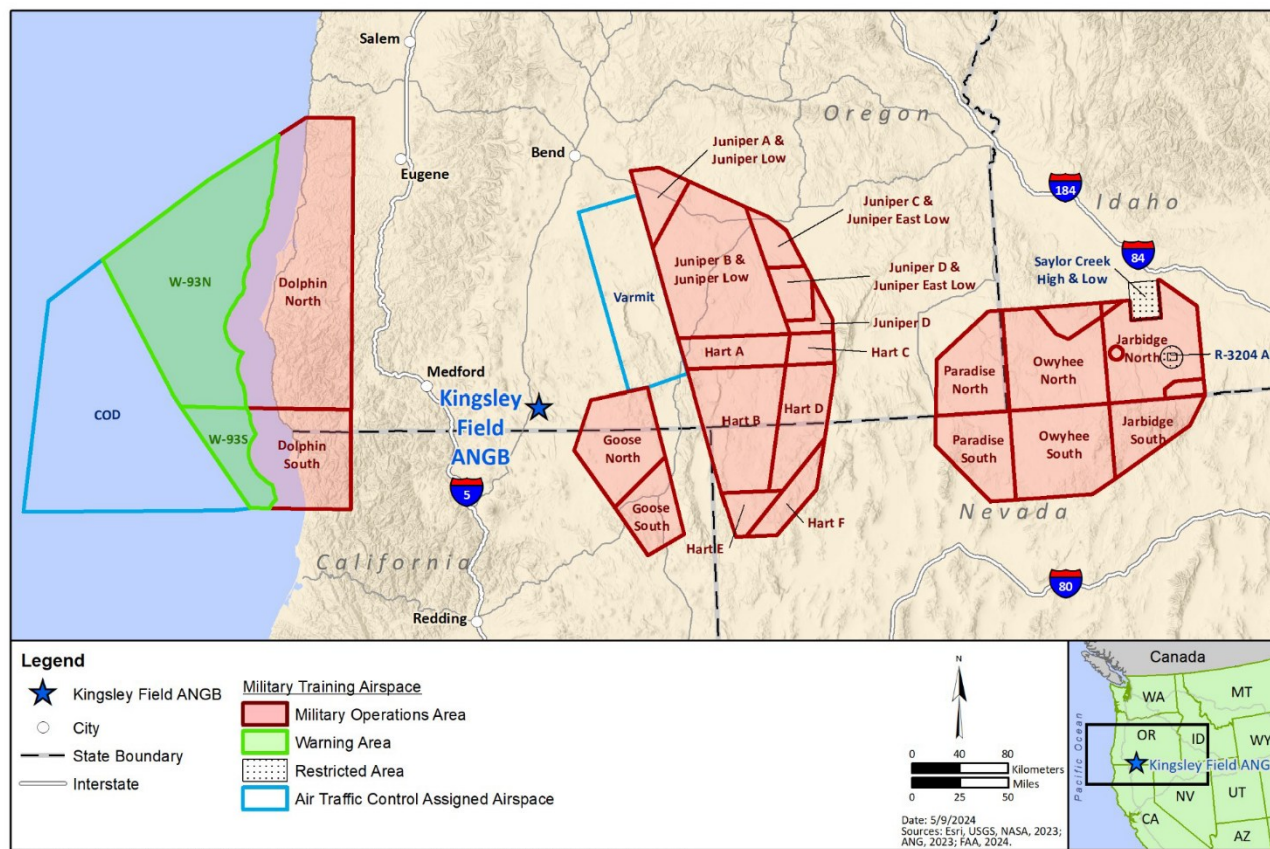
Attachment 3 – Kingsley Field ANGB Area of Potential Effects





**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 4 – Kingsley Field ANGB Military Training Airspace





**Sample Other SHPO Letter**

**NATIONAL GUARD BUREAU**  
3501 FETCHET AVENUE JOINT BASE ANDREWS 20762-5157

6 June 2024

Michelle Kasunic  
Acting Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

Tricia Canaday  
Deputy State Historic Preservation Officer  
Idaho State Historical Society  
2205 Old Penitentiary Rd.  
Boise ID 83712

Dear Ms. Canaday

The National Guard Bureau (NGB) would like to initiate consultation with your office under Section 106 of the National Historic Preservation Act of 1966 (NHPA), and its implementing regulations (36 Code of Federal Regulations [CFR] § 800) on a proposed undertaking at the 173d Fighter Wing (173 FW) Kingsley Field Air National Guard Base (ANGB) located in Klamath Falls, OR (see Attachment 1). The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

Pursuant to National Environmental Policy Act of 1969 (42 United States Code 4321 et seq.), the NGB is preparing an Environmental Impact Statement (EIS) for the 173 FW that will analyze impacts that could significantly affect the quality of the human environment, including those with the potential to affect historic properties, sacred sites, and traditional cultural properties. The purpose of the Proposed Action is to increase F-35A pilot production in support of the National Defense Strategy. The Proposed Action would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission. This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this Proposed Action; however, there could be an increase in operations within the airspace.

An Area of Potential Effects (APE) is defined in 36 CFR § 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The NGB has reviewed the undertaking and defined the APE as the jurisdictional boundary of Kingsley Field ANGB, areas affected by noise levels of 65 dB DNL

and greater from the aircraft operations, and lands located beneath existing military training airspace from surface level to the top of each airspace designation plus a 1-mile horizontal buffer (Attachment 2). The NGB will consult with the Oregon State Historic Preservation Office on matters pertaining to the undertaking at Kingsley Field ANGB. As the EIS develops to include results from the noise study, NGB will continue to consult with your office regarding any possible changes to the APE identified in this initial notification letter.

In accordance with 36 CFR § 800.4(a)(1), we are providing your office with this opportunity to comment on our proposed APE for this undertaking, that is, the area beneath the airspace overlying Idaho. Please respond in writing to the NGB within thirty (30) days. Comments may be addressed to Michelle Kasunic, Acting Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil](mailto:NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil) with the subject titled as ATTN: 173 FW EIS. We look forward to continuing consultation for the proposed undertaking, and we thank you for your assistance.

Sincerely,



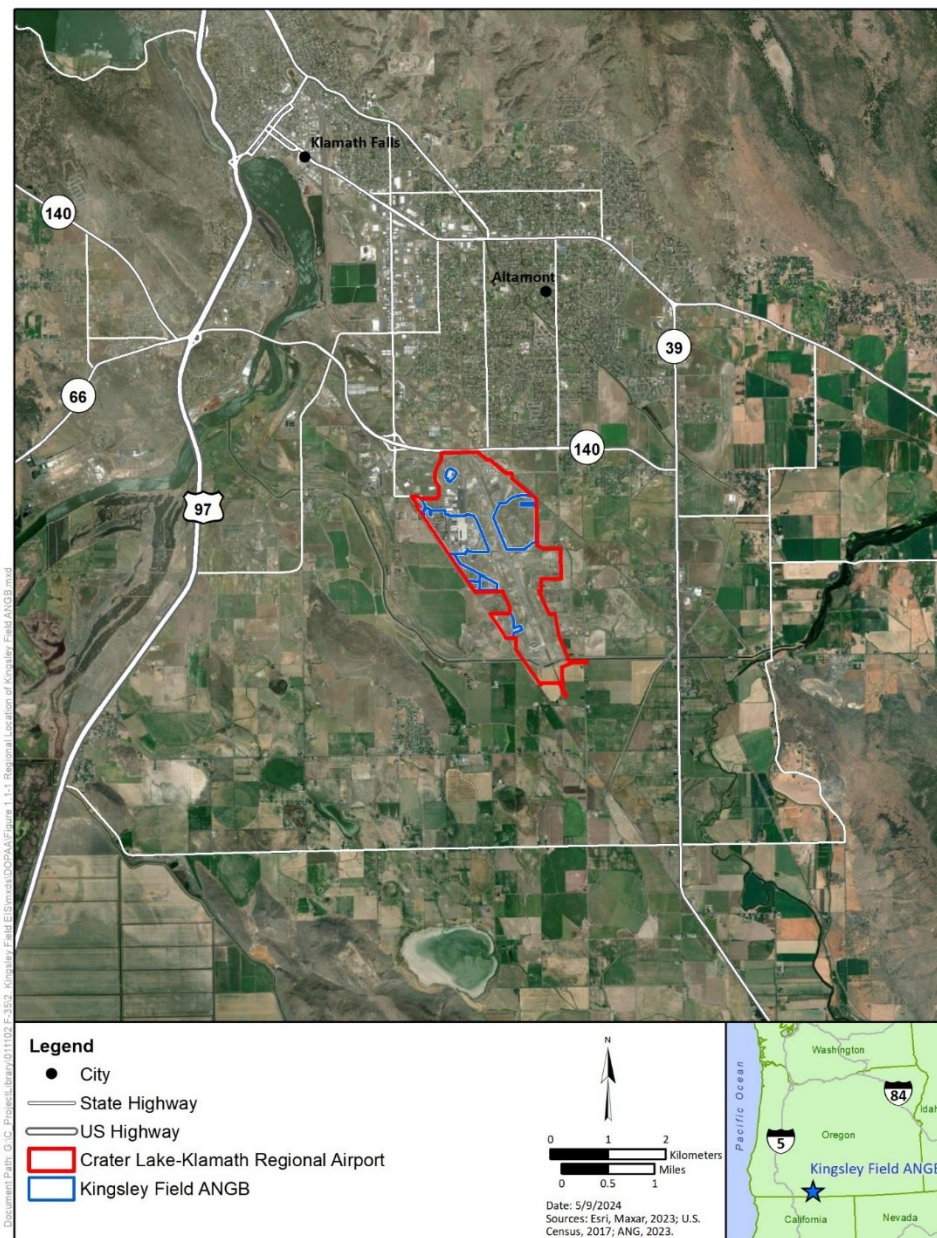
Michelle Kasunic, GS-13, DAF  
Acting Cultural Resources Program Manager

Attachments:

1. Regional Location Map of Kingsley Field ANGB
2. Kingsley Field ANGB Military Training Airspace Map

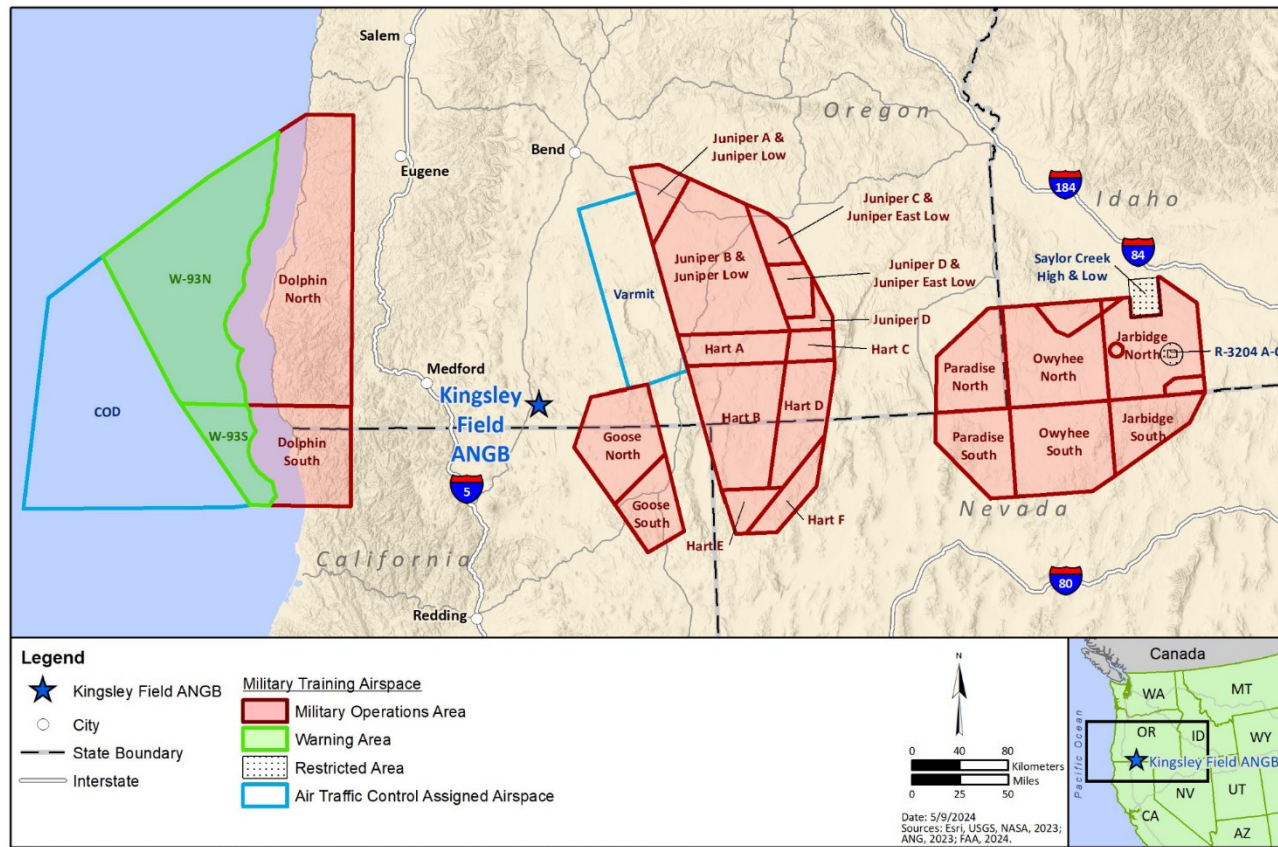


Attachment 1 - Regional Location Map of Kingsley Field ANGB



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 - Kingsley Field ANGB Military Training Airspace





**NATIONAL GUARD BUREAU**  
3501 FETCHET AVENUE JOINT BASE ANDREWS 20762-5157

03 Mar 2025

J. Rocco de Gregory, RPA  
Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

Julianne Polanco  
State Historic Preservation Officer  
California Office of Historic Preservation  
1725 23rd Street, Suite 100  
Sacramento CA 95816

Subject: Continuing Section 106 Consultation; Draft Environmental Impact Statement for  
Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard  
Base, Klamath Falls, Oregon

Dear Ms. Polanco

The National Guard Bureau (NGB) is proposing the beddown and operation of F-35A aircraft to replace the aging F-15C/D fleet at the 173rd Fighter Wing (173 FW), Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon (Attachment 1). This proposal also includes the necessary facility improvements and construction required to support the mission. The NGB has determined that the proposed Federal action is an undertaking as defined in 36 Code of Federal Regulations (CFR) Section 800.16(y) and it is a type of activity that has the potential to cause effects on historic properties.

NGB has prepared a Preliminary Draft Environmental Impact Statement (EIS) under the National Environmental Policy Act of 1969 (NEPA) to evaluate potential environmental effects associated with the proposed Federal action alternatives. The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

The NGB is conducting the environmental analysis for the undertaking in accordance with NEPA, as amended. The Preliminary Draft EIS is available upon request and the Draft EIS is expected to become available on the project website in July 2025 ([www.kingsleyfieldf35eis.com](http://www.kingsleyfieldf35eis.com)).



The NGB initiated consultation with your office on 6 June 2024. The purpose of this letter is to continue consultation pursuant to the terms of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations found at 36 CFR Section 800. This letter serves to identify historic properties within the Area of Potential Effects (APE) for the undertaking and gauge project effects located within the bounds of the proposed undertaking.

#### **The Proposed Undertaking**

The purpose of the proposed undertaking is to increase F-35A pilot production in support of the National Defense Strategy. The proposed undertaking would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission. This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this proposed undertaking; however, there could be an increase in operations within the airspace.

The beddown process would occur in phases associated with the manufacture and delivery of the F-35A aircraft. Delivery of the first aircraft to Kingsley Field would occur in Fiscal Year (FY) 2027. Delivery of the final aircraft would be expected in FY 2029, at which time the full complement of up to 24 Primary Aerospace Vehicle Authorized (PAA) (plus 2 Backup Aerospace Vehicle Authorized [BAA]) F-35A aircraft would be based at Kingsley Field.

To provide the training needed to ensure combat readiness, F-35A aircrews would conduct operations in two types of areas: (1) an airfield associated with the installation, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A would use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures.

#### **The No Action Alternative**

Under the No Action Alternative, the 173 FW would continue to conduct their current mission using existing F-15C/D aircraft. Any construction and repair projects required for the current mission would be implemented. Implementation of the No Action Alternative would include the interior renovation of Buildings 130 and 302. It would include the interior renovation of Buildings 220, 221, and 234 if alternate options are chosen.

#### **Area of Potential Effects (36 CFR Section 800.4(a)(1))**

An APE is defined in 36 CFR Section 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The NGB has reviewed the undertaking and defined the APE for the proposed undertaking specific to



the state of California as the lands located beneath existing military training airspace from surface level to the ceiling of each airspace designation plus a 1-mile horizontal buffer. Attachment 1 includes a map of the APE.

**Identification of Listed Historic Properties (36 CFR Section 800.4(b))**

Information on cultural resources within the APE was derived from conducting background research using the National Register of Historic Places (NRHP) Information Database to identify NRHP-listed properties beneath the affected airspace that can include national historic landmarks, cultural landscapes, national monuments, historic trails, and historic battlefields within the same area.

Twenty-four listed historic properties are located on lands beneath the existing airspace associated with 173 FW in California (Attachment 2). The listed historic properties in California include 15 archaeological sites, a shipwreck, a light station, a lighthouse, Gasquet Ranger Station Historic District, a schoolhouse, a catholic church, a carpenter and paint shop associated with the Tule Lake Segregation Center, the Nevada-California-Oregon Railway Depot, and a Nevada-California-Oregon Railway general office building (National Park Service [NPS] 2024a, 2024b). Twelve California State Historic Landmarks are located beneath the military training airspace (see Attachment 2). These historic landmarks are titled: Applegate-Lassen Trail, Battery Point Lighthouse, Battle of Land's Ranch-1872, Brother Jonathan Cemetery, Camp Lincoln, Evans and Baily Fight, Fort Ter-Wer Site, Fremont's Camp, Indian Village Site, Infernal Caverns Battleground, Pioneer Stage Road to Oregon, and S.S. Emidio (NoeHill 2024).

NGB invited 44 Tribal Nations who may have cultural or historical ties to lands beneath the airspace to consult on this proposed undertaking. Of the 44 Tribal Nations, NGB received responses from 7 Tribal Nations. Government-to-government consultation with associated Tribal Nations is ongoing and will continue throughout the Environmental Impact Analysis Process.

**Results of Identification and Evaluation (36 CFR Section 800.4(d))**

Because the proposed undertaking in California is an airspace action, only those historic properties that would reasonably be affected by visual (overflights, chaff and flares) and noise intrusions are considered. These include architectural resources, archaeological resources with standing buildings or structures, and traditional cultural properties and sacred sites.

Under the Proposed Action, the F-35A would use a very similar altitude profile as the F-15C/D in training; however, the F-35A would utilize altitudes above 20,000 feet mean sea level (MSL) 16 percent more than the F-15C/D currently does. The use of low altitudes (between 500 feet above ground level [AGL] and 10,000 feet MSL) would remain approximately the same as it currently is.

In general, noise from the F-35A would be 3 to 5 decibels (dB) greater in terms of sound exposure level (SEL) and 6 to 8 dB greater in maximum sound level ( $L_{max}$ ) when compared to the F-15C/D while operating in military power and 400 knots. The greatest Day-Night Average Sound Level (DNL)/Onset-Rate Adjusted Day-Night Average Sound Level ( $L_{dnmr}$ ) of 49 dB would occur in Juniper Low, Juniper East Low, Goose North, and Goose South Military Operations Areas (MOAs) due to a combination of an increase in operations in Goose and the lower airspace floor and lower altitudes in Juniper Low and Juniper East Low MOAs. The remainder of the Juniper and Hart complex outside of the Juniper Low and Juniper East Low areas would experience DNL/ $L_{dnmr}$  of 40 dB. The DNL/ $L_{dnmr}$  in Dolphin North and South MOA would be less than 35 dB due to the relatively small number of sorties spread over a large area with a minimum altitude of 11,000 feet MSL. Overall, there would be an increase in DNL/ $L_{dnmr}$  of 2 to 5 dB across the airspace, except Dolphin North and South MOAs that would experience a negligible change from the No Action Alternative. Based on noise level calculations for lands beneath the military training airspace, there would be no significant effects on archaeological resources, historic structures, or traditional cultural properties as a result of the implementation of the proposed undertaking.

Due to the high altitude of the overflights, small size of the aircraft, and the high speeds, the aircraft would not be readily visible to observers on the ground. Therefore, visual intrusions would be minimal and would not represent an increase sufficient to cause adverse effects on the settings of cultural resources.

No additional ground disturbance would occur under the airspace and use of ordnance and defensive countermeasures would occur in areas already used for these activities. The 173 FW would adhere to local operating procedures for chaff and flare release to include the Mountain Home Airspace and restricted airspace associated with the Saylor Creek Range (Department of the Air Force [DAF] 2023). Overall, flares are unlikely to adversely affect cultural resources. Therefore, the introduction of material to archaeological sites or standing structures from the use of flares would not have an adverse effect on these resources.

### **Conclusion**

The NGB has determined that the implementation of the undertaking warrants a finding of *No historic properties affected* per 36 CFR Section 800.4(d)(1) with respect to historic properties located beneath the military training airspace in California. The 173 FW and NGB invite you to comment on our identification of historic properties and our determination of effects. In addition to your office, NGB is consulting with federally recognized Tribal Nations who may have current or historical interests in the area.

Please respond in writing to the NGB within thirty (30) days. Comments may be addressed to J. Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [NGB.CCA4F.NEPACOMMENTSorg@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTSorg@us.af.mil) with the subject titled as ATTN: 173 FW EIS. We look forward to continuing consultation for the proposed undertaking, and we thank you for your assistance.

Sincerely,

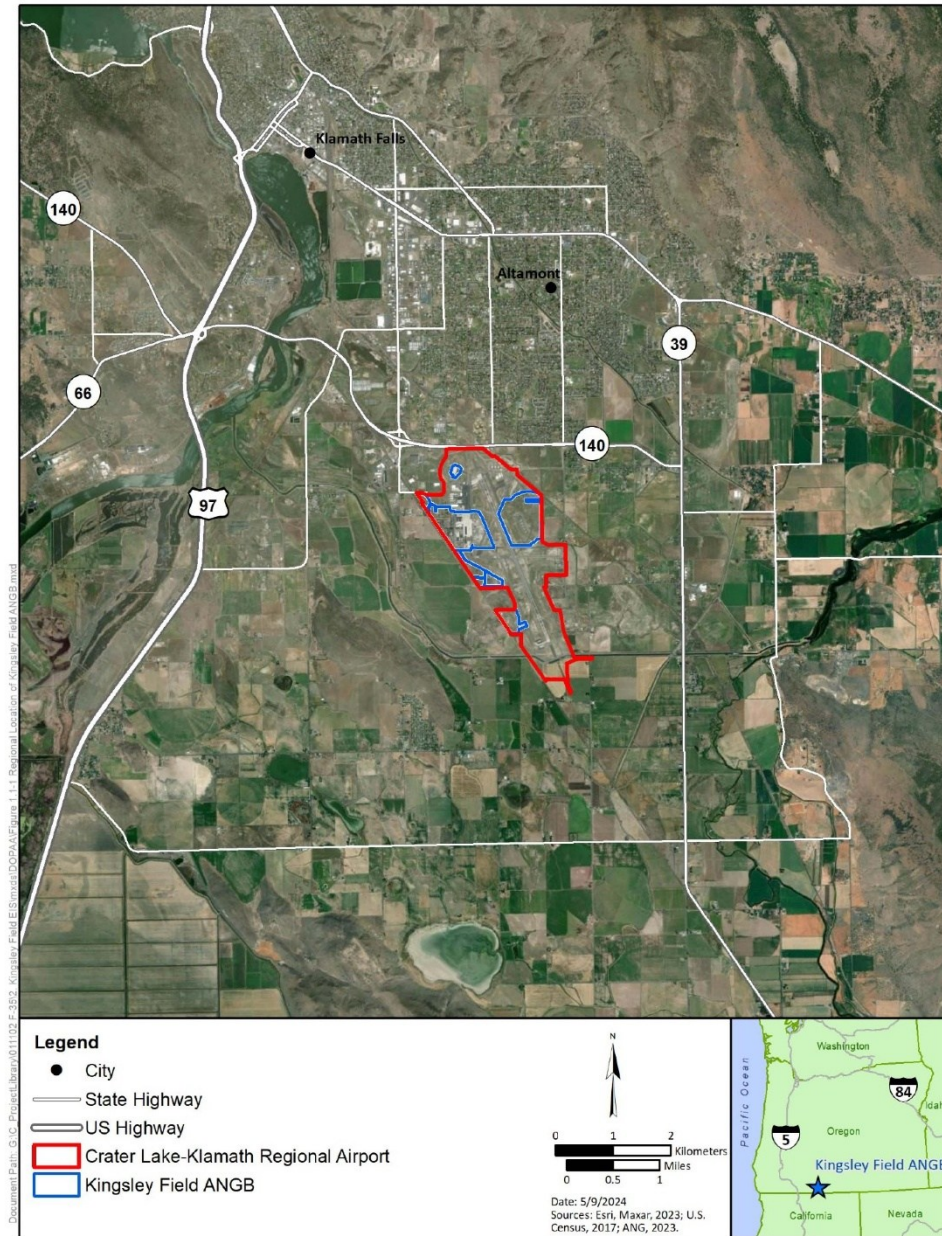


J. Rocco de Gregory, RPA, GS-13, DAF  
Cultural Resources Program Manager

Attachments:

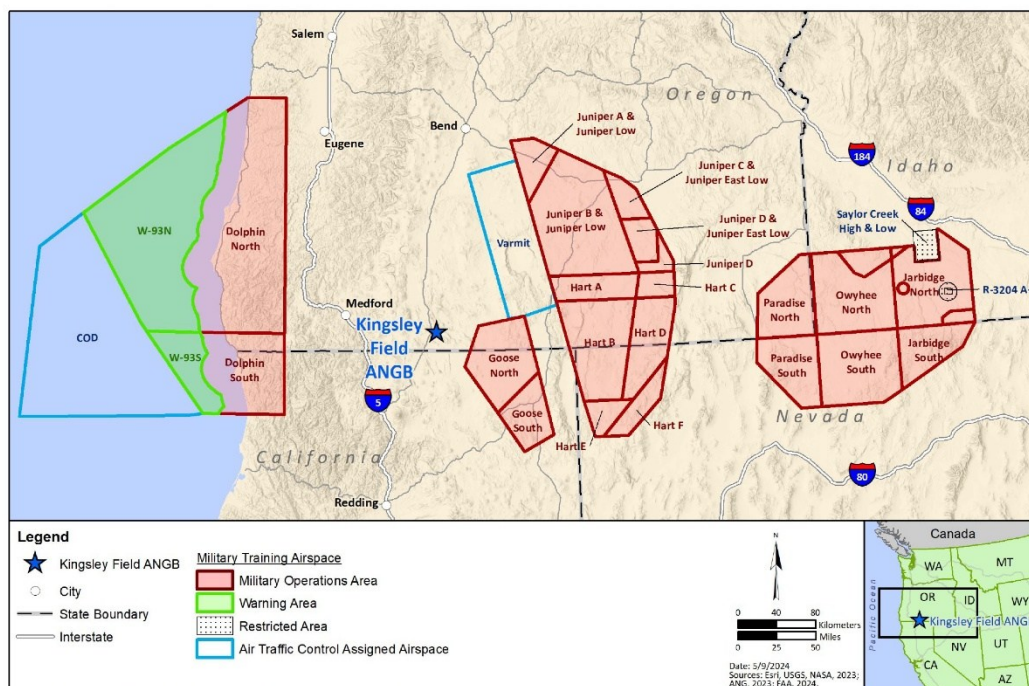
1. Maps
2. Table of Historic Properties
3. References Cited

Attachment 1 - Regional Location Map of Kingsley Field ANGB



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 - Kingsley Field ANGB Military Training Airspace





**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 – Table of NRHP & State Listed Sites

| <b>Resource Name</b>                                         | <b>County</b> | <b>City</b>                    |
|--------------------------------------------------------------|---------------|--------------------------------|
| <i>Dolphin South MOA</i>                                     |               |                                |
| National Register Listed                                     |               |                                |
| Brother Jonathan (Shipwreck Site)                            | Del Norte     | Crescent City                  |
| Crescent City Lighthouse                                     | Del Norte     | Crescent City                  |
| Ender's Beach Archeological Sites                            | Del Norte     | Crescent City                  |
| Gasquet Ranger Station Historic District                     | Del Norte     | Gasquet                        |
| Mus-yeh-sait-neh Village and Cultural Landscape Property     | Del Norte     | Gasquet                        |
| Point St. George Site                                        | Del Norte     | Crescent City                  |
| St. George Reef Light Station                                | Del Norte     | Crescent City                  |
| Yontocket Historic District                                  | Del Norte     | Fort Dick                      |
| State Register Listed                                        |               |                                |
| Battery Point Lighthouse                                     | Del Norte     | Crescent City                  |
| Brother Jonathan Cemetery                                    | Del Norte     | Crescent City                  |
| Camp Lincoln                                                 | Del Norte     | Crescent City                  |
| Fort Ter-Wer Site                                            | Del Norte     | Klamath Glen                   |
| Indian Village Site                                          | Del Norte     | Crescent City                  |
| Pioneer State Road to Oregon                                 | Del Norte     | Crescent City                  |
| SS. Emidio                                                   | Del Norte     | Crescent City                  |
| <i>Goose South MOA</i>                                       |               |                                |
| National Register Listed                                     |               |                                |
| Anklin Village Archeological Site                            | Modoc         | Canby                          |
| Black Cow Spring                                             | Modoc         | Canby                          |
| Core Site                                                    | Modoc         | Canby                          |
| Cuppy Cave                                                   | Modoc         | Canby                          |
| Jess Valley Schoolhouse                                      | Modoc         | Likely                         |
| Mildred Ann Archeological Site                               | Modoc         | Canby                          |
| Nelson Springs                                               | Modoc         | Likely                         |
| Nevada-California-Oregon Railway Depot                       | Modoc         | Alturas                        |
| Nevada-California-Oregon Railway Co. General Office Building | Modoc         | Alturas                        |
| Sacred Heart Catholic Church                                 | Modoc         | Alturas                        |
| Seven Mile Flat Site                                         | Modoc         | Devil's Garden Ranger District |
| Skull Ridge                                                  | Modoc         | Canby                          |
| Skull Spring                                                 | Modoc         | Canby                          |
| State Register Listed                                        |               |                                |
| Applegate-Lassen Trail                                       | Modoc         | Fort Bidwell                   |
| Evans and Baily Fight                                        | Modoc         | Canby                          |
| Infernal Caverns Battleground                                | Modoc         | Likely                         |
| Battle of Land's Ranch- 1872                                 | Modoc         | Tulelake                       |
| <i>Goose North MOA</i>                                       |               |                                |

Attachment 2 – Table of NRHP & State Listed Sites

| <b><i>Resource Name</i></b>                                     | <b><i>County</i></b> | <b><i>City</i></b> |
|-----------------------------------------------------------------|----------------------|--------------------|
| <b>National Register Listed</b>                                 |                      |                    |
| Carpenter and Paint Shop (Part of Tule Lake Segregation Center) | Modoc                | Newell             |
| Fern Cave Archeological Site*                                   | Modoc                | Tule Lake          |
| Petroglyph Point Archeological Site*                            | Modoc                | Tule Lake          |
| <b>State Register Listed</b>                                    |                      |                    |
| Fremont's Camp                                                  | Modoc                | Tule Lake          |

*Notes:* \*Possibly located within Goose North MOA; address is restricted so we cannot be 100% certain that this site is located beneath the airspace.



Attachment 3 – References Cited

Department of the Air Force (DAF)

2023    Airspace Optimization for Readiness EIS for Mountain Home AFB.

National Park Service (NPS)

2024a   National Register of Historic Places Spatial Data. Last updated 19 April 2024.

2024b   National Register of Historic Places Spreadsheet of Everything. Last updated 10 July 2024.

NoeHill

2024    List of State Historic Landmarks and Points of Interest. Accessed 19 June 2024 at:

<https://noehill.com/sitemap.asp>.



State of California • Natural Resources Agency

Gavin Newsom, Governor

**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer  
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100  
Telephone: (916) 445-7000 FAX: (916) 445-7053  
calshpo.ohp@parks.ca.gov [www.ohp.parks.ca.gov](http://www.ohp.parks.ca.gov)

April 24, 2025

Reply in Reference to: USAF\_2025\_0303\_001

J. Rocco de Gregory, RPA  
Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

VIA ELECTRONIC MAIL

Re: Section 106 Consultation for Basing F-35A Lightning II Formal Training Unit at  
Kingsley Field Air National Guard Base, Klamath Falls, Oregon

Dear Mr. de Gregory:

The National Guard Bureau (NGB) is initiating consultation with the State Historic Preservation Officer (SHPO) regarding its effort to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. 306108), as amended, and its implementing regulation found at 36 CFR Part 800.

The NGB is proposing to use California airspace in association with F-35A beddown activities in Oregon. Additional details may be found in the NGB's consultation documents. The NGB determined that the "implementation of the undertaking warrants a finding of no historic properties affected per 36 CFR Section 800.4(d)(1) with respect to historic properties located beneath the military training airspace in California." The SHPO does not object to this finding of effect.

This letter is being sent in electronic format only. Please confirm receipt of this letter and notify Ed Carroll, Historian II, at [Ed.Carroll@parks.ca.gov](mailto:Ed.Carroll@parks.ca.gov) or (916) 503-8466 if there are any questions or to request a hard copy of this letter.

Sincerely,

A handwritten signature in blue ink, appearing to be "Julianne Polanco".

Julianne Polanco  
State Historic Preservation Officer



**NATIONAL GUARD BUREAU**  
3501 FETCHET AVENUE JOINT BASE ANDREWS 20762-5157

03 Mar 2025

J. Rocco de Gregory, RPA  
Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

Tricia Canaday  
Deputy State Historic Preservation Officer  
Idaho State Historical Society  
2205 Old Penitentiary Rd.  
Boise ID 83712

Subject: Continuing Section 106 Consultation; Draft Environmental Impact Statement for  
Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard  
Base, Klamath Falls, Oregon

Dear Ms. Canaday

The National Guard Bureau (NGB) is proposing the beddown and operation of F-35A aircraft to replace the aging F-15C/D fleet at the 173rd Fighter Wing (173 FW), Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon (Attachment 1). This proposal also includes the necessary facility improvements and construction required to support the mission. The NGB has determined that the proposed Federal action is an undertaking as defined in 36 Code of Federal Regulations (CFR) Section 800.16(y) and it is a type of activity that has the potential to cause effects on historic properties.

NGB has prepared a Preliminary Draft Environmental Impact Statement (EIS) under the National Environmental Policy Act to evaluate potential environmental effects associated with the proposed Federal action alternatives. The Federal Aviation Administration (FAA) is a cooperating agency because the 173 FW is located on a civilian airfield where the FAA would have a federal action in approving changes to the Airport Layout Plan.

The NGB is conducting the environmental analysis for the undertaking in accordance with NEPA, as amended. The Preliminary Draft EIS is available upon request and the Draft EIS is expected to become available on the project website in July 2025 ([www.kingsleyfieldf35eis.com](http://www.kingsleyfieldf35eis.com)).

The NGB initiated consultation with your office on 6 June 2024. The purpose of this letter is to continue consultation pursuant to the terms of Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations found at 36 CFR Section 800. This letter serves to identify historic properties within the Area of Potential Effects (APE) for the undertaking and gauge project effects located within the bounds of the proposed undertaking.

### **The Proposed Undertaking**

The purpose of the proposed undertaking is to increase F-35A pilot production in support of the National Defense Strategy. The proposed undertaking would include the beddown and operation of the F-35A to replace the F-15C/D fleet at the 173 FW, as well as the required facility improvements and construction necessary to support the mission. This beddown action and associated training would ensure availability of combat-ready pilots in the most advanced fighter aircraft in the world. Pilots operating the aircraft would conduct training from the installation and in existing military training airspace associated with the 173 FW installation. There would be no modifications to the existing military training airspace under this proposed undertaking; however, there could be an increase in operations within the airspace.

The beddown process would occur in phases associated with the manufacture and delivery of the F-35A aircraft. Delivery of the first aircraft to Kingsley Field would occur in Fiscal Year (FY) 2027. Delivery of the final aircraft would be expected in FY 2029, at which time the full complement of up to 24 Primary Aerospace Vehicle Authorized (PAA) (plus 2 Backup Aerospace Vehicle Authorized [BAA]) F-35A aircraft would be based at Kingsley Field.

To provide the training needed to ensure combat readiness, F-35A aircrews would conduct operations in two types of areas: (1) an airfield associated with the installation, and (2) training ranges and military training airspace. Additionally, pilots flying the F-35A would use ground-based flight simulators extensively. Simulator training includes all facets of flight operations and comprehensive emergency procedures.

### **The No Action Alternative**

Under the No Action Alternative, the 173 FW would continue to conduct their current mission using existing F-15C/D aircraft. Any construction and repair projects required for the current mission would be implemented. Implementation of the No Action Alternative would include the interior renovation of Buildings 130 and 302. It would include the interior renovation of Buildings 220, 221, and 234 if alternate options are chosen.

### **Area of Potential Effects (36 CFR Section 800.4(a)(1))**

An APE is defined in 36 CFR Section 800.16(d) as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The NGB has reviewed the undertaking and defined the APE for the proposed undertaking specific to

the state of Idaho as the lands located beneath existing military training airspace from surface level to the ceiling of each airspace designation plus a 1-mile horizontal buffer. Attachment 1 includes a map of the APE.

**Identification of Listed Historic Properties (36 CFR Section 800.4(b))**

Information on cultural resources within the APE was derived from conducting background research using the National Register of Historic Places (NRHP) Information Database to identify NRHP-listed properties beneath the affected airspace that can include national historic landmarks, cultural landscapes, national monuments, historic trails, and historic battlefields within the same area.

Three listed historic properties are located on lands beneath the existing airspace associated with 173 FW in Idaho. These listed historic properties include the Wickahoney Post Office and Stage Station, Camp Three Forks, and the Camas and Pole Creeks Archaeological District (National Park Service [NPS] 2024a, 2024b). Idaho does not have a State Register of Historic Places.

NGB invited 44 Tribal Nations who may have cultural or historical ties to lands beneath the airspace to consult on this proposed undertaking. Of the 44 Tribal Nations, NGB received responses from 7 Tribal Nations. Government-to-government consultation with associated Tribal Nations is ongoing and will continue throughout the Environmental Impact Analysis Process.

**Results of Identification and Evaluation (36 CFR Section 800.4(d))**

Because the proposed undertaking in Idaho is an airspace action, only those historic properties that would reasonably be affected by visual (overflights, chaff and flares) and noise intrusions are considered. These include architectural resources, archaeological resources with standing buildings or structures, and traditional cultural properties.

Under the Proposed Action, the F-35A would use a very similar altitude profile as the F-15C/D in training; however, the F-35A would utilize altitudes above 20,000 feet mean sea level (MSL) 16 percent more than the F-15C/D currently does. The use of low altitudes (between 500 feet above ground level [AGL] and 10,000 feet MSL) would remain approximately the same as it currently is.

In general, noise from the F-35A would be 3 to 5 decibels (dB) greater in terms of sound exposure level (SEL) and 6 to 8 dB greater in maximum sound level ( $L_{max}$ ) when compared to the F-15C/D while operating in military power and 400 knots. Overall, there would be an increase in Day-Night Average Sound Level (DNL)/Onset-Rate Adjusted Day-Night Average Sound Level ( $L_{dnmr}$ ) of 2 to 5 dB across the airspace. Based on noise level calculations for lands beneath the military training airspace, there would be no significant effects on archaeological resources, historic structures, or traditional cultural properties as a result of the implementation of the proposed undertaking.

Due to the high altitude of the overflights, small size of the aircraft, and the high speeds, the aircraft would not be readily visible to observers on the ground. Therefore, visual intrusions would be minimal and would not represent an increase sufficient to cause adverse effects on the settings of cultural resources.

No additional ground disturbance would occur under the airspace and use of ordnance and defensive countermeasures would occur in areas already used for these activities. The 173 FW would adhere to local operating procedures for chaff and flare release to include the Mountain Home Airspace and restricted airspace associated with the Saylor Creek Range (Department of the Air Force [DAF] 2023). Overall, flares are unlikely to adversely affect cultural resources. Therefore, the introduction of material to archaeological sites or standing structures from the use of flares would not have an adverse effect on these resources.

### **Conclusion**

The NGB has determined that the implementation of the undertaking warrants a finding of *No historic properties affected* per 36 CFR Section 800.4(d)(1) with respect to historic properties located beneath the military training airspace in Idaho. The 173 FW and NGB invite you to comment on this undertaking and our determination of effects. In addition to your office, NGB is consulting with federally recognized Tribal Nations who may have current or historical interests in the area.

Please respond in writing to the NGB within thirty (30) days. Comments may be addressed to J. Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [NGB.CCA4F.NEPACOMMENTS@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTS@us.af.mil) with the subject titled as ATTN: 173 FW EIS. We look forward to continuing consultation for the proposed undertaking, and we thank you for your assistance.

Sincerely,



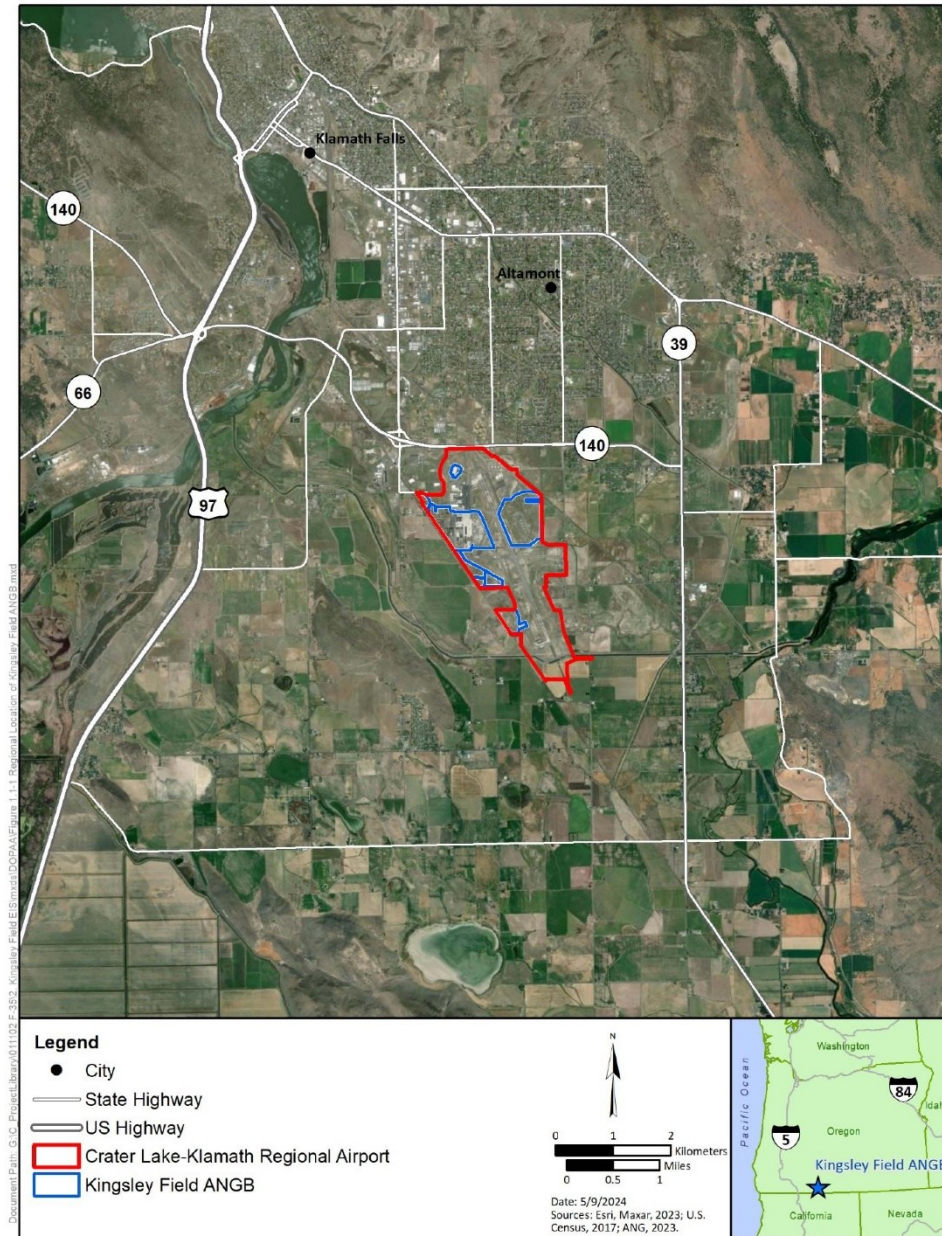
J. Rocco de Gregory, RPA, GS-13, DAF  
Cultural Resources Program Manager

### **Attachments:**

1. Maps
2. References Cited



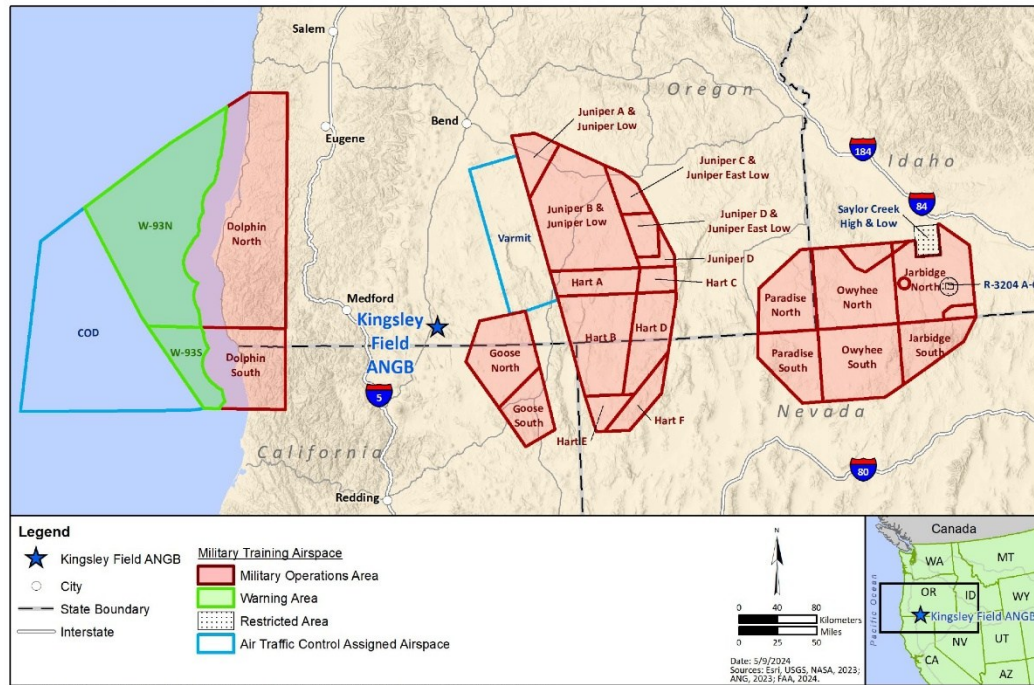
Attachment 1 - Regional Location Map of Kingsley Field ANGB





**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 - Kingsley Field ANGB Military Training Airspace



Attachment 2 – References Cited

Department of the Air Force (DAF)

2023    Airspace Optimization for Readiness EIS for Mountain Home AFB.

National Park Service (NPS)

2024a   National Register of Historic Places Spatial Data. Last updated 19 April 2024.

2024b   National Register of Historic Places Spreadsheet of Everything. Last updated 10 July 2024.



## SHPO Consultation Summary

SHPO Project #2025-469

Any questions please email:

[shpo@ishs.idaho.gov](mailto:shpo@ishs.idaho.gov)

### Section 1: Project Information

|                                                                                                                                                                                                                     |                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Organization Project No(s):<br>011102                                                                                                                                                                               | Project Name:<br>EIS for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base, Klamath Falls, Oregon |
| Lead Federal Agency: Other Federal Agency                                                                                                                                                                           |                                                                                                                                          |
| Project Type: <input checked="" type="checkbox"/> Federal - Section 106 <input type="checkbox"/> Federal - Section 110<br><input type="checkbox"/> CLG Survey <input type="checkbox"/> Determination of Eligibility |                                                                                                                                          |
| Programmatic Agreement Applied:                                                                                                                                                                                     |                                                                                                                                          |

### Section 2: Lead Agency Reviewer(s)

No Lead Agency Reviewers

### Section 3: Additional Organizations

No Secondary Agencies

### Section 4: Project Description

The National Guard Bureau (NGB) is proposing the beddown and operation of F-35A aircraft to replace the aging F-15C/D fleet at the 173rd Fighter Wing (173 FW), Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon. The NGB has reviewed the undertaking and defined the APE for the proposed undertaking specific to the state of Idaho as the lands located beneath existing military training airspace from surface level to the ceiling of each airspace designation plus a 1-mile horizontal buffer.

### Section 5: Final Determination(s) of Eligibility for Listing in the National Register of Historic Places

#### SHPO Count of Resources

No Resources



## SHPO Consultation Summary

SHPO Project #2025-469

Any questions please email:

[shpo@ishs.idaho.gov](mailto:shpo@ishs.idaho.gov)

| Smithsonian Number(s) | Property Type/Name | SHPO Determination |
|-----------------------|--------------------|--------------------|
| No Resources          |                    |                    |
| SHPO Comments:        |                    |                    |

### Section 6: Agency Finding of Effect

☒ No Historic Properties Affected [36 CFR § 800.4(d)(1)]

☐ No Adverse Effect [36 CFR § 800.5(d)(1)]

☐ Adverse Effect [36 CFR § 800.5(d)(2)]

Agency Comments/Summary:

### Section 7: Official SHPO Response

The Idaho SHPO has reviewed the documentation and recommendations provided by Other Federal Agency:

Project Finding of Effect:

☒ We concur with the finding of effect of No Properties/No Effect and with the conditions of compliance (if applicable).

☐ We concur with the finding of effect of No Properties/No Effect, given stipulations explained below.

☐ We disagree with the finding of effect of No Properties/No Effect, as explained below or in the attached letter.

☐ No Comment

*Tricia Canaday*

Date 03/14/2025

Deputy State Historic Preservation Officer

SHPO Comments:



**NATIONAL GUARD BUREAU**  
3501 FETCHET AVENUE JOINT BASE ANDREWS 20762-5157

03 Mar 2025

J. Rocco de Gregory, RPA  
Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

Rebecca Palmer  
State Historic Preservation Officer  
Nevada State Historic Preservation Office  
901 South Stewart, Suite 5004  
Carson City NV 89701

Subject: Continuing Section 106 Consultation; Draft Environmental Impact Statement for  
Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard  
Base, Klamath Falls, Oregon

Dear Ms. Palmer

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Three listed historic properties are located on lands beneath the existing airspace associated with 173 FW in Nevada. The three listed historic properties include Gold Creek Ranger Station, Silver State Flour Mill, and the Applegate-Lassen Trail. The Applegate-Lassen Trail is located beneath three military training airspace units (Hart B Military Operations Area [MOA], Hart E MOA, and Hart F MOA) (National Park Service [NPS] 2024a, 2024b). Four Nevada State Historic Landmarks are located beneath the military training airspace. These historic landmarks are titled: Camp McGarry, Town of Jarbidge, Jarbidge Community Hall, and Fort McDermitt (NoeHill 2024).

NGB invited 44 Tribal Nations who may have cultural or historical ties to lands beneath the airspace to consult on this proposed undertaking. Of the 44 Tribal Nations, NGB received responses from 7 Tribal Nations. Government-to-government consultation with associated Tribal Nations is ongoing and will continue throughout the Environmental Impact Analysis Process.

**Results of Identification and Evaluation (36 CFR Section 800.4(d))**

Because the proposed undertaking in Nevada is an airspace action, only those historic properties that would reasonably be affected by visual (overflights, chaff and flares) and noise intrusions are considered. These include architectural resources, archaeological resources with standing buildings or structures, and traditional cultural properties.

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### **Conclusion**

The NGB has determined that the implementation of the undertaking warrants a finding of *No historic properties affected* per 36 CFR Section 800.4(d)(1) with respect to historic properties located beneath the military training airspace in Nevada. The 173 FW and NGB invite you to comment on this undertaking and our determination of effects. In addition to your office, NGB is consulting with federally recognized Tribal Nations who may have current or historical interests in the area.

Please respond in writing to the NGB within thirty (30) days. Comments may be addressed to J. Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157 or by email at [NGB.CCA4F.NEPACOMMENTS@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTS@us.af.mil) with the subject titled as ATTN: 173 FW EIS. We look forward to continuing consultation for the proposed undertaking, and we thank you for your assistance.

Sincerely,

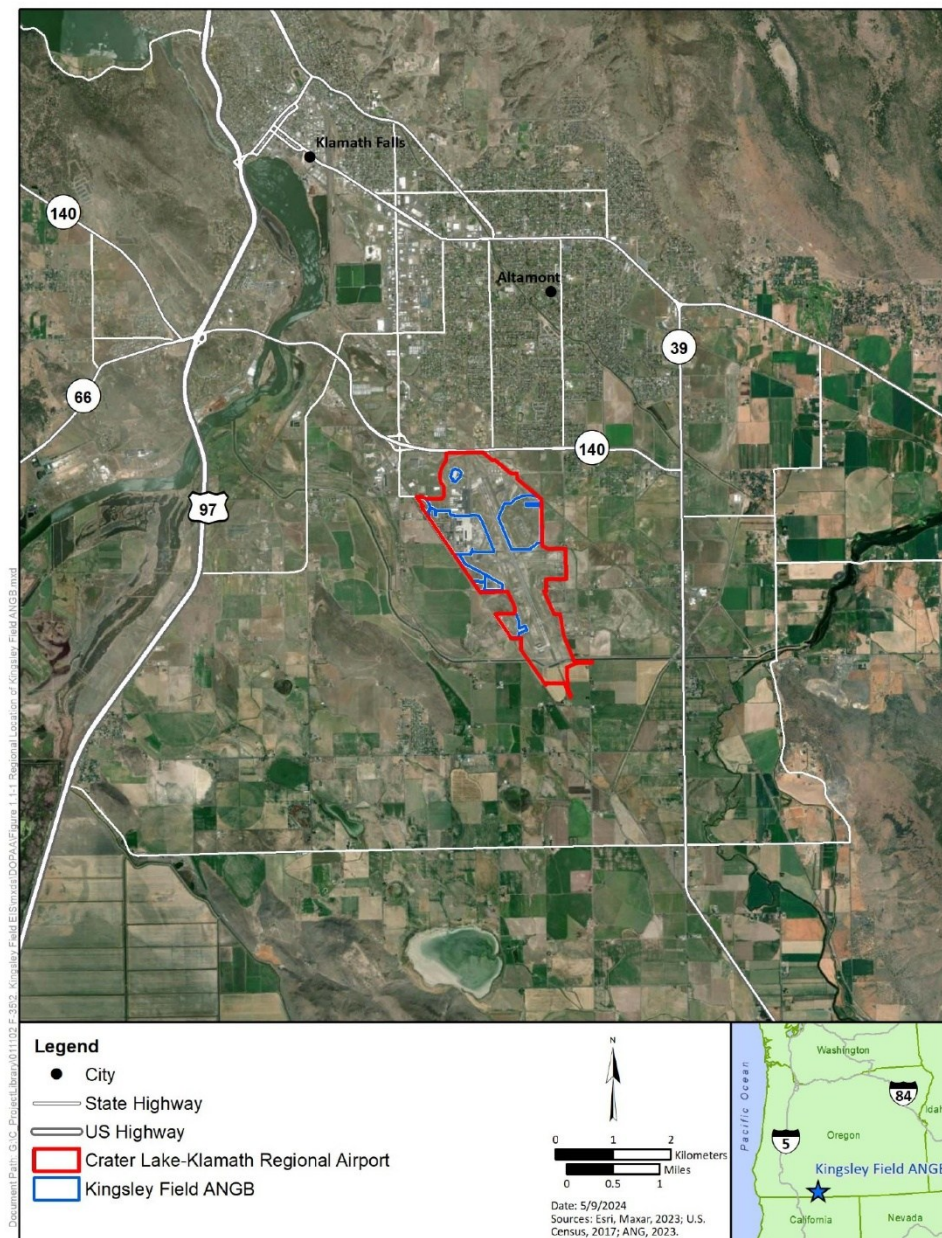


J. Rocco de Gregory, RPA, GS-13, DAF  
Cultural Resources Program Manager

### **Attachments:**

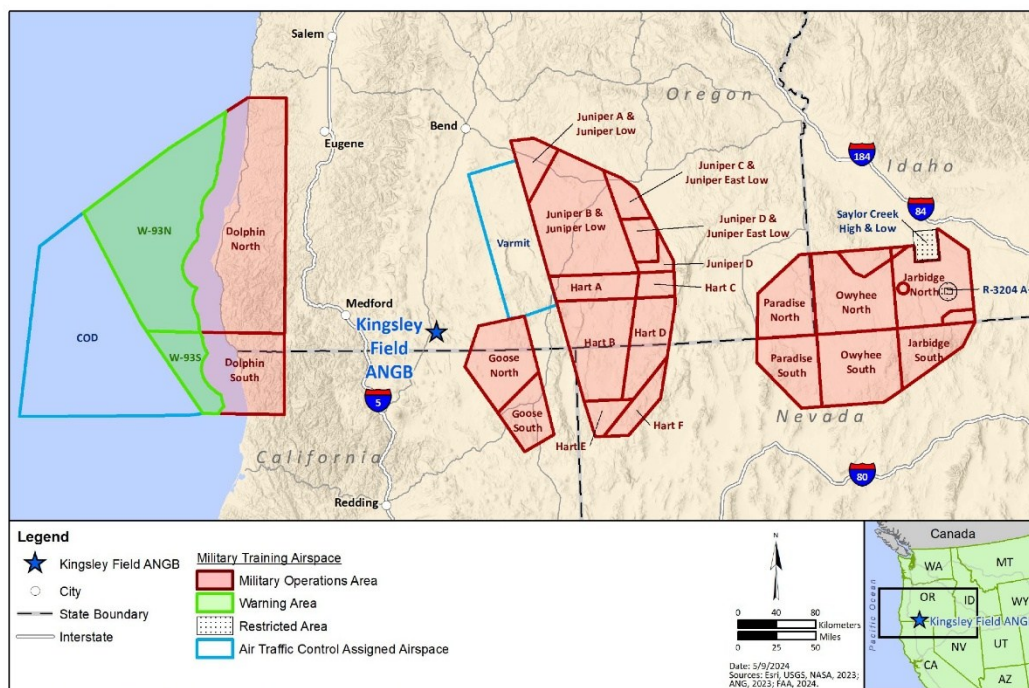
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Attachment 1 - Regional Location Map of Kingsley Field ANGB



**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

Attachment 2 - Kingsley Field ANGB Military Training Airspace



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NoeHill

2024    List of State Historic Landmarks and Points of Interest. Accessed June 19, 2024 at:

<https://noehill.com/sitemap.asp>.



**From:** Georgie De Antoni <[gdeantoni@shpo.nv.gov](mailto:gdeantoni@shpo.nv.gov)>  
**Sent:** Friday, April 3, 2026 8:07 PM  
**To:** DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <[joseph.de\\_gregory@us.af.mil](mailto:joseph.de_gregory@us.af.mil)>  
**Subject:** [Non-DoD Source] RE: Continuing Section 106 Consultation; Draft Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base, Klamath Falls, Oregon

Hello Mr. De Gregory-

It was nice speaking with you yesterday, my apologies for the slow turn around.

I can confirm that the SHPO received the NGB's submittal on March 6, 2025.

As the SHPO did not issue a response within the provided review period and in accordance with regulations, the Agency has no further Section 106 responsibilities with the NV SHPO for this undertaking.

Thank you for following up with our office and for your patience while I went through our records.

Sincerely,



**Georgie DeAntoni**  
Review & Compliance Supervisor- Archaeologist  
Nevada State Historic Preservation Office  
Department of Conservation and Natural Resources  
901 S. Stewart Street, Suite 3002, Carson City, Nevada 89701  
[gdeantoni@shpo.nv.gov](mailto:gdeantoni@shpo.nv.gov)  
Office: 775-684-3445  
[Facebook](#) | [Instagram](#) | [LinkedIn](#)





**NATIONAL GUARD BUREAU  
3501 FETCHET AVENUE JOINT BASE ANDREWS,  
MARYLAND 20762-5157**

28 April 2025

J. Rocco de Gregory  
Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews, MD 20762-5157

Chrissy Curran  
Deputy State Historic Preservation Officer  
State Historic Preservation Office  
Oregon Parks and Recreation Department  
725 Summer St, Ste C  
Salem, OR 97301

Dear Ms. Curran,

In a letter dated 06 June 2024, the National Guard Bureau (NGB) provided information regarding the proposed beddown and operation of F-35A aircraft at the 173rd Wing (173 FW) at Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon. This letter provides additional information regarding the NGB's effort to meet its obligations under Section 106 of the National Historic Preservation Act of 1966 (NHPA) and its implementing regulations (36 Code of Federal Regulations [CFR] § 800).

The NGB proposes to bed down and operate F-35A aircraft to replace the aging F-15C/D fleet. To support the new aircraft, the installation will need to demolish, renovate, repair, or expand existing buildings and construct new facilities. Some of the proposed construction will involve activities that will cause ground disturbance. The NGB has determined that the proposed construction activities represent an undertaking as defined in 36 CFR Section 800.16(y), and it is a type of activity that has the potential to affect historic properties. To meet the agency's obligation under Section 106 of NHPA and meet the Oregon State Historic Preservation Office's (SHPO) standards, the NGB is submitting a research design detailing our approach to identifying cultural resources that may be impacted by the proposed undertaking.

We look forward to receiving your office's comments and/or concurrence on the proposed methods. The NGB welcomes the opportunity to consult with OR SHPO at any time during this process. If your office would like to engage in consultation with the NGB regarding this project's associated research design, please respond in writing to the NGB within thirty (30) days.

Comments may be addressed to Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157, or by email at [joseph.de\\_gregory@us.af.mil](mailto:joseph.de_gregory@us.af.mil) with the subject line: ATTN: 173 FW EIS. We look forward to continuing consultation about the proposed undertaking, and we thank you for your assistance.

Sincerely

A handwritten signature in black ink, reading "J. Rocco de Gregory". The signature is fluid and cursive, with the first name "J." and last name "de Gregory" clearly legible.

J. Rocco de Gregory RPA, GS-13, DAF  
Cultural Resources Program Manager





**Oregon**

Tina Kotek, Governor

**Parks and Recreation Department**

Oregon Heritage/  
State Historic Preservation Office  
725 Summer St. NE, Suite C  
Salem, OR 97301-1266  
(503) 986-0690  
Fax (503) 986-0793  
oregonheritage.org



May 30, 2025

Rocco de Gregory  
NGB/A4VN  
3501 Fetchet Ave  
Joint Base Andrews, MD 20762

RE: SHPO Case No. 25-0524

National Guard Bureau EIS for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air  
National Guard Base  
Proposed beddown and operation of F-35A aircraft .  
211 Arnold Ave, Klamath Falls, Klamath County

Dear Rocco de Gregory:

Thank you for submitting information for the undertaking referenced above. We concur with the proposed Area of Potential Effect (APE) and proposed identification efforts. We look forward to receiving documentation of identification efforts, determinations of eligibility for historic properties within or adjacent to the APE, as necessary, and a finding of effect for the undertaking including both direct and indirect effects. If the APE or undertaking changes, notify our office as further consultation may be needed before proceeding with identification efforts.

This letter assumes consultation is underway with all appropriate Native American tribes and interested parties regarding the proposed undertaking especially in reference to Historic Properties of Religious and Cultural Significance to Indian Tribes (HPRCSITs) per 36 CFR Part 800.4(b). Additional consultation regarding this case must be sent through Go Digital. In order to help us track the undertaking accurately, reference the SHPO case number above in all correspondence.

Please contact our office if you have any questions, comments or need additional assistance.

Sincerely,

Kirsten Lopez  
Special Projects Archaeologist  
(503) 400-4810  
Kirsten.Lopez@oprd.oregon.gov

cc: Mark Barron, Ngb/A7AM



**NATIONAL GUARD BUREAU  
AIR NATIONAL GUARD READINESS CENTER  
3501 FETCHET AVENUE  
JOINT BASE ANDREWS, MARYLAND 20762-5157**

02 April 2026

J. Rocco de Gregory  
Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews, MD 20762-5157

Chrissy Curran  
Deputy State Historic Preservation Officer  
State Historic Preservation Office  
Oregon Parks and Recreation Department  
725 Summer St, Ste C  
Salem, OR 97301

Dear Ms. Curran,

The National Guard Bureau (NGB), in coordination with the Department of the Air Force, has prepared a Draft Environmental Impact Statement (Draft EIS) for the proposed basing of the F-35A Lightning II at Kingsley Field Air National Guard Base (ANGB), Klamath Falls, Klamath County, Oregon (reference #: 25-0524). The Proposed Action includes replacing the F-15C/D mission at the 173rd Fighter Wing with the basing and operation of F-35A aircraft, as well as associated facility and infrastructure improvements at Kingsley Field ANGB. The proposal also includes the continued use of existing military training airspace. No changes to the lateral or vertical boundaries of this airspace are proposed.

The Draft EIS evaluates potential impacts on the human and natural environment resulting from the proposed basing and operation of the F-35A squadron, including associated construction, demolition, renovation, and infrastructure improvements. The Draft EIS is available for review at [www.kingsleyfieldf35eis.com](http://www.kingsleyfieldf35eis.com).

The NGB has determined that the proposed action constitutes an undertaking as defined in 36 CFR § 800.16(y) with the potential to affect historic properties. To meet its obligations under Section 106 of the NHPA, the NGB completed a cultural resource survey of the undertaking's Area of Potential Effect (APE). The APE consisted of 11 discontinuous tracts of land totaling approximately 40 acres where the nature and extent of ground disturbance were unknown. In addition to investigating the 11 tracts for archaeological resources, the survey also examined 43 structures to determine their National Register of Historic Places (NRHP) eligibility. As a result of these investigations, the NGB has preliminarily

determined (pending consultation with your office and interested federally recognized Tribes) that no NRHP-eligible archaeological sites are present within the APE, and that Buildings 219, 325, and 400 are eligible individually and as contributing components of a newly identified historic district.

The cultural resources survey of Kingsley Field evaluated properties from three periods of significance: the World War Two era (1942-1946), the Department of the Air Force active-duty Cold War era (1954-1981), and the Air National Guard Cold War era (1981-1991). The survey found that no historic district exists from the World War Two period, and the majority of common support buildings from the subsequent Cold War periods lack the integrity to be considered for a district. However, the survey recommends the establishment of the Kingsley Field Alert Hangar Historic District, eligible for the National Register of Historic Places under Criteria A and C (Attachment 1). This discontinuous district comprises three facilities critical to the Cold War fighter interceptor mission—Building 219 (Maintenance Hangar), Building 325 (Aircraft Shelter), and Building 400 (Alert Hangar)—with a collective period of significance from 1959 to 1991.

Pending your concurrence regarding the Kingsley Field Alert Hangar Historic District's eligibility, the NGB has determined that the proposed undertaking will have an adverse effect on Building 219 and the proposed district due to its planned renovation/alteration. Should your office concur with these findings, the NGB requests a meeting to consult on possible mitigation efforts to fulfill our obligations under Section 106 of the NHPA.

As a valued consulting party, the NGB formally requests your review and comment on the Draft EIS and your review and concurrence with our NRHP determinations. Please note that Comments must be received no later than 11 May 2026 for consideration in the Final EIS. We are available to meet to discuss the project and answer any questions. If you have questions, please contact J. Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), at ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157, or by email at [NGB.CCA4F.NEPACOMMENTSorg@us.af.mil](mailto:NGB.CCA4F.NEPACOMMENTSorg@us.af.mil) with the subject titled as ATTN: 173 FW EIS.

Sincerely

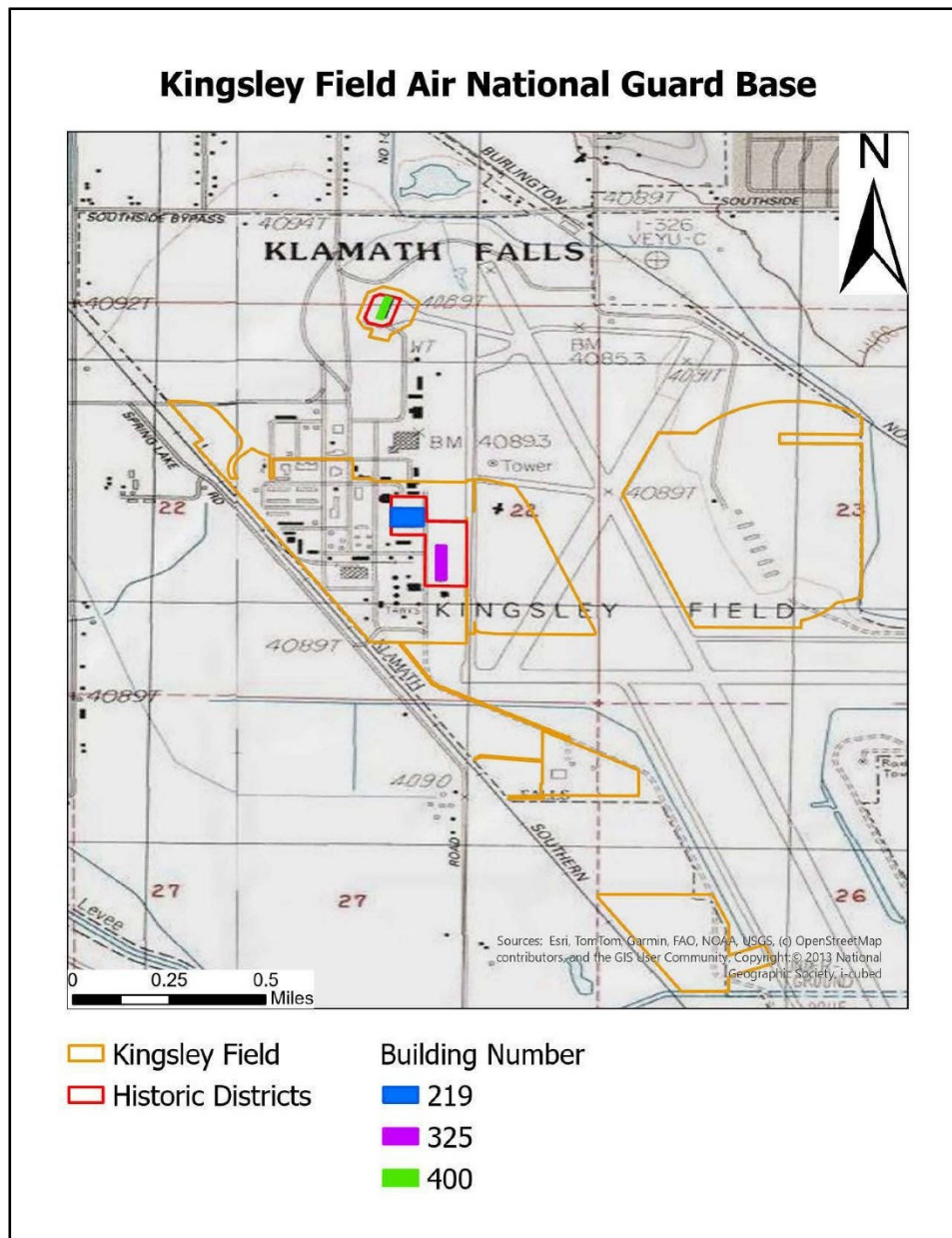


J. Rocco de Gregory RPA, GS-13, DAF  
Cultural Resources Program Manager

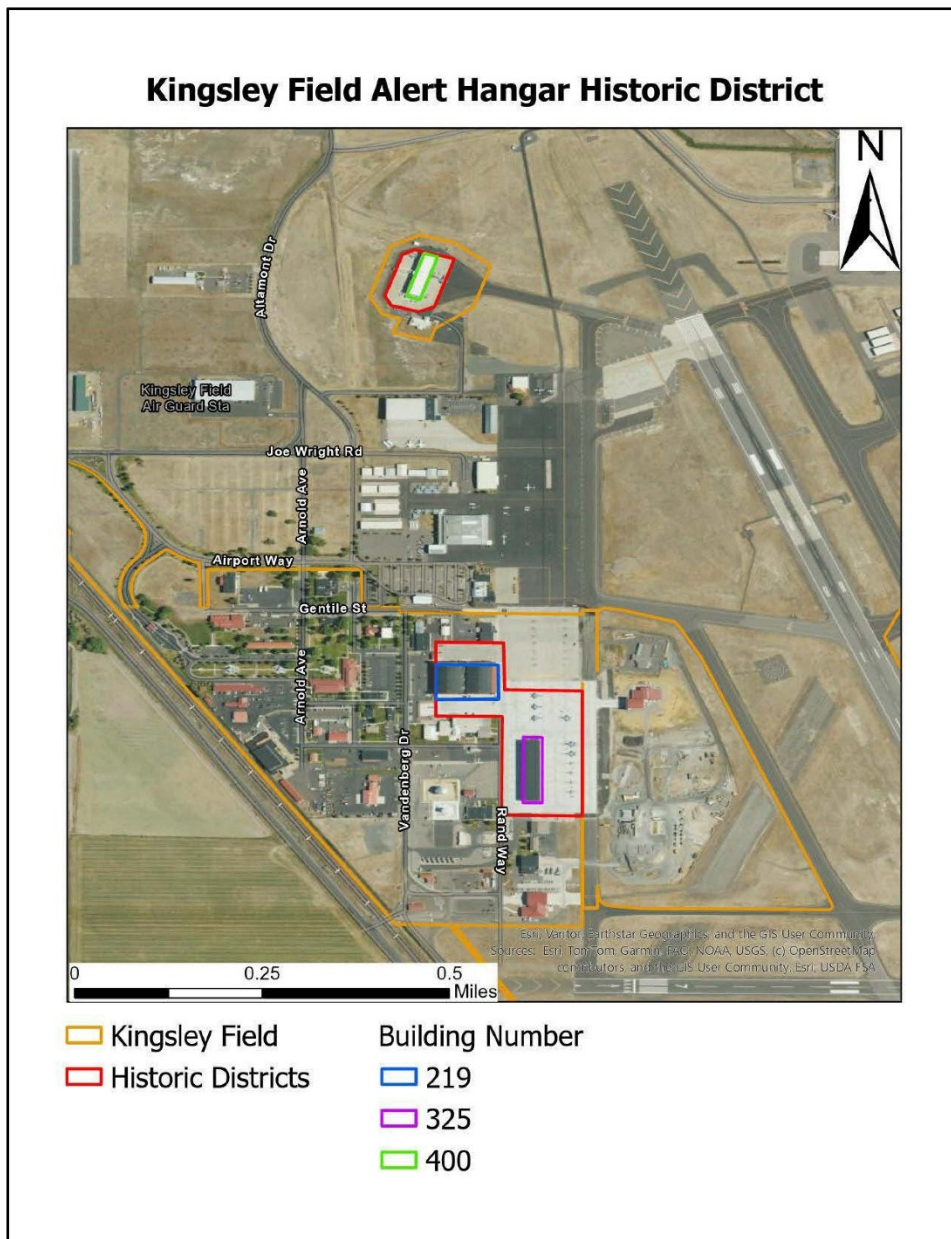
**Attachments:**

Attachment 1: Kingsley Field Alert Hangar Historic District maps

**Attachment 1**









**Oregon**

Tina Kotek, Governor

**Parks and Recreation Department**

Oregon Heritage/  
State Historic Preservation Office  
725 Summer St. NE, Suite C  
Salem, OR 97301-1266  
(503) 986-0690  
Fax (503) 986-0793  
oregonheritage.org



May 19, 2026

Rocco de Gregory  
NGB/A4VN  
3501 Fetchet Ave  
Joint Base Andrews, MD 20762

RE: SHPO Case No. 25-0706

NGB, Addition to Building 210 for New Communications Facility

The National Guard Bureau (NGB) is proposing to renovate and construct an addition to Building 210 for the 173 Fighter Wing (173 FW) at Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon

211 Arnold Ave, Klamath Falls, Klamath County

Dear Rocco de Gregory:

Thank you for submitting information for the undertaking referenced above. We concur that there will be an adverse effect to Building 219 and the Kingsley Field Historic District. We look forward to developing an appropriate approach toward mitigating the adverse effect.

Based off the submission, we do have additional questions regarding the determinations of contributing and noncontributing buildings of the historic district. The submission makes the case that several buildings do have significance associated with the period of significance and identified National Register criteria. Additionally, the discussion around those building's integrity suggests that while those buildings have been altered, their character-defining features do remain and so we do not concur on all of the noncontributing evaluations. (Facility 3359 is just one example of this). We would like to discuss further the evaluations to these buildings as this will help us understand the extent of the adverse effect. We would be happy to discuss this as we begin our conversation around a Memorandum of Agreement to resolve the adverse effect.

Additionally, we concur with the determination that Kingsley-Site-001 is not eligible for listing in the National Register of Historic Places. Our office has assigned the report SHPO biblio number 36667. Details will be available in the bibliographic database.

While mitigation can take many forms based upon the resource and the participation of consulting parties; our office has the following guiding principles:

- The resource should be fully and properly documented
- Mitigation should be relevant to the affected property
- Mitigation should be commensurate with the scale of the adverse effect
- Mitigation should provide some tangible measure of education and information for the public and be as accessible as possible

If you have not already done so, be sure to consult with all appropriate Native American tribes and interested parties regarding the proposed undertaking. Additional consultation regarding this case must be sent through Go Digital. In order to help us track the undertaking accurately, reference the SHPO case number above in all



correspondence.

Please contact our office if you have any questions, comments or need additional assistance.

Sincerely,

*Robert T. Olguin*

Robert Olguin  
Review and Compliance, Historian  
(503) 602-2468  
Robert.Olguin@opr.d.oregon.gov

cc: Mark Barron, Ngb/A7AM

***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026***

---

**From:** [DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4](#)  
**To:** [OLGUIN Robert \\* OPRD](#)  
**Cc:** [BARRON, MARK A CTR USAF ANGRC NGB/A4](#)  
**Subject:** RE: SHPO Case No.: 25-0706, NGB, Addition to Building 210 for New Communications Facility  
**Date:** Thursday, May 21, 2026 2:25:00 PM  
**Importance:** High

---

Good afternoon,

Thank you for your letter dated May 19, 2026, regarding the proposed addition to Building 210 at Kingsley Field Air National Guard Base.

We appreciate the SHPO's review and concurrence on the adverse effect to Building 219 and the Kingsley Field Historic District. We are ready to move forward with developing a Memorandum of Agreement to mitigate the adverse effects.

In your letter, you indicated that the SHPO has additional questions regarding the determinations of contributing and noncontributing buildings and that you do not concur on all of the noncontributing evaluations. To help us better understand the SHPO's position and prepare for our discussion, could you please provide us with a list of the specific buildings for which you do not concur with the noncontributing evaluations?

We look forward to resolving this matter and working with you to protect the historic resources at Kingsley Field.

V/R,  
//SIGNED//  
J. Rocco de Gregory, RPA, GS-13, DAF  
Cultural Resources Program Manager  
NGB/A4VN  
Air National Guard Readiness Center (ANGRC)  
3501 Fetchet Ave  
Joint Base Andrews, MD 20762  
Comm 240-612-8541

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

From: OLGUIN Robert \* OPRD <Robert.OLGUIN@opr.d.oregon.gov>  
Sent: Tuesday, May 19, 2026 8:17 PM  
To: DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <joseph.de\_gregory@us.af.mil>  
Cc: BARRON, MARK A CTR USAF ANGRC NGB/A4 <mark.barron.2.ctr@us.af.mil>  
Subject: [Non-DoD Source] SHPO Case No.: 25-0706, NGB, Addition to Building 210 for New Communications Facility

Please find the SHPO's response to your request for comment on cultural resources at the above-identified project. This attachment serves as your file copy. If you have any questions, please feel free to contact me.

Robert Olguin (he, him, his) | Review and Compliance, Historian State Historic Preservation Office, Oregon Parks and Recreation Department  
Cell: (503) 602-2468  
725 Summer St NE, Ste C  
Salem, Oregon 97301

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
D/EIS V2 – June 2026**

**From:** OLGA, Robert • SHPO  
**To:** DE GREGORY, JOSEPH L • CIVILIAN ANGB/IC NGB/AF  
**Cc:** BARSON, MARK A • CIVILIAN ANGB/IC NGB/AF  
**Subject:** [Non-DoD Source] RE: SHPO Case No.: 25-0706, NGB, Addition to Building 210 for New Communications Facility  
**Date:** Friday, June 12, 2026 6:14:29 PM  
**Attachments:** [image001.png]

I apologize for the delay in responding. Below are the buildings that we did not concur on regarding their contributing status based off the submitted materials.

A couple notes.

- Since the report identified a historic district, for the district's eligibility it must possess "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." (NPS Bulletin 15) Since the report indicates that the district's significance lies in the base's significance to the alert mission which was part of the Cold War national defense strategy, an eligible district must include support buildings and structures that enabled the air field to have a full time active duty fighter squadron so as to reflect the district's cohesion as defined by the NPS bulletin. Considering this, when looking at the historic properties at the airfield, several appear to fit within the historic context, have associated significance as a contributing resource, and retain sufficient integrity to reflect that significance. Additionally, because these utilitarian buildings/structures remain and can contribute to the significance it does not seem justified, per NPS guidance, to define this as a discontiguous district and their inclusion strengthens the argument for the district's eligibility. We added two columns to what is in the report (below) to illustrate the resources where we did not concur on their contributing status.
- Based off the report, we feel that the period of significance is too broad and should be narrowed to 1958-1961. This period captures the construction and rehabilitation of existing buildings/structures at the airfield for the Cold War period. While the Cold War period stretched further, by 1961 the initial and main construction phase of the redevelopment at the airfield was completed. There also is a sufficient number of buildings remaining from this time period that retain integrity to reflect this period and significance. Buildings that predate this period could contribute, if they contributed to the significance and still retained integrity. Also, the other three buildings built within the 1960s do not retain integrity and then there is a significant gap in construction until the 1980s when there is another spike in construction so it does not feel appropriate to draw the period of significance past 1961.
- Looking at the current buildings that date within the period of significance, when identifying the character-defining features and important aspects of integrity for the Criterion A district, integrity of materials and workmanship are not as important to the significance of the district. Thus, as long as alterations to the building or structure did not substantially alter the form of the historic property, we feel that there is sufficient integrity to reflect the district's significance. For instance, if the alterations were limited to window/door replacement or stucco application, and the form remains, the historic property would retain the necessary character-defining features to retain its significance.
- None of these buildings (except for what was identified in the report) are individually eligible. They all would just be contributing to a district.
- With the size of the district, even with the undertaking requiring demolition and changes to existing buildings, we do not see any additional effects based off our previous concurrence if all of these buildings noted are contributing instead of noncontributing. This said, since the hangar building is a primary resource for this district, there is a possibility that once it is gone there no longer is an eligible district and following, what may remain would just be the individually eligible resources identified in the report. This would require reevaluation following the demolition to know whether or not a district still exists.

I am happy to find some time next week to discuss any of this if that would help. Just let me know.

| Facility Number | Year Built | Original Use                    | Current Use                                   | NRHP Eligibility Recommendation | SHPO Recommendation | SHPO Comments                                                                                                                                                                                                                                                                           |
|-----------------|------------|---------------------------------|-----------------------------------------------|---------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Facility 127    | 1953       | Gymnasium                       | Gymnasium                                     | Not Eligible                    | Noncontributing     | Agree with report. Loss of integrity due to addition and change of materials.                                                                                                                                                                                                           |
| Facility 208    | 1988       | Flight Simulator                | Flight Simulator Training                     | Not Eligible                    | Contributing        | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                          |
| Facility 210    | 1956       | Communications Facility         | Communications Facility                       | Not Eligible                    | Contributing        | Historic property retains sufficient character-defining features reflective of Criteria A significance for the district. While windows/doors replaced the form remains and still reads as communications facility.                                                                      |
| Facility 213    | 1959       | Jet Engine Maintenance          | Jet Engine Maintenance                        | Not Eligible                    | Noncontributing     | Agree with report. Loss of integrity due to addition and change of materials.                                                                                                                                                                                                           |
| Facility 214    | 1959       | Runway Lighting Vault           | Utility Vault                                 | Not Eligible                    | Contributing        | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                          |
| Facility 215    | 1959       | Non-Destruction Inspection Shop | Non-Destruction Inspection Shop               | Not Eligible                    | Contributing        | Historic property retains sufficient character-defining features reflective of Criteria A significance for the district. While there is a loss of historic materials the form remains.                                                                                                  |
| Facility 219    | 1959*      | Hangar/ Maintenance Shop        | Hangar/ Maintenance Shop                      | Eligible                        | Contributing        | Agree with report.                                                                                                                                                                                                                                                                      |
| Facility 220    | 1943       | Maintenance Shop                | Maintenance Shop                              | Not Eligible                    | Noncontributing     | Agree with report. Loss of integrity.                                                                                                                                                                                                                                                   |
| Facility 229    | 1959       | Training Facility/ Theater      | Reserve Forces Operational Training           | Not Eligible                    | Contributing        | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                          |
| Facility 230    | 1959       | Survey Equipment Shop           | Survival Equipment Shop                       | Not Eligible                    | Noncontributing     | Agree with report. Loss of integrity.                                                                                                                                                                                                                                                   |
| Facility 231    | 1958       | Photo Lab                       | Audio Visual Facility                         | Not Eligible                    | Contributing        | Historic property retains sufficient character-defining features reflective of Criteria A significance for the district. While there is a loss of historic materials with stucco change over original concrete block, windows/doors replaced, the historic property still retains form. |
| Facility 234    | 1948       | Storage Warehouse               | BE Storage Facility/Disaster Preparedness     | Not Eligible                    | Contributing        | Historic property retains sufficient character-defining features reflective of Criteria A significance for the district. While there is a loss of historic materials with stucco change, windows/doors replaced, the historic property still retains form.                              |
| Facility 238    | 1960       | Storage Warehouse               | BE Storage Facility/ Disaster Preparedness    | Not Eligible                    | Contributing        | Historic property retains sufficient character-defining features reflective of Criteria A significance for the district. While there is a loss of historic materials the form remains.                                                                                                  |
| Facility 239    | 1966       | Maintenance for Motor Pool      | Reserve Forces Operational Training           | Not Eligible                    | Noncontributing     | Agree with report. Loss of integrity due to lost fenestration pattern of doors with ribbon window replacements.                                                                                                                                                                         |
| Facility 242    | 1961       | Ground Control/ Radar           | Ground Control Intercept                      | Not Eligible                    | Contributing        | Historic property retains sufficient character-defining features reflective of Criteria A significance for the district. While there is a loss of historic materials with the addition of stucco and infill of a window, the form remains.                                              |
| Facility 243    | 1987       | Squadron Operations             | Squadron Operations                           | Not Eligible                    | Noncontributing     | Agree with report. Historic property constructed outside period of significance.                                                                                                                                                                                                        |
| Facility 302    | 1943       | Base Transportation Office      | Base Exchange/ Warehouse supply and equipment | Not Eligible                    | Noncontributing     | Agree with report. Loss of integrity.                                                                                                                                                                                                                                                   |
| Facility 306    | 1959       | Fuel Pump Station               | Fuel Pump Station                             | Not Eligible                    | Contributing        | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                          |
| Facility 307    | 1957       | Avionics Shop                   | Aircraft General Purpose Shop                 | Not Eligible                    | Contributing        | Historic property retains sufficient character-defining features reflective of Criteria A significance for the district. While there is a loss of historic materials with the addition of stucco and replacement of doors/windows, the form remains.                                    |
| Facility 313    | 1958       | Utility Vault                   | Utility Vault                                 | Not Eligible                    | Contributing        | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                          |

**Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026**

|               |         |                                    |                             |              |                 |                                                                                                                                                                                                                                                                                                                           |
|---------------|---------|------------------------------------|-----------------------------|--------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Facility 325  | 1958    | Aircraft Shelter                   | Aircraft Shelter            | Eligible     | Contributing    | Agree with report.                                                                                                                                                                                                                                                                                                        |
| Facility 330  | 1958    | Fuel Pump Station                  | Fuel Pump Station           | Not Eligible | Contributing    | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                                                            |
| Facility 331  | 1961    | Avionics Shop                      | Avionics Shop               | Not Eligible | Noncontributing | Agree with report. Loss of integrity, including fenestration changes.                                                                                                                                                                                                                                                     |
| Facility 332  | 1961    | Aerospace Ground Equipment Storage | Storage Facility/Shop       | Not Eligible | Noncontributing | Agree with report. Loss of integrity.                                                                                                                                                                                                                                                                                     |
| Facility 333  | 1967    | Fuel Storage                       | Fuel Storage                | Not Eligible | Noncontributing | Agree with report. Historic property constructed outside period of significance.                                                                                                                                                                                                                                          |
| Facility 334  | 1987    | Aerospace Ground Equipment Shop    | Storage Facility/Shop       | Not Eligible | Noncontributing | Historic property constructed outside period of significance.                                                                                                                                                                                                                                                             |
| Facility 400  | ca.1966 | Aircraft Hangar                    | Aircraft Hangar             | Eligible     | Contributing    | Agree with report.                                                                                                                                                                                                                                                                                                        |
| Facility 500  | 1957    | Shop                               | Shop                        | Not Eligible | Noncontributing | Agree with report. Loss of integrity.                                                                                                                                                                                                                                                                                     |
| Facility 570  | 1959    | Radio Transmitter                  | Communications Tower        | Not Eligible | Contributing    | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                                                            |
| Facility 573  | 1963    | Maintenance Shop                   | Reserve Forces CE Training  | Not Eligible | Noncontributing | Agree with report. Loss of integrity.                                                                                                                                                                                                                                                                                     |
| Facility 575  | 1967    | Motor Pool Operators & Dispatch    | Reserve Forces CE Training  | Not Eligible | Noncontributing | Historic property constructed outside period of significance.                                                                                                                                                                                                                                                             |
| Facility 585  | 1988    | Firing Range House                 | CAT Maintenance Facility    | Not Eligible | Noncontributing | Historic property constructed outside period of significance.                                                                                                                                                                                                                                                             |
| Facility 3031 | 1958    | LF FIL STD, TRK                    | LF FIL STD, TRK             | Not Eligible | Contributing    | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                                                            |
| Facility 3150 | 1958    | Tank                               | Jet Fuel Operations         | Not Eligible | Contributing    | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                                                            |
| Facility 3153 | 1959    | Tank                               | Jet Fuel Operations         | Not Eligible | Contributing    | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                                                            |
| Facility 3335 | 1973    | Sanitary Sewer Pump Station        | Sanitary Sewer Pump Station | Not Eligible | Noncontributing | Historic property constructed outside period of significance.                                                                                                                                                                                                                                                             |
| Facility 3359 | 1958    | Sanitary Sewer Pump Station        | Sanitary Sewer Pump Station | Not Eligible | Contributing    | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                                                            |
| Facility 4002 | 1943    | Flagpole                           | Flagpole                    | Not Eligible | Remove          | Based on the report, we do not believe the flagpole is substantial in size nor significant on its own right within the historic context of the district. The flagpole seems to instead be part of the overall setting and character of the setting for the district. We recommend removing this as a called out resource. |
| Facility 4005 | 1959    | Test Cell                          | Power Check Pad (Test Cell) | Not Eligible | Contributing    | Report states historic property has integrity. Building is within period of significance and associated with historic context.                                                                                                                                                                                            |



**Robert Olguin** | Review and Compliance, Historian

Oregon Parks and Recreation Department | Heritage Section  
State Historic Preservation Office  
Cell: (503) 692-2468  
725 Summer St NE, Suite C, Salem, Oregon 97301

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Original Message

From: Dr. GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <joseph.dr\_gregory@us.af.mil>  
Sent: Thursday, May 21, 2025 11:26 AM  
To: OLGUIN Robert \* OPND <robert.olguin@opnd.oregon.gov>  
Cc: BARRON, MARK A CTR USAF ANGRC NGB/A4 <mark.barron.2.ctr@us.af.mil>  
Subject: RE: SHPO Case No.: 25-0706, NGB, Addition to Building 210 for New Communications Facility  
Importance: High

Good afternoon,

Thank you for your letter dated May 19, 2025, regarding the proposed addition to Building 210 at Kingsley Field Air National Guard Base.

We appreciate the SHPO's review and concurrence on the adverse effect to Building 219 and the Kingsley Field Historic District. We are ready to move forward with developing a Memorandum of Agreement to mitigate the adverse effects.

In your letter, you indicated that the SHPO has additional questions regarding the determinations of contributing and noncontributing buildings and that you do not concur on all of the noncontributing evaluations. To help us better understand the SHPO's position and prepare for our discussion, could you please provide us with a list of the specific buildings for which you do not concur with the noncontributing evaluations?

We look forward to resolving this matter and working with you to protect the historic resources at Kingsley Field.

V/R,  
//SIGNED//  
L. Racco de Gregory, RPA, GS-13, DAF  
Cultural Resources Program Manager  
NGIS/AAVN  
Air National Guard Readiness Center (ANGRC)  
3501 Fitchet Ave  
Joint Base Andrews, MD 20752  
Comm 240-612-8541

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

From: OLGUIN Robert \* OPND <Robert.OLGUIN@opnd.oregon.gov>  
Sent: Tuesday, May 19, 2025 8:17 PM  
To: DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <joseph.dr\_gregory@us.af.mil>  
Cc: BARRON, MARK A CTR USAF ANGRC NGB/A4 <mark.barron.2.ctr@us.af.mil>  
Subject: [Non Do] Source] SHPO Case No.: 25-0706, NGB, Addition to Building 210 for New Communications Facility

***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026***

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Please find the SHPO's response to your request for comment on cultural resources at the above identified project. This attachment serves as your file copy. If you have any questions, please feel free to contact me.

Robert Olguin (he, him, his) | Review and Compliance, Historian State Historic Preservation Office, Oregon Parks and Recreation Department  
Cell: (503) 602-2468  
725 Sumner St NE, Ste C  
Salem, Oregon 97301



**NATIONAL GUARD BUREAU  
AIR NATIONAL GUARD  
JOINT BASE ANDREWS MD 20762**

26 June 2026

J. Rocco de Gregory, RPA  
Cultural Resources Program Manager  
Air National Guard Readiness Center  
3501 Fetchet Avenue  
Joint Base Andrews MD 20762-5157

Robert Olguin  
Review and Compliance, Historian  
Oregon Parks and Recreation Department  
State Historic Preservation Office  
725 Summer St NE, Suite C, Salem, Oregon 97301

**Re: SHPO Case No. 25-0706 Kingsley Field Alert Hangar Historic District and Draft Memorandum of Agreement**

Dear Mr. Olguin,

The National Guard Bureau (NGB) is in receipt of your letter dated 19 May 2026 and your follow-up email dated 12 June 2026 regarding the Kingsley Field Air National Guard Base (ANGB) cultural resources survey. We acknowledge your agreement that implementation of the *Environmental Impact Statement (EIS) for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base, Klamath Falls, Oregon* will result in an Adverse Effect (36 CFR § 800.5) to Building 219 (maintenance hangar) and the Kingsley Field Alert Hangar District. Our office is looking forward to working with the Oregon State Historic Preservation Officer (OR SHPO) on how to best mitigate the Adverse Effect caused by the proposed demolition of the hangar. Attached to this letter is a draft copy of a Memorandum of Agreement (MOA) for the creation of a digital Story Map that will present the history of Building 219 within the historic context of Kingsley Field and the Air Defense Command's fighter interceptor and alert program. Since the general public cannot visit our ANG installations, we believe an online Story Map is an excellent platform to illustrate the significance of Building 219 while also highlighting the history and development of Kingsley Field. In recent years, the cultural resources program at the Air National Guard Readiness Center (ANGRC) has begun working with our installations and State Historic Preservation Officers (SHPO) across the country to create digital exhibits that can reach a wider public audience. An example of one of our previously completed Story Maps (currently planned for reformatting and expansion in 2027) can be found at <https://storymaps.arcgis.com/stories/4951ac4d9ad64ff794a168cc4f421ab4>. Our office welcomes the opportunity to collaborate with OR SHPO on a future Story Map for Kingsley Field ANGB.

With regards to your 19 May 2026 letter and 12 June 2026 email, NGB respectfully disagrees with your assessment that the proposed Kingsley Field Alert Hangar Historic District should be expanded to include additional Cold War Era buildings/structures as contributing resources. The following bullet points address your comments:

1. Congressional funding testimony from the Cold War illustrates that the main infrastructure components of the fighter interceptor and alert program included a three-hangar system, consisting of an alert hangar with attached or ancillary dormitory, a maintenance hangar, and a readiness hangar for fighter jets that could either be moved into the alert hangar or that could be



airborne to support the first wave fighters launched from the alert hangar. As referenced and cited in the historic district evaluation of the survey, appropriations testimony during the 1950s and early 1960s specifically referenced this three part system of construction; the alert and readiness hangars defined the program/mission of intercepting enemy targets in United States airspace, while the maintenance hangar (and attached shops as at Kingsley Field) was needed for general upkeep and routine maintenance. The buildings/structures mentioned in your email were present at all Department of the Air Force (DAF) installations during the 1950s and 1960s regardless of flying mission (e.g. communication towers, fuel tanks, storage warehouses, and water pump houses).

Our office certainly agrees that there can be a “linkage” of resources built within a specific period of significance such as the Cold War Era that can be organized into a definable historic district. Karen J Weitze’s *Cold War Infrastructure for Air Defense: The Fighter and Command Missions*, a 1999 historic context study prepared for Headquarters, Air Combat Command, for example, even identifies the following facilities as being linked “support structures” for the alert program:

“[A] readiness crew dormitory, a squadron operations buildings (often combined in a single building with the dormitory); a flight simulator; one or two readiness/maintenance hangars; clusters of two, three, or four aircraft shelters, erected in parallel rows; an electronics shop; a weapons calibration shelter; and three generations of weapons checkout, assembly, and storage structures (p. 62).”

At Kingsley Field, Building 400 (alert hangar) served as hangar, dormitory, and operations for the installation’s fighter interceptor alert program mission (different generations of alert hangars had dormitories and operations rooms either next to or attached to the hangar). The original flight simulator was demolished sometime prior to the 2002 cultural resource survey. Building 500 (built in 1957) was originally the weapons shop (located adjacent to the apron) but was completely renovated and altered in the 2000s to such degree that it is presently unrecognizable as a mid-twentieth century resource.

2. During the evaluation of Kingsley Field ANGB, our office noted that resources from the Cold War Era had the strongest potential to be considered a historic district. Field survey work indicated that Buildings 219, 325, and 400 (previously determined NRHP eligible) could all be considered individually eligible for the national register. When we looked at other Cold War resources (including Facilities 209, 210, 214, 215, 229, 231, 234, 238, 242, 306, 307, 313, 330, 570, 3031, 3150, 3153, 3359, and 4005 highlighted in your email), we found that many did not retain enough historic integrity (e.g. 215 and 231) to be considered contributing to the district. As outlined in Chapter VIII of NPS Bulletin 15, retention of historic integrity is a crucial aspect when defining a potential historic district.

“For a district to retain integrity as a whole, the majority of the components that make up the district’s historic character must possess integrity even if they are individually undistinguished. In addition, **the relationships among the district’s components must be substantially unchanged since the period of significance** (NPS Bulletin 15, p. 46).”

Many of the buildings dating from the Cold War Era have seen substantial alterations and, in some cases, additions that have negatively affected their historic integrity. While some may still have the same basic form/mass as when they were built, changes to windows, pedestrian doors, roll doors, and siding impact whether a building can contribute to the overall character of a district. Additionally, Chapter VIII of NPS Bulletin 15 provides information on determining relevant aspects of integrity when assessing historic integrity of an individual property or district:



“A basic integrity test for a property associated with an important event or person is  
**whether a historical contemporary would recognize the property as it exists today**  
(NPS Bulletin 15, p. 48).”

Upon reviewing the field work notes from the survey, we believe the answer is “no,” a historical contemporary would not recognize many of the buildings as they exist today. Many buildings constructed during the Cold War Era at Kingsley Field ANGB are unrecognizable even compared to how they existed during the 2002 cultural resources survey. Our office found that while the buildings were originally constructed in the 1950s or 1960s, when viewed as a collection they more often reflected military architecture from the early 2000s than from the mid twentieth century.

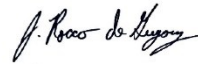
Conversely, our office recognizes that several Cold War Era resources (e.g. 306, 313, and 3150) do, indeed, retain a high degree of historic integrity, often owing to the utilitarian function and use of the facilities. Despite the minimal changes made to these resources, we did not believe that a collection of water pump houses, utility vaults, or communication towers added to the overall feel or character of our agency-determined district. In Suzanne Kieth Loechl, Susan I. Enscoe, Megan Weaver Tooker, and Samuel A. Batzli’s *Guidelines for Identifying and Evaluating Historic Military Landscapes* (DoD Legacy Resource Management Program, February 2009), the authors contend that “a contributing resource enhances the historic property...historical associations...[and] historical architectural qualities (p. 126).” As we continued to look at Buildings 219, 325, and 400 within the context of the fighter interceptor and alert program, we did not see how the inclusion of fuel tanks and electrical light vaults added to either the historical character of the three hangars or the historical narrative of Kingsley Field’s mission within the fighter interceptor alert program.

As our office considered the potential of a Cold War Era historic district, we felt that only Buildings 219, 325, and 400 with their direct association with the Air Defense Command’s fighter interceptor alert program rose to a level of significance needed for the national register.

3. Our office chose the Period of Significance (1959-1991) to reflect the start of the fighter interceptor mission at Kingsley Field and the end of the Cold War. While the installation made alterations to the hangars throughout the Cold War, for maintenance and for the introduction of new aircraft, these alterations occurred during the time of the alert program. As such, we do not believe they undermine the hangars’ ability to convey significance as Cold War Era properties or as a district. While the significance of the fighter interceptor mission declined in the late 1960s with the wide-spread introduction of Intercontinental Ballistic Missiles (ICBM), the alert program continued into the 1980s when the ANG assumed a greater role in national defense as part of the total force policy, which saw active duty and reserve components integrate their training and duties for a more cohesive national defense strategy. Extending the period of significance to the end of the Cold War also allows our office to present the military heritage of Oregon as a state guard within NGB.

In closing, our office appreciates your acknowledgement of the historical significance of the Cold War Era’s fighter interceptor alert program to Kingsley Field ANGB. The NGB is very proud of DAF and Oregon’s military history, and we feel that creating a Story Map for Building 219 and the district will be a great opportunity to share that heritage with the public. So that our office can continue to work on preparing a final MOA for execution, we ask that your office review and comment on this letter and draft agreement document within **thirty (30) days** of receipt letter to J. Rocco de Gregory, cultural resources program manager, at Air National Guard Readiness Center (ANGRC), 3501 Fetchet Ave, Joint Base Andrews, MD 20762 or by email at [joseph.de\\_gregory@us.af.mil](mailto:joseph.de_gregory@us.af.mil).

Sincerely,

A handwritten signature in black ink, appearing to read "J. Rocco de Gregory".

J. Rocco de Gregory, RPA, GS-13 DAF  
Program Manager, Cultural Resources  
NGB/A4VN

***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
DFEIS V2 – June 2026***

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**From:** [CLEARANCE ORSHPO \\* OPRD](#)  
**To:** [DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4](#)  
**Subject:** [Non-DoD Source] RE: Case No. 25-0706 Kingsley Field Alert Hangar Historic District  
**Date:** Monday, June 29, 2026 12:10:07 PM

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This email acknowledges that the Oregon State Historic Preservation Office (SHPO) received a submission on [6/29/2026] regarding SHPO Case Number [25-0706].

If SHPO does not respond within 30 calendar days from receipt of this submittal, the project may proceed as described in the submitted documentation. Other requirements under Section 106 of the National Historic Preservation Act, Oregon Revised Statute 358.653, and local permitting processes still apply.

For more information visit: <https://www.oregon.gov/oprd/OH/Pages/lawsrules.aspx>.

-  
Do not respond to this email.

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**From:** DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <joseph.de\_gregory@us.af.mil>  
**Sent:** Monday, June 29, 2026 9:05 AM  
**To:** CLEARANCE ORSHPO \* OPRD <ORSHPO.Clearance@opr.oregon.gov>  
**Cc:** BARRON, MARK A CTR USAF ANGRC NGB/A4 <mark.barron.2.ctr@us.af.mil>  
**Subject:** RE: Case No. 25-0706 Kingsley Field Alert Hangar Historic District

ANG response associated with proposed beddown of new aircraft at Kingsley Field, Klamath Falls, Klamath County.

V/R,  
//SIGNED//  
J. Rocco de Gregory, RPA, GS-13, DAF  
Cultural Resources Program Manager  
NGB/A4VN  
Air National Guard Readiness Center (ANGRC)  
3501 Fetchet Ave  
Joint Base Andrews, MD 20762  
Comm 240-612-8541

---

**From:** CLEARANCE ORSHPO \* OPRD <[ORSHPO.Clearance@opr.oregon.gov](mailto:ORSHPO.Clearance@opr.oregon.gov)>  
**Sent:** Monday, June 29, 2026 11:58 AM  
**To:** DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <joseph.de\_gregory@us.af.mil>  
**Subject:** [Non-DoD Source] RE: Case No. 25-0706 Kingsley Field Alert Hangar Historic District

**THIS SUBMISSION TO THE OREGON STATE HISTORIC PRESERVATION OFFICE IS  
BEING RETURNED AS INCOMPLETE AND UNPROCESSED.**

Electronic submissions to the SHPO must follow SHPO processes and instructions. [Click here.](#)  
**Please correct the issue(s) noted below and resubmit in full.**

**Reason for Return:**  
No Submittal Form

For assistance, please contact [Dylan.Tsolakos@oprds.oregon.gov](mailto:Dylan.Tsolakos@oprds.oregon.gov).

Do not respond to this email.

---

**From:** DE GREGORY, JOSEPH R CIV USAF ANGRC NGB/A4 <[joseph.de\\_gregory@us.af.mil](mailto:joseph.de_gregory@us.af.mil)>  
**Sent:** Monday, June 29, 2026 8:29 AM  
**To:** CLEARANCE ORSHPO \* OPRD <[orshpo.clearance@oprds.oregon.gov](mailto:orshpo.clearance@oprds.oregon.gov)>; CLEARANCE ORSHPO \*  
OPRD <[orshpo.clearance@oregon.gov](mailto:orshpo.clearance@oregon.gov)>  
**Subject:** Case No. 25-0706 Kingsley Field Alert Hangar Historic District

ANG response associated with proposed beddown of new aircraft at Kingsley Field, Klamath Falls,  
Klamath County.

V/R,  
//SIGNED//  
J. Rocco de Gregory, RPA, GS-13, DAF  
Cultural Resources Program Manager  
NGB/A4VN  
Air National Guard Readiness Center (ANGRC)  
3501 Fetchet Ave  
Joint Base Andrews, MD 20762  
Comm 240-612-8541



**Oregon**

Tina Kotek, Governor

**Parks and Recreation Department**

Oregon Heritage/  
State Historic Preservation Office  
725 Summer St. NE, Suite C  
Salem, OR 97301-1266  
(503) 986-0690  
Fax (503) 986-0793  
oregonheritage.org



August 12, 2026

Rocco de Gregory  
NGB/A4VN  
3501 Fetchet Ave  
Joint Base Andrews, MD 20762

RE: SHPO Case No. 25-0706

NGB, Addition to Building 210 for New Communications Facility

The National Guard Bureau (NGB) is proposing to renovate and construct an addition to Building 210 for the 173 Fighter Wing (173 FW) at Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon

211 Arnold Ave, Klamath Falls, Klamath County

Dear Rocco de Gregory:

As requested, please find our concurrence on the eligibility determination of facilities 219, 325, 400, and the historic district along with our concurrence on the finding of effect to the airspace.

We concur with the determination that Facilities 219, 325, and 400 are individually eligible for listing in the National Register of Historic Places.

We also concur that Facilities 219, 325, and 400 collectively form the discontinuous Kingsley Field Alert Hangar Historic District. We concur that the historic district is eligible under Criteria A and C for its association with Cold War continental air defense and as a representative example of Cold War-era military architecture.

We concur that there will be no adverse effect to historic properties within the airspace as there will be no adverse effect from the aircraft flying within the area of potential effect.

If you have not already done so, be sure to consult with all appropriate Native American tribes and interested parties regarding the proposed undertaking.

If the undertaking design or effect changes or if additional historic properties are identified, further consultation with our office will be necessary before proceeding with the proposed undertaking. Additional consultation regarding this case must be sent through Go Digital. In order to help us track the undertaking accurately, reference the SHPO case number above in all correspondence.

For future eligibility determinations of this historic property, we encourage referring to National Register Bulletins 15, 16A, and 21 as this submission used an unusual approach to defining the boundaries and contributing/noncontributing status of a historic district. There are several potential alternatives that would simplify a future submission and we would be happy to continue this conversation if requested for a future submission.

Please contact our office if you have any questions, comments or need additional assistance.

Sincerely,

*Robert T. Olguin*

Robert Olguin  
Review and Compliance, Historian  
(503) 602-2468  
Robert.Olguin@opr.d.oregon.gov

cc: Mark Barron, Ngh/A7AM



**MEMORANDUM OF AGREEMENT  
AMONG THE  
NATIONAL GUARD BUREAU,  
OREGON AIR NATIONAL GUARD,  
AND THE  
OREGON STATE HISTORIC PRESERVATION OFFICER  
REGARDING THE DEMOLITION OF BUILDING 219,  
KINGSLEY FIELD AIR NATIONAL GUARD BASE  
KLAMATH COUNTY, OREGON**

**WHEREAS**, the National Guard Bureau (NGB), as a joint activity of the Department of Defense per 10 USC §10501, provides federal funding and guidance to state Guard organizations and, as a federal agency, is required to comply with the National Historic Preservation Act (54 USC 306108) (NHPA), and the Air National Guard Readiness Center (ANGRC) is a component of NGB and provides technical assistance, oversight functions, and funding to the Oregon Air National Guard (OR ANG), and NGB and OR ANG are required to comply with NHPA for actions defined as undertakings according to the NHPA; and

**WHEREAS**, Kingsley Field Air National Guard Base (ANGB) comprises 254 acres and is the home unit of the 173<sup>rd</sup> Fighter Wing (173 FW) located in Klamath County, Oregon, on land leased by the OR ANG from the City of Klamath Falls (Figure 1); and

**WHEREAS**, NGB is preparing an *Environmental Impact Statement (EIS)* for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base, Klamath Falls, Oregon to beddown a new mission for Kingsley Field ANGB, which will see the retirement of its existing F-15 C/D fleet of aircraft and the introduction of a formal training unit (FTU) of F-35A Lightning II aircraft; and

**WHEREAS**, implementation of the proposed EIS will result in the demolition of Building 219, a dual unit maintenance hangar, constructed during World War Two with major renovations occurring in 1959, which was deemed by consensus of NGB and the Oregon State Historic Preservation Officer (OR SHPO) to be both individually eligible for listing on the National Register of Historic Places (NRHP) and a contributing property to the Kingsley Field Alert Hangar District (Figure 2); and

**WHEREAS**, NGB finds that the proposed demolition of Building 219 will cause an Adverse Effect to both the facility and to the Kingsley Field Alert Hangar Historic District and has prepared a Memorandum of Agreement (MOA) per 36 CFR § 800.6(c) in which the Advisory Council on Historic Preservation (ACHP) declined to participate; and

**WHEREAS**, the 173 FW, OR ANG, and NGB have notified the public of the proposed EIS in newspaper, in-person meetings, and a website at [www.KingsleyFieldF35EIS.com](http://www.KingsleyFieldF35EIS.com) with no comments received regarding effects to cultural resources; and



**WHEREAS**, the National Guard Bureau (NGB) and the Oregon Air National Guard (OR ANG) invited federally recognized Tribes with cultural or historical affiliations to the Kingsley Field Air National Guard Base (ANGB) area to consult on undertakings detailed in the Environmental Impact Statement (EIS), including the Confederated Tribes of the Grand Ronde Community of Oregon, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Cow Creek Band of Umpqua Tribe of Indians, and the Klamath Tribes;

**WHEREAS**, in an email dated May 8, 2024, the Klamath Tribes stated they "have no comments or concerns to share about the potential adverse effect to the Kingsley Field Alert Hangar Historic District";

**WHEREAS**, no other comments were received regarding the proposed demolition of Building 219 or any resulting ground disturbance (refer to Section V, DISCOVERIES); and

**NOW, THEREFORE**, the NGB, OR ANG, and the Oregon State Historic Preservation Office (OR SHPO), hereinafter the "Parties," agree that the demolition of Building 219 will be implemented in accordance with the following stipulations to account for the adverse effect of the Undertaking on historic properties.

## **STIPULATIONS**

### **I. STORY MAP**

A. The NGB and OR ANG shall design and initiate a digital Story Map to mitigate adverse effects resulting from the Building 219 demolition. The Story Map will include the following:

- A current map of the installation (Please note that there is a possibility that not all buildings and their current functions can be identified on a public map due to security concerns).
  - Information pertaining to the history of Building 219 as a maintenance hangar within a defense-related function and use and military area of significance.
  - Discussion of the significance of Building 219 to the Kingsley Field Alert Hangar Historic District.
  - Presentation of the development of Kingsley Field from World War Two through the Cold War with special attention given to the installation's association with the Air Defense Command's fighter interceptor and alert program.
- 1) Historical documentation of Building 219 will be intensive and will exhaust a thorough review of existing primary documents and secondary source information pertaining to the context of the Cold War and the Air Defense Command's fighter interceptor and alert program, architectural description of the hangar (including construction and subsequent alterations), and the hangar's significance to Kingsley Field ANGB. Historical information provided in the Story

Map will be properly cited using the simplified and condensed version of the *Chicago Manual of Style* found in Kate L. Turabian, *A Manual for Writers of Term Papers, Theses, and Dissertations*. The Story Map will feature a Works Cited/Bibliography page. While the historical documentation of Building 219 and its historic context will be presented in an online, digital format, the information covered will be comparable to the outline format used in HABS/HAER/HALS *Guidelines for Historical Reports* (2008, 2017).

- 2) Images used in the production of the Story Map will include historic photographs, present-day views, and aerials (dependent upon licensing agreements) to document changes to Building 219 over time and to assist in telling the story of the hangar as both an individual historic property and as a contributing resource to the historic district. Digital images taken for Building 219 (within the timespan of this MOA) will follow guidelines expressed in “Technical Requirements” of *National Register of Historic Places and National Historic Landmarks Program: Consolidated and Updated Photograph Policy, 2024*. If OR SHPO requests, 2000 x 3000 jpeg images with photolog can be submitted for their archive files.
  - 3) NGB will conduct a search for historic blueprints and plans for Building 219 that can be presented within the Story Map. The identification of blueprints and plans will aid NGB in telling the story of how and why the hangar changed over time (e.g. new aircraft, technological advancements in aeronautical engineering). If original blueprints are not located within the base or at the National Archives and Records Administration (NARA), then NGB will consult with OR SHPO on the best method of recordation of the wood truss system utilized in Building 219.
- B. The NGB and OR ANG will create the first draft of the Story Map and provide a digital copy to OR SHPO within twenty-four months of executing this MOA. The OR SHPO reviewers will have 30 days to review the Story Map and submit comments to NGB and OR ANG.
- i. The OR SHPO comments will be taken into account, and if not incorporated, NGB and OR ANG will provide the rationale for not incorporating OR ANG comments.
  - ii. If OR SHPO disagrees with NGB’s and OR ANG’s rationale, then the two parties will consult on said comments in an attempt to reach consensus.
  - iii. If no reasonable agreement is possible, NGB and OR ANG will initiate the process set forth in section VIII. DISPUTE RESOLUTION of this agreement.

- II.** The final Story Map will be linked with the 173 FW public website, the Oregon National Guard (ORNG) public website, and other websites identified in consultation with OR SHPO. Its availability will also be advertised via 173 FW and ANGRC social media platforms, as well as OR SHPO social media platforms (should the OR SHPO desire).DIGITAL SIGNATURES

Each Party agrees that a signatory may execute this document by electronic symbol or process attached to or logically associated with the document, with an intent to sign the document and by a method that must include a feature to verify the identity of the signer and the authenticity of the document, commonly referred to as verified electronic signature.

**III. SUBMISSION TO THE ACHP**

Pursuant to 36 CFR § 800.11(f), NGB and OR ANG shall submit an executed copy of this MOA and supporting documentation to the ACHP prior to approving the start of the demolition process.

**IV. DURATION**

This MOA shall be effective upon the signatures of the Parties and filing with the ACHP. It will remain in effect for five (5) years.

**V. DISCOVERIES**

If historic properties are discovered or unanticipated effects on historic properties located within a project's APE after the undertaking has been initiated, NGB will implement the following procedures:

- A. NGB and OR ANG shall immediately cease all operations for the portion of the undertaking with the potential to affect a historic property and notify OR SHPO of the finding. If Indigenous cultural material is identified during the undertaking to demolish Building 219, NGB will also cease operations at the location of the find and notify federally recognized Tribes with cultural and/or historical affiliation with the geographical location of Kingsley Field ANGB and OR SHPO to begin consultation on how to proceed.
- B. In cases of Inadvertent Discovery (NAGPRA Section 3(d) and 43 CFR § 10.4), the identification of human remains, sacred objects, items of cultural patrimony, and/or funerary objects, all operations at the site will cease and NGB will immediately notify federally recognized Tribes with cultural and/or historical affiliation with the geographical location of Kingsley Field ANGB and OR SHPO to begin consultation on how to proceed.

## **VI. MONITORING AND REPORTING**

Each year following the execution of this MOA until it expires, the work on the Story Map is completed, or the MOA is terminated, NGB and OR ANG shall provide all Parties to this MOA a summary report detailing work undertaken pursuant to its terms on the anniversary of the MOA's signing. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in NGB's and OR ANG's efforts to carry out the terms of this MOA.

## **VII. DISPUTE RESOLUTION**

Should any Party object at any time to the documentation, proposed actions, or the manner in which the terms of this MOA are implemented, the NGB and OR ANG shall consult with such party to resolve the objection. If NGB and OR ANG determine that such objection cannot be resolved, NGB and OR ANG will:

- A. Forward all documentation relevant to the dispute, including NGB and OR ANG's proposed resolution, to the ACHP. The ACHP shall provide NGB and OR ANG with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, NGB and OR ANG shall prepare a written response that takes into account any timely comments from the ACHP or signatories regarding the dispute and provide them with a copy of this written response. The NGB and OR ANG shall take into account all comments received from the ACHP and OR SHPO prior to making and executing the final decision.
- B. If the ACHP does not provide comments regarding the dispute within the thirty (30) day time period, NGB and OR ANG may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, NGB and OR ANG shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA and provide them and the ACHP and OR SHPO with a copy of such written response.
- C. It is the responsibility of NGB and OR ANG to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute.

## **VIII. AMENDMENTS**

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

## **IX. TERMINATION**

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other Parties to attempt to develop an amendment per Stipulation VIII, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, NGB and OR ANG must either (a) execute an MOA pursuant to 36 CFR 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR 800.7. The NGB and OR ANG shall notify the signatories as to the course of action it will pursue.

## **X. EXECUTION**

Execution of this MOA and implementation of its terms evidence that the NGB, as the federal agency, has taken into account the effects of the Undertaking on historic properties and afforded the ACHP an opportunity to comment.

The NGB will submit a fully executed copy to the ACHP for inclusion in their files.

## **XI. ANTI-DEFICIENCY ACT**

The NGBs obligations under this PA are subject to the availability of appropriated funds, and the stipulations of this PA are subject to the provisions of the Anti-Deficiency Act (31 USC §1341). NGB shall make reasonable and good faith efforts to secure the necessary funds to implement this PA in its entirety. If compliance with the Anti-Deficiency Act alters or impairs NGB's ability to implement the stipulations of this agreement, NGB shall consult in accordance with the amendment and termination procedures found at Stipulations VII and VIII of this agreement.

**MEMORANDUM OF AGREEMENT  
AMONG THE  
NATIONAL GUARD BUREAU,  
OREGON AIR NATIONAL GUARD  
AND THE  
OREGON STATE HISTORIC PRESERVATION OFFICER  
REGARDING THE DEMOLITION OF BUILDING 219 AT  
KINGSLEY FIELD AIR NATIONAL GUARD BASE  
KLAMATH COUNTY, OREGON**

**SIGNATORIES:**

**National Guard Bureau, NGB/A4**

STRICKLAND.WILLIAM  
M.KURT.1268856150

Digitally signed by  
STRICKLAND.WILLIAM.KURT.12688  
56150  
Date: 2026.08.31 16:11:48 -04'00'

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Will Strickland, GS-15, DAF  
Chief, Environmental Division  
Air National Guard Readiness Center A4VN

**Oregon Air National Guard**



---

Adam J. Gaudinski, Colonel, ORANG  
Commander, 173d Fighter Wing  
Kingsley Field Air National Guard Base

31 Aug 2026

Date

**Oregon State Historic Preservation Office**

Signature provided in counterpart and incorporated  
into this MOA.

---

Ian P. Johnson  
Deputy, State Historic Preservation Officer

**MEMORANDUM OF AGREEMENT  
AMONG THE  
NATIONAL GUARD BUREAU,  
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KLAMATH COUNTY, OREGON**

**SIGNATORIES:**

Oregon State Historic Preservation Office



Ian Johnson (Aug 11, 2026 15:34:20 PDT)

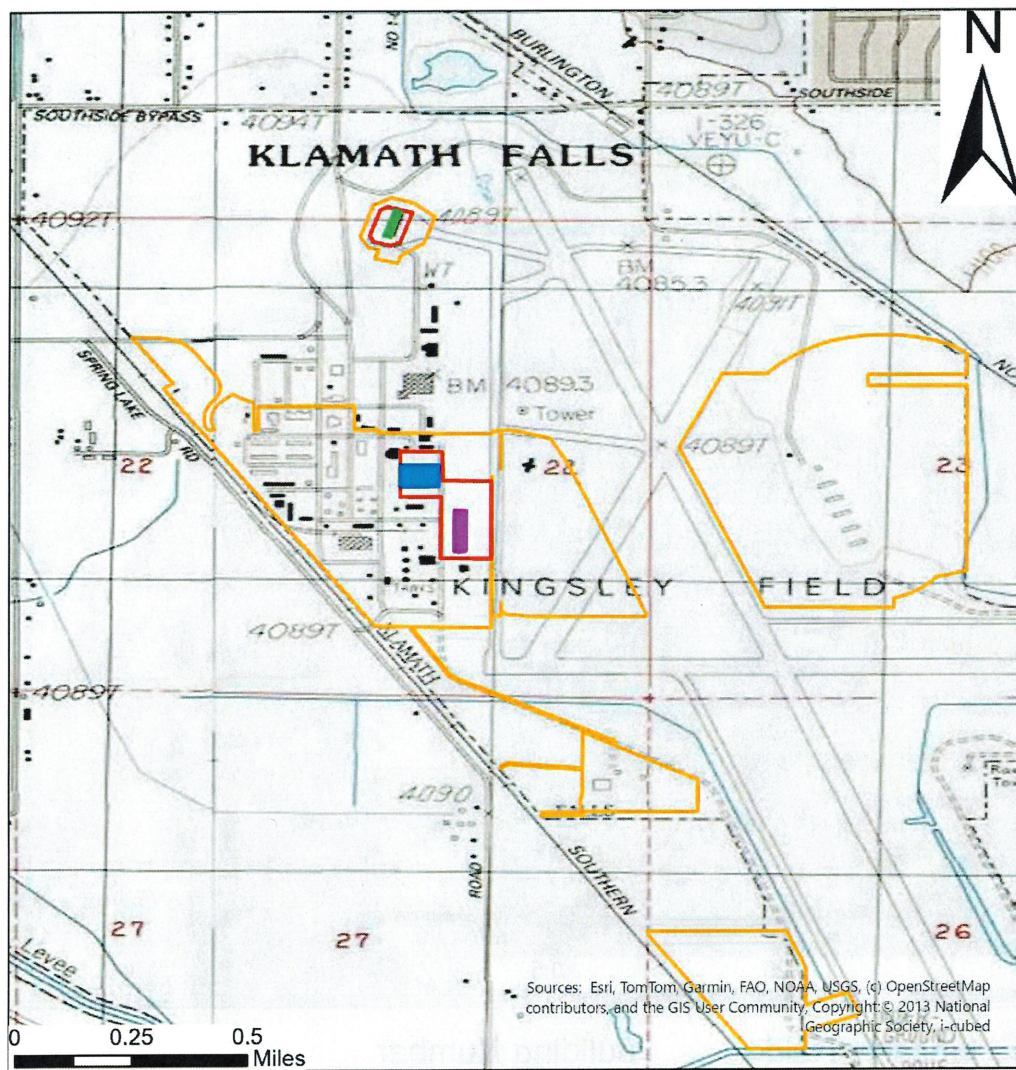
Date 08/11/26

Ian P. Johnson

Deputy State Historic Preservation Officer

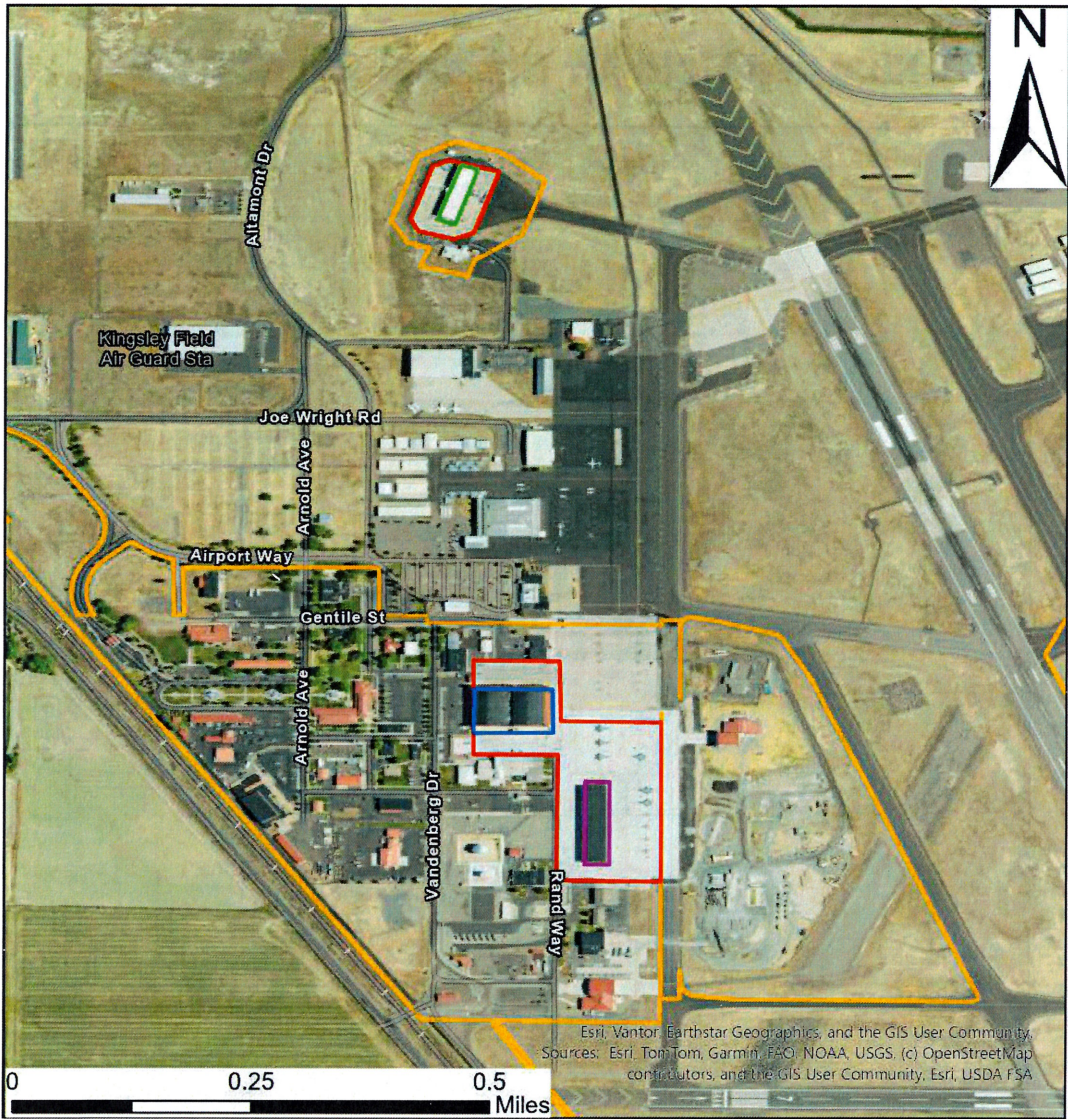


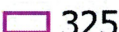
## Kingsley Field Air National Guard Base





# Kingsley Field Alert Hangar Historic District



- |                                                                                                        |                                                                                         |
|--------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
|  Kingsley Field     | <b>Building Number</b>                                                                  |
|  Historic Districts |  219 |
|                                                                                                        |  325 |
|                                                                                                        |  400 |

## **APPENDIX C    PUBLIC INVOLVEMENT**

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**APPENDIX C1**  
**PUBLIC SCOPING PERIOD**

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## **1.0 SYNOPSIS OF PUBLIC SCOPING COMMENTS**

### **1.1 OPPORTUNITIES TO COMMENT**

The DAF provided several methods for the public to comment on the Proposed Action and any other related issues. The following is a list of methods made available for commenting during the scoping process.

- By mail or email – The DAF invited interested parties to submit comments by mail or email in the Notice of Intent (NOI), agency coordination letters, fact sheet, project website, flyer, press release, newspaper display advertisements, and comment forms.
- Via the project website – The DAF included the project website URL on notifications, the comment form, and the fact sheet. The website included an online submission form and a printable comment form for download.
- Submission at public scoping meetings – The DAF provided printed comment forms at the in-person public scoping meeting, which could be completed and submitted during the meeting or mailed afterwards via mail.

### **1.2 SCOPING MEETING**

An in-person scoping meeting was held at Crater Lake-Klamath Regional Airport, 3000 Airport Way, Klamath Falls, Oregon on June 26, 2024 from 5:00 to 7:00 p.m. Sixty-two people attended the meeting, which was an open house format. Twenty people submitted written comments at the meeting. The DAF received a total of 156 public scoping comments during the official comment submittal period (June 4, 2024 to July 11, 2024).

The City of Klamath Falls, County of Klamath Falls, County of Klamath Falls-Public Health, Klamath Chamber of Commerce, and a representative from Congressman Bentz’ office were in attendance. There was overwhelming support expressed during the public meeting. Of note, all 20 comment letters received at the meeting expressed support for the project, and there were no comment letters received at the meeting that expressed opposition to the project. There were some individuals who did have questions during the meeting; those questions mostly pertained to noise, particularly for residents and businesses near the airfield.

### **1.3 SUMMARY OF PUBLIC AND AGENCY COMMENTS**

The following section provides a summary of the public and agency comments provided to the DAF during the public scoping period.

The DAF received 6 comment submissions from government agencies, listed below.

- Bureau of Land Management, Oregon/Washington State Office
- City of Klamath Falls
- Klamath County Economic Development Association

- Klamath County Planning Commission
- U.S. Environmental Protection Agency
- U.S. Department of the Interior, National Park Service

The DAF received a total of 156 comments from the public and agencies during the official public comment submittal period (June 4, 2024 to July 11, 2024) and no comments were received after this. The method of submission is shown in Table 1.

**Table 1 Summary of Scoping Comments Received**

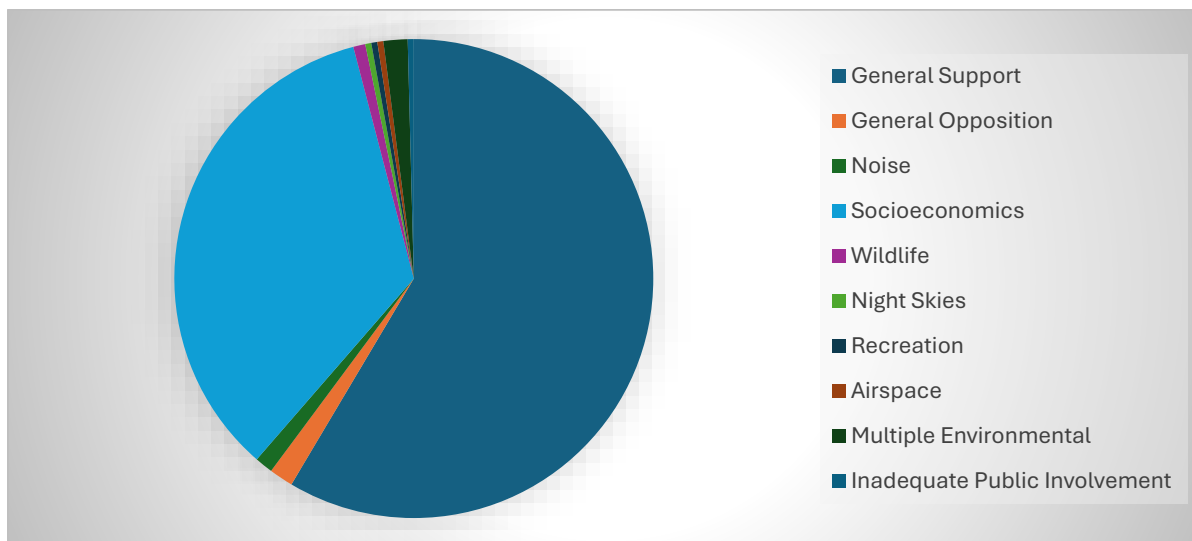
| <i>Submitted via</i> | <i>TOTAL</i> |
|----------------------|--------------|
| Website              | 127          |
| Scoping Meeting      | 20           |
| Email                | 9            |
| Mail                 | 0            |
| <b>Total</b>         | <b>156</b>   |

A summary of scoping comment topics can be found in Table 2 and comments by category can be found in Figure 1.

**Table 2 Summary of Scoping Comment Topics**

| <i>General Support</i> | <i>General Opposition</i> | <i>Noise</i> | <i>Socioeconomics</i> | <i>Wildlife</i> | <i>Night Skies</i> | <i>Recreation</i> | <i>Airspace</i> | <i>Inadequate Public Involvement</i> | <i>Multiple Environmental Concerns</i> |
|------------------------|---------------------------|--------------|-----------------------|-----------------|--------------------|-------------------|-----------------|--------------------------------------|----------------------------------------|
| 144                    | 4                         | 3            | 85                    | 2               | 1                  | 1                 | 1               | 1                                    | 4                                      |

*Note:* Many comments addressed multiple topics.



**Figure 1 Comments by Category**



#### 1.4 PUBLIC SCOPING COMMENTS

Table 3 presents written comments (scoping meeting, mail, online form) submitted to the DAF during the scoping period. The DAF has reviewed all public comments received during the scoping period to ensure that all relevant concerns have been addressed in the Draft EIS.

**Table 3 Scoping Comments**

| Entry ID                                         | First Name | Last Name | Organization/<br>Affiliation (if any) | City          | State | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Comment Category                |
|--------------------------------------------------|------------|-----------|---------------------------------------|---------------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| <i>Comments Received via the Project Website</i> |            |           |                                       |               |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                 |
| 1                                                | Randy L.   | Shaw      | R&C Shaw Family LLC                   | Klamath Falls | OR    | I am born and raised in Klamath Falls and have been a community involved person for most of my adult life. This community has always had a great relationship with the Air Force. First regular Air Force then later the Air Guard. To be a community that supports and welcomes the U.S. Air Force is something that has come natural for us. The economic impact is of course one of the items that deserves consideration. Really though it's being part of a legacy that the brings chills to my spine. The Fighting 173rd stirs patriotism in all of us hear in Klamath County. We love to say the sound of jets is the SOUND of FREEDOM. Keep us the training center, on the west coast, for F 35. Thank you for your consideration. | General Support, Socioeconomics |
| 2                                                | Tim        | Conboy    |                                       | Bend          | OR    | I support basing the F-35A Lightning II Formal Training Unit at Kingsley Field ANG installation. This action is important to maintain the Klamath County economy and the readiness of the US armed forces. I am confident that appropriate steps will be taken to avoid and minimize significant adverse environmental and other impacts. I visit the Klamath County region regularly for work and pleasure and this action will not adversely impact any of the reasons I spend time in Klamath County. In fact, I look forward to watching the F-35's as they fly through the skies of the region.                                                                                                                                       | General Support                 |
| 3                                                | Ken        | Fincher   | Oregon Tech Foundation Inc            | Klamath Falls | OR    | I strongly this endeavor. I believe there will be a minimal environmental impact in this community as the base command is very diligent and prudent when making decisions that may affect this community and region. Having been in several meetings with base command I am 100% confident in their leadership and dedication to safety.                                                                                                                                                                                                                                                                                                                                                                                                   | General Support                 |
| 4                                                | Elizabeth  | Kidd      |                                       | Keno          | OR    | As a resident of Keno in Klamath County, I welcome the proposal of a new training program for the F35 Lightening II jets at Kingsley Field. I've worked under the sound of the F15s for many years and hope to regularly hear the sound of the F35s. It is a key part of America's national defense and I support it.                                                                                                                                                                                                                                                                                                                                                                                                                      | General Support                 |

***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
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| Entry ID | First Name | Last Name | Organization/<br>Affiliation (if any) | City          | State | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Comment Category                |
|----------|------------|-----------|---------------------------------------|---------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 5        | Shannon    | Childs    |                                       | Klamath Falls | OR    | I support our military and this mission. I enjoy hearing the aircraft and always feel an appreciation of freedom when they fly. I trust that this will support the Kingsley mission and keep military families in the basin. I want our base to be supported and stay functioning to support the team, their families and the community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support                 |
| 6        | Larry      | Broadfoot | Collins                               | Wilsonville   | OR    | Collins is pleased to provide support to this ongoing important project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support                 |
| 7        | Craig      | Huntsman  | Knife River                           | Klamath Falls | OR    | I would like to say our company (Knife River) as well as myself are in full support of our troops as well as our 173rd Fighter Wing. Klamath Falls needs the base here to help drive our economy. Without the 173rd fighter wing here in Klamath Falls I believe businesses would close, and the unemployment rate would go up considerably. Eastern Oregon also supply's a great airspace to train our new pilots in. Thumbs up for the F35's. Bring them on.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | General Support, Socioeconomics |
| 8        | Eric       | Rose      |                                       | Klamath Falls | OR    | My family and I fully support the F-35's coming to Klamath Falls. The benefits to the basin's overall financial health and well-being far outweigh the negatives. If you have lived in the basin for any length of time you know the local air base is a vital part of our community! We must all stand in support of the prideful display of patriotism that we experience on the daily in our very own backyard. One would be foolish to not see that the basin would be devastated without the base and the financial benefit to the basin.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | General Support, Socioeconomics |
| 9        | Jonathan   | Moritz    | Adkins Engineering & Surveying        | Klamath Falls | OR    | <ul style="list-style-type: none"> <li>• The base provides an annual economic impact of \$129M into the region.</li> <li>• The proposed mission would add between \$250M-\$500M of capital investment into the economy through new construction projects. These projects would generate supplemental economic benefits, creating a multiplier effect on local industry which would further job creation and enable more investment in the regional economy.</li> <li>• The new mission would allow for base operations to continue for the next 30 years, ensuring the retention of 1,400 employees (nearly all paying local property taxes).</li> <li>• Kingsley Field is deeply tied to the community, especially in education. Oregon provides those who serve on the guard a free education, where as a result, the base has become an ideal training center for a wide range of professional interests (logistics, journalism, engineering, etc.), creating an opportunity that has appealed to young adults and early professionals across the state. As a result, they have become a valued stakeholder in developing a skilled workforce locally.</li> </ul> | General Support, Socioeconomics |
| 10       | Randy      | Cox       | KCEDA                                 | Klamath Falls | OR    | Please find Klamath County Economic Development Association support for the F-35 at the Kingsley Field base attached.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | General Support, Socioeconomics |

***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
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| Entry ID | First Name | Last Name | Organization/<br>Affiliation (if any)                   | City          | State | Comment                                                                                                                                                                                                                                                                                                                                                       | Comment Category                |
|----------|------------|-----------|---------------------------------------------------------|---------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 11       | Randy      | Cox       | Klamath County Economic Development Association (KCEDA) | Klamath Falls | OR    | Please see attached file for written comments.                                                                                                                                                                                                                                                                                                                | General Support, Socioeconomics |
| 12       | Bob        | Best      |                                                         | Eugene        | OR    | Good Day,<br>I wish to register my public approval for this F-35 fighter training project. In my opinion, any additional Environmental considerations can be mitigated; there are Too Many Positive aspects to this new program, to refuse it.<br>Thank you.<br>Bob Best                                                                                      | General Support                 |
| 13       | Jeff       | Woodwick  | Jeff Woodwick                                           | Klamath Falls | OR    | My address is near the north end of Kingsley Field's runway.<br>I am in full, enthusiastic support of the base mission of training the next generation of fighter pilots and defending the west coast of our nation.<br>As a patriot and an aviation enthusiast, I love watching them fly.<br>I fly the F-35, F-22, V-22 Osprey, and the "AH-94" in a VR sim. | General Support                 |
| 14       | Christine  | McKenzie  |                                                         | Klamath Falls | OR    | We support the F35 coming to Klamath Falls! Our community of military veterans and families will be a perfect fit for the unit.                                                                                                                                                                                                                               | General Support                 |
| 15       | Jeff       | Merrill   |                                                         | Klamath Falls | OR    | For the good of our town financially and for a sense of civic pride for where we live, I encourage those involved with the transition from the F15 to F35, so that we may continue to thrive as a town.                                                                                                                                                       | General Support                 |
| 16       | Alisha     | Merrill   |                                                         | Klamath Falls | OR    | I am in favor of having an F-35A Formal Training Unit at Kingsley Field Air National Guard Base. I think it would improve our national security as well as the economy of our town.                                                                                                                                                                           | General Support, Socioeconomics |
| 17       | Scott      | Souders   | n/a                                                     | Klamath Falls | OR    | My wife and I are in full support of continuing the Kinsley Field mission and we welcome the F-35 to Klamath Falls. I have lived in Klamath Falls my entire life and the base and associated aircraft have always been part of this community. The ANG and Kingsley Field are vital to our economy and the success of Klamath Falls' future.                  | General Support, Socioeconomics |
| 18       | Bevan      | York      |                                                         | Klamath Falls | OR    | I strongly support the F-35s training program in Klamath Falls because this brings jobs, strong community members, & supports national defense.<br><br>Thank you.                                                                                                                                                                                             | General Support, Socioeconomics |
| 19       | Allison    | York      |                                                         | Klamath Falls | OR    | I am strongly in support of the F-35A Training Unit at Kingsley Field Air National Guard Base. The base is an integral part of our community, providing excellent jobs, outstanding community members, as well as adding to our overall national defense.                                                                                                     | General Support, Socioeconomics |

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| Entry ID | First Name | Last Name | Organization/<br>Affiliation (if any) | City    | State | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Comment Category                                                                           |
|----------|------------|-----------|---------------------------------------|---------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| 20       | William    | Klein     | California Pines                      | Alturas | CA    | <p>July 1, 2024</p> <p>EIS Project Manager<br/>National Guard Bureau<br/>NGB/A4FR<br/>Shepperd Hall<br/>3501 Fetchet Ave.<br/>Joint Base Andrews MD 20762-5157</p> <p>We are writing to comment on Environmental Impact Statement (EIS) scoping process for Kingsley Feild EIS . After review, it is evident that there are significant deficiencies in compliance with both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA,) as well as Department of Defense (DoD) regulations.</p> <p>Lack of Specific Environmental Assessment:<br/>There appears to be no dedicated Environmental Impact Statement or related environmental work completed for the South Goose MOA/TMOA, ever. This oversight violates NEPA requirements, which mandate federal agencies to assess the environmental effects of their proposed actions before making decisions. The absence of a comprehensive EIS for this particular MOA suggests a failure to evaluate potential environmental impacts and consider alternatives adequately. Not one of your environmental analysis nor impact statements have ever considered impacts on South Goose MOA/TMOA.</p> <p>Inadequate Public Involvement:<br/>The public involvement process, a cornerstone of NEPA, has been severely lacking. Residents report a lack of public notification for military exercises and potential violations of NEPA and CEQA requirements. This lack of transparency undermines the spirit and intent of environmental protection laws and fails to meet procedural requirements for public notice and involvement. DOD also requires strict attention to NEPA but also your TMOA/MOA public notice and accountability process is broken at best.</p> <p>Safety and Environmental Concerns:<br/>Residents have reported aggressive dogfighting maneuvers and flare deployment over this populated area, particularly California Pines and Donovan Reservoir at very low altitudes. These activities, occurring without proper environmental assessment nor public notice, violate both NEPA and</p> | General Opposition, Multiple Environmental, Inadequate Public Involvement, Noise, Airspace |

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|--------------|------------|-----------|---------------------------------------|---------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| 20<br>(cont) | William    | Klein     | California Pines                      | Alturas | CA    | <p>CEQA regulations. Of particular concern is an incident on May 17, 2024, involving dangerous low-altitude maneuvers and flare deployment over our populated area.</p> <p>CEQA (California Environmental Quality Act) Compliance Issues:<br/>It is evident that the EIS process has failed to comply with CEQA, which requires public agencies to identify and disclose the potential environmental effects of their discretionary actions. The lack of any environmental study or analysis for the South Goose MOA, despite its significant impact on local communities, indicates a clear evasion of CEQA requirements. There is zero evidence that the «South Goose» MOA and or TMOA or whatever you are calling it today, was ever intentionally analyzed for environmental impact. This also constitutes a violation of DOD laws rules and regulations which requireas cooperation with local and State governments on environmental matters.</p> <p>Rushed and Biased Process:<br/>The hurried nature of this particular EIS scoping period, allowing barely 30 days including holidays, indicates a rushed process that does not allow for adequate public input or thorough environmental analysis. During this public scoping process I spoke with your public affairs and environmental people. I was met with lack of understanding (at best) over a simple and specific environmental documentation request. I received none of the material I requested and had to retrieve it online from public sources on the internet, not from you. This approach appears biased towards military operational interests, is not in good faith, disregarding the concerns and well-being of affected communities; Trying to get away with the bare minimum is typical of what we have experienced here. That is not good faith.</p> <p>Lack of Transparency and Information Access:<br/>Despite multiple requests, during the very limited time of this scoping process, relevant environmental reports and analyses have not been made available. The provided database link (<a href="https://ar.afcec-cloud.af.mil/Search">https://ar.afcec-cloud.af.mil/Search</a>) does not contain the requested information.</p> <p>Inconsistencies in Operational Information:<br/>There are discrepancies between official statements about flight operations and eyewitness accounts from community members. This raises questions about the accuracy of information being provided to the public and used in environmental assessments. Your previous EIS (2017) justified the expansion</p> |                  |

*Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
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| Entry ID     | First Name | Last Name | Organization/<br>Affiliation (if any) | City    | State | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Comment Category |
|--------------|------------|-----------|---------------------------------------|---------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| 20<br>(cont) | William    | Klein     | California Pines                      | Alturas | CA    | <p>of Juniper/ Hart<br/>(which makes South Goose look like a postage stamp) thus:</p> <p>The latest generation of technologically advanced F-15s employs weapons systems and executes tactics that require much greater vertical and lateral airspace areas than previously required. Greater vertical and lateral dimensions are required to accommodate these current and evolving weapon system changes to include greater radar and missile system standoff capabilities and the need to defend against emerging adversary capabilities.</p> <p>And</p> <p>The proposed airspace should be located and oriented such that overflights of populated, noise-sensitive, and/or environmentally sensitive areas are minimized.</p> <p>If this is so, why have your pilots been performing dogfigts over the populated area of California Pines, a less than 6,000 acre area? (Which is miniscule to even the South Goose MOA/TMOA) It appears your practice does not meet your existing environmental justifications.</p> <p>Inadequate Noise Analysis:<br/>Current environmental studies do not adequately address the impact of prolonged aircraft presence (dwell time) over populated areas, nor do they provide sufficient comparison between F-15C/D and F-35 noise levels. We experience dwell time of upto fifteen minutes or more on a regular basis (often on a weekly basis.. None of your environmental documents deal with this kind of dwell time over populated areas.</p> <p>In light of these significant issues, we strongly recommend the following actions:</p> |                  |

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| Entry ID     | First Name | Last Name | Organization/<br>Affiliation (if any) | City    | State | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Comment Category |
|--------------|------------|-----------|---------------------------------------|---------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| 20<br>(cont) | William    | Klein     | California Pines                      | Alturas | CA    | <p>Specifically address the South Goose MOA, ensuring thorough assessment of environmental impacts and compliance with both NEPA and CEQA.</p> <p>Enhance public involvement by providing ample opportunity for public comment and ensuring transparency throughout the process.</p> <p>Address safety concerns by evaluating and mitigating the risks associated with military exercises over populated areas.</p> <p>Ensure strict adherence to the procedural and substantive requirements of NEPA and CEQA to protect the environment and public health.</p> <p>Provide full disclosure of all relevant environmental reports and analyses.</p> <p>Conduct a thorough noise impact study that includes analysis of aircraft dwell time and accurate comparisons between different aircraft types.</p> <p>Establish clear protocols for timely public notification before conducting high-risk military exercises in or near civilian areas. Currently, we receive zero notification and your Base, according to the FAA, does not publish NOTAMs in South Goose either. Currently there is zero public notice nor accountability.</p> <p>Finally, we need a lot more information on the alternatives you intend to study. Your scoping document does not deal with any other alternatives other than the proposed «replacement» and the «no action» alternative. What about the transition period? What about the newer F-15EX? Do you really know what the fleet mix and size will be? You must deal with transitioning and the possibility of many more sorties than existent.</p> <p>You don't know nor control what will happen in this regard. Right now, Congress doesn't know either. We demand that realistic alternatives be studied not just the theoretical, especially as it concerns California Pines, Modoc County, and South Goose MOA/TMOA.</p> |                  |



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| Entry ID     | First Name | Last Name | Organization/<br>Affiliation (if any) | City          | State | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Comment Category                |
|--------------|------------|-----------|---------------------------------------|---------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 20<br>(cont) | William    | Klein     | California Pines                      | Alturas       | CA    | <p>We urge you to address these deficiencies promptly to bring the process into compliance with federal and state environmental regulations, ensuring better environmental stewardship and community relations. The community stands ready to engage constructively in this process to ensure that military training needs are balanced with environmental protection and public safety.</p> <p>Sincerely,</p> <p>Dr. William F Klein, AICP<br/>801 Lake View Drive<br/>California Pines<br/>Alturas, CA 96101</p> <p>Carla L Klein, MA<br/>801 Lake View Drive<br/>California Pines<br/>Alturas, CA 96101</p>      |                                 |
| 21           | Lori       | Stiehr    | Woodsy Kitchen                        | Klamath Falls | OR    | We are 100% behind the Air National Guard and the F35. We support all military functions and airmen in our community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | General Support                 |
| 22           | Vincent    | Hilgeman  |                                       | Klamath Falls | OR    | I support the plan to bring in the F35 to our community. I hope the mission grows in the future and we in Klamath Falls can be part of this growth.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | General Support                 |
| 23           | Charles    | Massie    | Klamath Community College             | Klamath Falls | OR    | None                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N/A                             |
| 24           | Janet      | Buckalew  |                                       | Klamath Falls | OR    | I am in support of the F-35 mission at Kingsley which will help our local economy, provide airspace to practice safely, and keep with the history of our community of having an airbase. I live here when my father was stationed at Kingsley. We need the support F-35 & F-15 Pilots and crew 100%                                                                                                                                                                                                                                                                                                                 | General Support, Socioeconomics |
| 25           | Kathy      | Pattersin |                                       | Klamath Falls | OR    | I support Kingsley field air base and the and the F-35A training unit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | General Support                 |
| 26           | Charles    | Bland     | Veteran                               | Klamath Falls | OR    | 173d presence within the Klamath Basin is an invaluable contribution that ensure longevity and relevance for all who call the Basin home. The transition to the F-35 ensures the continued tradition and heritage of the Air Defense community that has existed in the Klamath Basin for over 70 years and is as much a part of the environmental culture and nd cherished way of life as Agriculture, Education, small business, corporate industry, Healthcare and services. One would no more remove the school districts or SkyLakes than they would Kingsley Field and its Local, State, and Federal missions. | General Support                 |
| 27           | Jeffery    | Southern  |                                       | Klamath Falls | OR    | It will be awesome to have the F-35 program come to Kingsley Field. It will help with job opportunities, keep Kingsley Field open, and keep supporting the state for Oregon and the US Air Force with training pilots.                                                                                                                                                                                                                                                                                                                                                                                              | General Support                 |
| 28           | Tim        | Hamblin   |                                       | Klamath Falls | OR    | This town needs Kingsley to remain a training facility in the future. Let's not let a EIS be another nail in the coffin for Klamath county.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | General Support                 |

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|----------|------------|-----------|---------------------------------------|---------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 29       | Martin     | Sherin    |                                       | Klamath Falls | OR    | The importance of this facility in preparing our military to be the best they can be and the importance of the economic presence will make the transfer from the 15s to the 35s a new chapter in the distinguished history of Kingsley.                                                                                                                                                                                                                                                                                                                                                                                       | General Support                 |
| 30       | Paul       | Baker     | 550FS                                 | Medford       | OR    | I would like to see the F-35 FTU come to Kingsley Field. The mission is essentially important to the National Defense Strategy of the United States and would be great to have that impact and visibility in our local community.                                                                                                                                                                                                                                                                                                                                                                                             | General Support                 |
| 31       | Jared      | Andrade   |                                       | Klamath Falls | OR    | I do not think that the F-35 is the right choice for the Land of No Slack                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | General Opposition              |
| 32       | Karen      | Johnson   |                                       | Salier        | CA    | I am in Klamath Falls quite often to visit family and am always glad to see the aircraft from Kingsley flying; makes me feel a sense of great security for not only our side of the United States but for the whole United States. I grew up next to Hill Air Force Base in Ogden, Utah and watched the jets every day flying overhead, feeling that same sense of security. Our Air Bases are very important to the security of our country and the fact that Kingsley houses the F15s and soon the F35s is such a wonderful thing in my estimation. I am 80 years old and want to see our country remain militarily strong. | General Support                 |
| 33       | Dane       | Sherin    |                                       | Klamath Falls | OR    | Klamath county depends on Kingsley Field and their training mission financially. The amount of money that the base members spend in the local community is significant and it would be catastrophic if the mission was gone. The community, in whole is very supportive of the base and enjoys the base personnel because they are true members of this community. The fact that Kingsley has amazing airspace and overwhelming support from the community, I'd like to see the mission grow and opportunities for multiple units to be stood up at Kingsley in the future.                                                   | General Support, Socioeconomics |
| 34       | David      | Smith     |                                       |               |       | Kingsley Field is a vital part of the economy and culture of Klamath Falls. Aside from the nearly 1000 full time jobs, many Kingsley families are actively involved in schools and community activities. With no planned alternative to the F-35 conversion, Klamath would lose those families that make up 1/10th of the community. The economic effects would be disastrous, as 20% of the city already lives below the poverty line, some 20,000 people. The F-35 and its associated infrastructure would retain stable, well paying jobs to an area that depends on them.                                                 | General Support, Socioeconomics |
| 35       | Rodney     | Clark     | Military                              | Klamath Falls | OR    | Gaining the F-35 to our basin is a huge addition to the economy and life of Klamath falls. We already struggle to gain employers, commerce and life to the area. Please allow the opportunity for the basin, the base and our community to thrive and grow.                                                                                                                                                                                                                                                                                                                                                                   | General Support, Socioeconomics |

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| 36       | Derek      | Larman    |                                       | Klamath Falls | OR    | Bringing the F-35 to Kingsley is essential for our community. The Air Base brings jobs and resources that make great contributions to our city. Having the F-35 established at Kingsley will bring longevity to not only the base but to our town as a whole.                                                                                                                                      | General Support, Socioeconomics |
| 37       | David      | Beanland  |                                       | Klamath Falls | OR    | I'm in full support of the F35's coming to Klamath. The influx of revenue and growth will be a huge benefit for the Klamath basin. The air base is the number one employer in town and if we don't bring in these planes and its crew our community will not grow and in turn begin to die. With the F15 leaving or being decommissioned the base will no longer be used and destroy this economy. | General Support, Socioeconomics |
| 38       | Joe        | Young     | Klamath County Planning Commission    | Klamath Falls | OR    | why aren't you studying for 2 squadrons worth of aircraft? I heard that someday the base will grow. wouldn't doing a little extra work now, save alot of time later down the road?                                                                                                                                                                                                                 | General Support                 |
| 39       | Linda      | Mott      |                                       | Klamath Falls | OR    | I've lived here many years. First the F16's were here, then transitioned over to the F15's. The military must keep upgrading and for us to be a training base for pilots.of the F35's is a wonderful opportunity.                                                                                                                                                                                  | General Support                 |
| 40       | Harrison   | Walker    |                                       |               |       | I think the formation of an F-35 FTU in Klamath falls would be a wonderful addition to the rich history of Kingsley field. while continuing the availability of jobs in the local area. it will further the relevance of Klamath falls and Kingsley field in the future                                                                                                                            | General Support, Socioeconomics |
| 41       | Kelley     | Minty     | Klamath county                        | Klamath falls | OR    | Enthusiastically support this new mission! This is a huge development for Klamath County                                                                                                                                                                                                                                                                                                           | General Support, Socioeconomics |
| 42       | Darren     | Bennett   | 173d FW                               | Klamath Falls | OR    | The Basin needs the F35 Formal Training Unit! Kingsley Field will not survive without this mission, and without Kingsley Field, Klamath Falls will not survive. Kinglsey Field offers so much opportunity to the citizens of Klamath Falls, to include high paying jobs, pride, purpose, and a future for our children. We all need this mission!                                                  | General Support, Socioeconomics |
| 43       | Nathan     | Atwood    |                                       | Klamath Falls | OR    | I support the F-35 formal training unit coming to Kingsley Field. The base is a great support to the community and the community I feel loves to support the base as much as they can.                                                                                                                                                                                                             | General Support                 |

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|----------|------------|-----------|---------------------------------------|---------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 44       | Collin     | Grandy    |                                       | Klamath Falls | OR    | <p>Bringing the F-35 student training mission to Kingsley Field in Klamath Falls promises significant benefits to both the base and the local community. Here are several compelling arguments in support of this initiative:</p> <p><b>Job Creation and Economic Boost:</b> The arrival of the F-35 mission will create numerous job opportunities directly and indirectly related to the base. Military personnel, civilian contractors, and support staff will all be needed to accommodate and maintain the new aircraft and infrastructure. This influx of jobs will not only benefit current residents but also attract new residents seeking employment opportunities, thereby stimulating the local economy.</p> <p><b>Increased Revenue and Business Opportunities:</b> With more personnel stationed at Kingsley Field, local businesses, including restaurants, shops, and service providers, will experience increased patronage. This uptick in consumer spending can lead to the expansion of existing businesses and the emergence of new ones, further diversifying the local economy.</p> <p><b>Infrastructure Development:</b> The need to support the F-35 mission will likely spur infrastructure development projects in Klamath Falls. This could include upgrades to roads, utilities, and housing to accommodate the growing population associated with the base. Such improvements not only benefit the military but also enhance the overall quality of life for residents.</p> <p><b>Educational Opportunities:</b> Kingsley Field's partnership with the F-35 program could create educational opportunities for local students interested in aviation, technology, and related fields. Collaborative programs with nearby educational institutions could provide specialized training and potentially lead to internships or job placements at the base, fostering a skilled workforce pipeline.</p> <p><b>Community Support and Pride:</b> Military bases often foster a strong sense of community pride and support. The presence of the F-35 mission at Kingsley Field could strengthen community ties through events, outreach programs, and volunteer opportunities. Additionally, military families often become involved in local activities and organizations, enriching the community fabric.</p> | General Support, Socioeconomics |

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|--------------|------------|-----------|---------------------------------------|---------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 44<br>(cont) | Collin     | Grandy    |                                       | Klamath Falls | OR    | In conclusion, the F-35 student training mission at Kingsley Field offers a multitude of benefits for Klamath Falls, ranging from economic growth and job creation to enhanced community engagement and national defense contributions. Supporting this initiative not only secures the base's future but also positions the local community for sustained prosperity and development. National Defense Contribution: By hosting the F-35 training mission, Kingsley Field plays a crucial role in national defense. This mission enhances the base's strategic importance and reinforces its long-term viability, ensuring continued federal investment in its operations and infrastructure. |                                 |
| 45           | MICHAEL    | MCKOEN    |                                       | MERRILL       | OR    | I fully support Kingsley Field ANB transitioning to a F-35A Formal Training Unit. This is incredibly important to our national security and our local economy. It is ridiculous that we taxpayers are funding an EIS for this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | General Support, Socioeconomics |
| 46           | Mackenzie  | Phelps    |                                       | Klamath Falls | OR    | The F-35s will be a huge asset to the Basin. Kingsley Field recently updated its lease with the City of Klamath Falls for the next 75 Years. Having the F-35s here will cover at least half that amount and continue stability in the local economy for the foreseeable future.                                                                                                                                                                                                                                                                                                                                                                                                                | General Support, Socioeconomics |
| 47           | JOHN       | DEY       | KLAMATH AIRSHOWS DIRECTOR             | NATIONAL CITY | CA    | I CANNOT IMAGINE AN AIRBASE AND COMMUNITY BETTER SUITED FOR THIS MISSION. WE HAVE AVAILABLE AIR AND GROUND SPACE. WE HAVE BEEN THE SCHOOLHOUSE FOR THE AIR-TO-AIR VERSION OF THE F-15 FOR MANY YEARS. VISITING AIRMEN HAVE ALWAYS LEFT SUPER IMPRESSED BY THE QUALITY OF PEOPLE AND FACILITIES HERE. PLEASE LET ME KNOW HOW I CAN FURTHER ASSIST IN MAKING THIS HAPPEN!<br>JOHN DEY                                                                                                                                                                                                                                                                                                            | General Support                 |
| 48           | Courtney   | Shaw      | Coldwell Banker Holman Premier Realty | Klamath Falls | OR    | As a lifetime resident of Klamath Falls, I am in full support of the F-35A Formal Training Unit at Kingsley Field Air National Guard Base EIS . I have been in Real Estate for almost 12 years and have always considered the sound of jets "the sound of freedom". I love to hear them in our skies and filling our community. I think feel that this is a very important piece to the successful growth and development of Klamath Falls. Without these advancements in training and the 173rd Fighter Wing in our community so much revenue and contributions to the community are lost. I am in full support of this training.                                                             | General Support, Socioeconomics |
| 49           | Nathaniel  | Tolbert   |                                       | Klamath Falls | OR    | I'm excited for the grow and opportunities this new air craft will offer for klamath falls, as well as the longevity in which it will keep our base open running and employing our community for years to come.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | General Support, Socioeconomics |
| 50           | Dena       | Hadwick   |                                       | Klamath Falls | OR    | This is good for jobs in our community. We love our base and everything about it. Thank you all for all you do.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | General Support, Socioeconomics |

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|----------|------------|-----------|---------------------------------------|---------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 51       | Hali       | Lingren   |                                       |               |       | I believe that Kingsley Field acquiring the F-35A Lightning II would be a great opportunity for not only the base but also the community. Bringing in new features, jobs, technology and other helpful economic growth opportunities to Klamath Falls is something that all could benefit from.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | General Support, Socioeconomics |
| 52       | Corey      | Lingren   |                                       | Klamath Falls | OR    | The arrival of the F35 fighter jet to kingsley field seems to be a fantastic opportunity for not only Kingsley Field but also Klamath Falls. The personnel and money that will be put back into the community through purchases is vital for the survival and expansion of Klamath Falls!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | General Support, Socioeconomics |
| 53       | Joel       | Scott     |                                       |               |       | The 173FW, Oregon Air National Guard, and US Air Force provide a significant impact to Klamath Falls and the Surrounding area. The wing offers well-paying jobs with career opportunities. Long term employees buy homes, pay property taxes, enroll children in schools. They support local businesses, volunteer with charitable organizations, and coach youth sports. A continued mission for the 173d is vital for the health of this community and the F-35 FTU is that mission.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | General Support, Socioeconomics |
| 54       | Adam       | Gaudinski | Concerned citizen / Local resident    |               |       | With nearly \$500 million of investment into the base, the local community will surely benefit. The F-35A is a welcomed asset into this community!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | General Support, Socioeconomics |
| 55       | Adam       | Gaudinski | Concerned citizen / Local resident    |               |       | <p>The F-35 coming to Klamath County, Klamath Falls, and Kingsley Field is a great thing. As a local resident, I am extremely supportive of this endeavor. This new aircraft does a ton to support the following:</p> <ul style="list-style-type: none"> <li>-America's combat projection and power</li> <li>-Jobs</li> <li>-Economic impact</li> <li>-Housing development</li> <li>-Support local communities and business owners</li> <li>-Oregon does not have any Active Duty military units. This F-35 supports the Active Duty pilot training shortfalls while members are able to support the State mission.</li> <li>-A lack of flying mission at Kingsley would be detrimental to the community. Kingsley is either the #1 or #2 employer depending on how the census is obtained.</li> <li>-Kingsley Field does so much to support the local community. Parades, flybys, memorial dedications, school events, coaches, church congregations, etc.</li> <li>-Kingsley Field is a great steward in the community. They execute noise abatement procedures, comply with flying restrictions, use chaff/flare only in certain season to avoid wildfire danger, etc.</li> </ul> <p>Please bring the F-35 to our community!</p> | General Support, Socioeconomics |

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| 56       | Nicki      | Strain    | Klamath Falls                                              | Klamath Falls | OR    | I am writing in support of the F-35 Formal Training Unit coming to Kingsley Field here in Klamath Falls. Kingsley Field is a vital part of our community and employs a large number of our citizens. This training is imperative to the defense of our Country as well.                                                                                                                                                                                                                                                                                                                 | General Support, Socioeconomics |
| 57       | Kalen      | Larson    |                                                            | klamath falls | OR    | I am excited to see the F35 flying around Klamath Fall. Kingsley Field is a great part of the basin. It supports so many families and local business. If we loose Kingsley Field I think it would be a huge loss to the community and local businesses and could drastically affect the housing market.                                                                                                                                                                                                                                                                                 | General Support, Socioeconomics |
| 58       | carol      | mick      | Mick Insurance Agency, Inc.                                | Klamath Falls | OR    | I would like to voice my support of the Kingsley Field F35 Training program.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | General Support                 |
| 59       | Nikki      | Elbert    |                                                            | Bonanza       | OR    | I am in full support of Kingsley Field and the F=35 project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | General Support                 |
| 60       | Anna       | Fowler    |                                                            |               |       | Kingsley Field plays a HUGE role in Klamath County's economic infrastructure. The base offers many civilian jobs for our community. Base personnel bring families to the area and are consumers of local goods and services. Kingsley Field is also a great resource and industry partner to Oregon Tech, Oregon's polytechnic university located in Klamath Falls. Any improvements and advancement to Kingsley Field is by default and improvement and advancement to the communities of Klamath County. The positive economic impacts vastly outweigh any other impacts on our area. | General Support, Socioeconomics |
| 61       | Christie   | Murphy    |                                                            | Klamath Falls | OR    | I am beyond thrilled that Kingsley Field is being considered for the F-35 air frame. Please bring those fantastic jets to Klamath Falls! Thank you so much!                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support                 |
| 62       | Chad       | Elbert    | Self Employed at Rudius Quest Coaching / Elbert Consulting | BONANZ A      | OR    | Kingsley field is a valuable part of the Klamath Basin. I fully support the new mission for the F35.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | General Support                 |
| 63       | Aaron      | Spahn     | ORANG                                                      | Klamath Falls | OR    | With the addition of a F-35 training unit added to Kingsley Field it will add the opportunity for growth in the community by creating more jobs and stimulate the local economy with more disposable income. It will also create more events that will include not only military members but the entire community. It is a great opportunity for growth in the Klamath Basin in a positive direction.                                                                                                                                                                                   | General Support, Socioeconomics |
| 64       | Ryan       | Manfull   |                                                            | Klamath Falls | OR    | Securing the F-35 at Kingsley Field is a huge win for the community. The base provides much needed economic stability to the area, and is a huge supporter to the local area in terms of volunteerism and contributions to community organizations. Without the security for the future the new aircraft provides, we would be at risk of losing this valuable contributor to the area. I am in full support of the induction of the F-35.                                                                                                                                              | General Support, Socioeconomics |



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| 65       | Nathaniel  | Morehouse |                                       | Klamath Falls | OR    | This new F-35 mission will be good for our community. Kingsley Field has been a prominent part of this area for many decades now and the economic benefit of having this organization here is truly immense. This new mission will ensure that benefit continues and grows for the next several decades.                                                                                                 | General Support, Socioeconomics |
| 66       | Kyle       | Hood      |                                       | Klamath Falls | OR    | Bringing the F-35's to Kingsley Field is going to be a great upgrade to the Klamath Basin. I'm excited to see the personnel influx that happens which will continue to sales of real estate. Aside from the base, Walmart and the railroad, there doesn't seem to be much major employment companies for the area so, keeping the base up and running will sustain the Klamath basin's influx of money.  | General Support, Socioeconomics |
| 67       | Cassandra  | Patterson |                                       | Klamath Falls | OR    | The potential for the new Aircraft means the sustainability of the guard base for years to come. Giving future generations opportunity and supporting the Klamath Basin with job security and providing freedom!                                                                                                                                                                                         | General Support, Socioeconomics |
| 68       | Jen        | Schuster  | Business owner                        | Klamath Falls | OR    | Integrating the F-35A at Kingsley Field will bring significant economic benefits to our community. The transition from the retiring F-15 to the F-35A will secure current jobs and create new opportunities, supporting local businesses and families. Our community's established experience with the F-15 makes us uniquely qualified to handle the F-35A, ensuring a smooth and efficient transition. | General Support, Socioeconomics |
| 69       | Danielle   | Anderson  | Teacher                               | Klamath Falls | OR    | Any military training that benefits our future as Americans is 100% welcome here in my opinion. I love to hear the jets fly... IT'S THE SOUND OF FREEDOM!!! THANK YOU TO ALL THAT HAVE SERVED. I'M TRULY GRATEFUL!!!                                                                                                                                                                                     | General Support                 |
| 70       | Kay        | Rutledge  |                                       |               |       | They remind me of the sound of freedom. I welcome them and proudly support them being here in our community!                                                                                                                                                                                                                                                                                             | General Support                 |
| 71       | Cheryl     | Olguin    |                                       |               |       | I love the idea that the mission will extend Kingsley's presence in our community for another 20 to 30 years. As the second largest employer in the community, it would be a crushing blow to our area to lose it. I'm very proud that we have Kingsley here.                                                                                                                                            | General Support, Socioeconomics |
| 72       | Jason      | Morrow    |                                       | Klamath Falls | OR    | I approve the F-35 coming to Klamath Falls. Welcome more jobs to Klamath and a boost to the economy!! I appreciate the military and Klamath would be a great training facility.                                                                                                                                                                                                                          | General Support, Socioeconomics |
| 73       | Pamela     | Redding   | DPRedding Inc.                        | Klamath Falls | OR    | I would like to see the program come to Klamath Falls. It would be a good thing for our city and our businesses.                                                                                                                                                                                                                                                                                         | General Support, Socioeconomics |
| 74       | Caroline   | Riblett   |                                       |               |       | Having lived in Klamath Falls all of my life (except for college,) I am thankful and excited to see the mission of Kingsley Field continue--training pilots for combat-ready jets.                                                                                                                                                                                                                       | General Support                 |
| 75       | Daniel     | Minchk    |                                       |               |       | I fully support the F-35's mission in Klamath Falls. I believe Kingsley field and the service member that work there are a back bone to the commerce and community of Klamath Falls.                                                                                                                                                                                                                     | General Support                 |

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| 76       | Randy L.   | Shaw        | Klamath Basin Behavioral Health       | Klamath Falls | OR    | <p>I am born and raised in Klamath County and have been a fan of the Air Force (Guard) since the early 70's. The base has a positive affect on the economic well being of this community and is a tremendous partner in helping support other community events.</p> <p>I am also proud of our heritage concerning Kingsley Field and when I hear the jets performing it is music to my ears. I like to say it is the sound of freedom.</p> <p>We have, for years been a strident supporter of Kingsley and what the people working and serving there bring to our community. Please continue this tremendous relationship with our community and the people that live here.</p> | General Support, Socioeconomics |
| 77       | Kellie     | Myrick      | LBS Express Cleaning, LLC             | Klamath Falls | OR    | I love our air base and I am so excited for the bringing in of the F35's. We love you all and support Kingsley Field 100% on this mission!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | General Support                 |
| 78       | jesse      | conner      |                                       | klamath falls | OR    | Kingsley field is imperative for the wellbeing of Klamath Falls. They pump millions of dollars into the economy and provide upstanding community members. The F-35 would guarantee the continued and increasing prosperity of Klamath Falls.                                                                                                                                                                                                                                                                                                                                                                                                                                    | General Support, Socioeconomics |
| 79       | Darrell    | Burkhart    | Oregon Army National Guard            |               |       | As it pertains to the construction of the infrastructure required for operation of the F-35, will local (Klamath County) Contractors be used? Or will the powers that be go non-local like every time they have "enhanced" Kingsley Field in previous attempts ?                                                                                                                                                                                                                                                                                                                                                                                                                | Socioeconomics                  |
| 80       | Lori       | Worthington |                                       | Klamath Falls | OR    | Kingsley Field is a gem for our community! Without it, Klamath would be nothing. To say that we are proud to tell others that it is here as a training facility is an understatement. We are blessed that we have this facility - the jet roars are truly the sound of freedom!                                                                                                                                                                                                                                                                                                                                                                                                 | General Support                 |
| 81       | Dack       | Brophy      | 173rd FW                              | Klamath Falls | OR    | I look forward to seeing F-35's at Kingsley Field. It will be an awesome new addition to the community. It will secure our future and our kid's future if they decide to follow in our footsteps.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | General Support                 |
| 82       | Malea      | Hunt        |                                       |               |       | Please focus on housing and infrastructural improvements to make the F35 program a successful one. Existing population continues to struggle with good housing, how will it work with program influx? There is also a severe lack of clothing oriented business. Our community needs to grow well and quickly to support this program and make it a successful one.                                                                                                                                                                                                                                                                                                             | Socioeconomics                  |

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|----------|------------|-----------|---------------------------------------|---------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 83       | George     | Ormsbee   |                                       | Klamath falls | OR    | As a past President of the board for Klamath County Chamber of Commerce, I feel very strongly that adding the F35 mission to Kingsley Field would be a huge benefit to the Klamath Falls business community. That will bring more support staff to our existing staff and help keep jobs and financial support in this community. The base and the support it gives the community has always been at the highest levels and is necessary for continued growth in our Klamath Community. I believe there are more supporters of a contined relationship that benifits our businesses and serves as a mutual positive experience moving forward.<br>Thank you for this consideration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | General Support, Socioeconomics |
| 84       | Brandon    | Fowler    |                                       | Chiloquin     | OR    | <p>Dear Kingsley Field Leadership,</p> <p>I am writing to express my strong support for the F-35 aircraft training mission at Kingsley Field in Klamath Falls. As a Klamath County resident, I understand the importance of Kingsley Field to our region and its significant role in national defense.</p> <p>The F-35 aircraft training mission not only enhances the readiness of our armed forces but also contributes to the local economy and community. Kingsley Field has a long-standing history of excellence in training pilots and providing crucial support to our national defense strategy. The introduction of the F-35 further solidifies Kingsley Field's position as a cornerstone of military readiness and capability.</p> <p>I believe that supporting the F-35 mission at Kingsley Field is vital for several reasons:</p> <ol style="list-style-type: none"> <li>1. National Security: The F-35 is a state-of-the-art aircraft that plays a critical role in maintaining air superiority and ensuring the safety of our nation and its allies.</li> <li>2. Economic Impact: Kingsley Field provides significant economic benefits to the Klamath Falls area, supporting jobs and stimulating local businesses.</li> <li>3. Community Partnership: The presence of Kingsley Field fosters a strong bond between the military and the local community, promoting collaboration and mutual support.</li> <li>4. Training Excellence: The expertise and training facilities at Kingsley Field are unparalleled, making it an ideal location for F-35 pilot training.</li> </ol> | General Support, Socioeconomics |

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|--------------|------------|-----------|---------------------------------------|---------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 84<br>(cont) | Brandon    | Fowler    |                                       | Chiloquin     | OR    | <p>I am confident that the F-35 mission will not only uphold but enhance Kingsley Field's reputation as a center of excellence in military aviation training. The continued investment in Kingsley Field's infrastructure and capabilities will ensure its readiness to meet future challenges and opportunities.</p> <p>Please know that you have my full support in advocating for the F-35 aircraft training mission at Kingsley Field. I urge decision-makers to recognize the benefits and strategic importance of this mission for our national defense and local community.</p> <p>Thank you for your dedication to serving our country and for your commitment to Kingsley Field's mission. I look forward to seeing the continued success and growth of Kingsley Field as a premier training facility for our armed forces.</p> <p>Sincerely,</p> <p>Brandon Fowler</p> | General Support, Socioeconomics |
| 85           | Blane      | Rings     | Desert Lake Technologies              | Klamath Falls | OR    | <p>Can't wait to hear the "sound of freedom" fly over Southern Oregon.</p> <p>Just a quick PS, My brother Capt Dr. Matt Rings USN, helped design the optic display on the helmet of the F-35.</p> <p>Blane</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | General Support                 |
| 86           | Nathaniel  | Dean      | Chamber of Commerce                   | klamath falls | OR    | <p>I'd like to express my support the F35 mission at Kingsley Field. The future of our nation needs to be in the right hands. Kingsley Field has kept the aging F15 fleet not just operational, but ready to defend our nation. There is no better place to put the trust of our national defense. Our crews are experienced, capable, and ready. Bring the F35 to Kingsely Field and ensure the defense of our flag, our freedom, and our nation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                           | General Support                 |
| 87           | Cynthia    | Smith     | None                                  | Klamath Falls | OR    | <p>I support the growth the F-35A would bring our community.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | General Support, Socioeconomics |
| 88           | Kendra     | Santiago  | SmithBates Marcomm Solutions          | Klamath Falls | OR    | <p>We are excited to see a continued presence of the military in Klamath County.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support                 |

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|----------|------------|-----------|---------------------------------------|---------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 89       | Zachary    | Vaughan   |                                       | Klamath Falls | OR    | The presence of F-35's in our town not only strengthens national security but also brings significant economic growth and strategic benefits to our community. Their state-of-the-art technology and unmatched capabilities ensure that we remain at the forefront of defense, deterring any potential threats. Additionally, the operations and maintenance of these aircraft will create jobs, boost local businesses, and attract further investment in our town, fostering growth and stability.                                                                                                                                                                   | General Support, Socioeconomics |
| 90       | Andrew     | Nichols   |                                       | Klamath Falls | OR    | Grow Kingsley, Klamath County welcome a more robust military footprint.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | General Support                 |
| 91       | James      | Dreyer    | 173MXG/<br>ORANG                      | Klamath Falls | OR    | I feel that a F-35A FTU for the Klamath Falls community would be an outstanding way to provide employment and career opportunities to so many residence and their families! Just seeing how Kingsley Field supports Klamath Falls now, with the opportunities available for a new airframe (F-35A), the sky is the limit. Also, with all the new regulations and stringent requirements that come with new FTU missions and with one of the most advanced Air Force Fighter Aircraft, the Klamath community will be well protected environmentally which is best for the residence of this community!                                                                  | General Support, Socioeconomics |
| 92       | Jeffrey    | Jones     |                                       | Klamath Falls | OR    | Having the F-35 at Kingsley is a huge benefit for the community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | General Support, Socioeconomics |
| 93       | Ashlyn     | Hartman   |                                       | Klamath Falls | OR    | Kingsley Field has been the home for our F-15's. The basin needs the base to help with jobs in Klamath Falls. Now that the 15's are aging out, we need a replacement aircraft to keep the base and jobs going. The airspace is perfect for the F35's. The community loves the base and the sound of freedom flying overhead every day.                                                                                                                                                                                                                                                                                                                                 | General Support, Socioeconomics |
| 94       | Peggy      | Roberts   |                                       | Klamath falls | OR    | Would like to be informed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N/A                             |
| 95       | James      | Mossett   |                                       | Klamath Falls | OR    | Bringing the F-35 and a Formal Training Unit to Kingsley Field will have a positive impact for the OR ANG and Klamath Falls community. With the addition of new aircraft and a future mission, Kingsley Field could see an increase in Military and civilian personnel who would help rejuvenate the economy by supporting Local Restaurants and Businesses and building projects. I'm talking about career jobs. Not just minimum wage, fast food and vape shops. Our local economy would see a significant increase in business opportunities from the constructions project alone. An F-35 FTU would help keep Kingsley Field open, providing jobs for generations. | General Support, Socioeconomics |

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|--------------|------------|-----------|---------------------------------------|---------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 95<br>(cont) | James      | Mossett   |                                       | Klamath Falls | OR    | Without a new airframe and mission, Kingsley Field could be closed under the BRAC program, which could jeopardize the entire Basin. Just Imagine 400+ families trying to sell their home and move out of the Basin. The housing market would tank at the slightest whispers of Kingsley Field closing. Restaurants and local businesses would struggle next, followed by every other industry that is supported by the 400+ Airmen that work on that base.<br>Kingsley Field needs Klamath Falls, just as much as Klamath Falls needs Kingsley Field.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support, Socioeconomics |
| 96           | Kevin      | Harter    |                                       | Klamath Falls | OR    | <p>The Kingsley F35 mission is crucial to the economy for several reasons. Firstly, it stimulates economic activity through investment in research, development, and production of advanced aerospace technologies. This creates high-skilled jobs, boosts local economies near production facilities, and enhances national technological competitiveness globally. Additionally, military contracts like the F35 sustain a vast network of suppliers, ranging from small businesses to large corporations, thereby supporting a diverse economic ecosystem.</p> <p>Furthermore, the F35 program involves substantial exports, generating revenue from international sales and fostering positive trade balances. These funds circulate back into the economy, contributing to growth and stability. Moreover, defense contracts often lead to innovations with civilian applications, benefiting sectors such as telecommunications, materials science, and manufacturing.</p> <p>The Kingsley F35 mission is crucial to the economy for several reasons. Firstly, it stimulates economic activity through investment in research, development, and production of advanced aerospace technologies. This creates high-skilled jobs, boosts local economies near production facilities, and enhances national technological competitiveness globally. Additionally, military contracts like the F35 sustain a vast network of suppliers, ranging from small businesses to large corporations, thereby supporting a diverse economic ecosystem.</p> <p>Furthermore, the F35 program involves substantial exports, generating revenue from international sales and fostering positive trade balances. These funds circulate back into the economy, contributing to growth and stability. Moreover, defense contracts often lead to innovations with civilian applications, benefiting sectors such as telecommunications, materials science, and manufacturing.</p> | General Support, Socioeconomics |

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|--------------|------------|-----------|---------------------------------------|---------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 96<br>(cont) | Kevin      | Harter    |                                       | Klamath Falls | OR    | <p>Regarding environmental impact, stringent regulations and advancements in aerospace technology ensure that modern military aircraft like the F35 are designed with sustainability in mind. These include measures to minimize emissions, noise pollution, and resource consumption during both manufacturing and operational phases. Additionally, aerospace companies increasingly invest in eco-friendly practices and technologies, such as lightweight materials and fuel-efficient engines, further reducing environmental footprint.</p> <p>Moreover, the defense industry's commitment to environmental stewardship extends to remediation efforts and sustainability initiatives in local communities affected by defense operations. Comprehensive environmental assessments and adherence to international standards ensure that the production and operation of military aircraft like the F35 have minimal adverse effects on surrounding ecosystems.</p> <p>In conclusion, the Kingsley F35 mission is vital to the economy due to its significant contributions to technological advancement, job creation, export earnings, and industrial innovation. Simultaneously, rigorous environmental standards and advancements in aerospace technology mitigate potential negative impacts on the environment, ensuring sustainable development alongside economic benefits.</p> | General Support, Socioeconomics |
| 97           | Joshua     | Neely     |                                       | Klamath Falls | OR    | <p>Kingsley field is responsible for a majority of new money introduced to Klamath Falls each month. A vast majority of other employers do not bring fresh outside funds into the local economy, they simply recirculate existing funds. A local economy only on existing funds will not flourish, it will slowly collapse. With the retirement of the F-15, Klamath Falls needs a new Air National Guard mission to keep the town alive. What better opportunity than the F-35. A mission that wouldn't only come with neutral income, but will actually bring in more contract workers, and larger backing from the Air Force with available funds. Both of these things will provide more money and security to the local economy for not only our children, but their children's future. This is not only a nicety for the community, but also a necessity to keep the town alive. Without a mission, Klamath Falls will collapse. In the 24 years I have lived in this town, I've never experienced an area with so much support of a military unit. There are only a few people who do not support it, most of those people do not hold jobs in this town, and are not invested into it's future. They are surviving off of government</p>                                                                                                                                             | General Support, Socioeconomics |



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|--------------|------------|-----------|---------------------------------------|---------------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 97<br>(cont) | Joshua     | Neely     |                                       | Klamath Falls | OR    | subsidies and could care less about actual economic survival. Those few are anti military, anti government, anti anything that is above and beyond the bare minimum. Fortunately, those few opinions do not represent the masses, they are so far and few between that I would venture to say they don't make up 5%.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | General Support, Socioeconomics |
| 98           | Deanna     | FRANKS    |                                       | Klamath Falls | OR    | In full support. The base is well run, with solid leadership, and the new program is welcome in Klamath Falls.<br><br>Thank you for your service.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | General Support                 |
| 99           | Jeremy     | Riblett   |                                       | Klamath falls | OR    | I can't wait to have the F-35 at Kingsley Field!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | General Support                 |
| 100          | Darin      | Masoner   |                                       | Klamath Falls | OR    | The F-35 is a great asset to have in Klamath Falls. Not only will it help with our national defense but, it will also have a positive econmic impact on our community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support, Socioeconomics |
| 101          | Michael    | Angeli    | Klamath Falls Downtown Association    | Klamath Falls | OR    | I am a proud citizen, business owner and community supporter. The missions of the ANG 173rd at Kingsley Field are not only incredibly important for the nation, but us as a community as well.<br><br>We love, support and promote all that is Kingsley Field. The essential relationships created and maintained by the Wing and its families are the lifeblood of our community and its prosperity.<br><br>The sound of freedom ( the roar of each and every model flown ) in and out of our airport just solidifies and reminds us of the things that we take for granted each day. Our hard won victories and tremendous losses that have paved our way for freedom and prosperity.<br><br>We, as a patriotic community of 40,000 plus, support the missions of Kingsley Field and look forward to the F-35 and any future components to our region wholeheartedly!<br><br>Respectfully,<br><br>Michael Angeli | General Support                 |
| 102          | Casey      | Rietdyk   |                                       | Klamath Falls | OR    | The city of Klamath Falls would continue to prosper with the F-35 being stationed here. It will support the community and solidify future growth.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | General Support                 |
| 103          | Eric       | Harris    |                                       | Klamath Falls | OR    | F-35's will be a great and lasting investment into Klamath county. Long term income and money coming back into the community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | General Support, Socioeconomics |

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| 104      | Brian      | Horne     |                                       |               |       | I strongly advocate for establishing the F-35A formal training unit at Kingsley Field Air National Guard base. This initiative presents a significant opportunity for the future of Klamath Falls and promises enduring benefits for generations of Klamath families. The personnel stationed at the base are integral members of our community, contributing not only as service members but also as active participants in local life. They raise their families here, with some being native to Klamath Falls, actively supporting local businesses, owning homes, and engaging in community activities such as coaching local sports teams and helping out at local churches. Many long-serving members of Kingsley Field have deep ties to the region, with their children completing their education from kindergarten through college locally, while their spouses contribute to the civilian workforce. The base's symbiotic relationship with the community is evident in the overwhelming support it receives from locals, who are staunch advocates of our military presence. | General Support, Socioeconomics |
| 105      | Holly      | Loomis    | USAF Veteran Spouse                   | Klamath Falls | OR    | The addition of the F35 squadron(s) provides economic support & stability for our community and supports the overall mission for Kingsley Field and the USAF. It is a no brainer to say YES. I pray the citizens of Klamath Falls and surrounding communities step up mightily to show our support. It's a Yes from me for so many reasons.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | General Support                 |
| 106      | Jody       | Carter    | Windermere Real Estate                | Klamath Falls | OR    | I fully support the F-35A Lightning II Formal Training Unit at Kingsley Field ANG installation in Klamath Falls, Oregon. I strongly feel it will only do great things and be only positive for our community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | General Support                 |
| 107      | Tara       | Bryson    |                                       | Klamath Falls | OR    | BRING ON THE F35s!!! This is an awesome opportunity for our community! Not only would I be proud to have the training site in my town, but I believe this would provide economic growth to Klamath Falls also due to the families that could be living here as a result. I am 100% in agreement with this!!!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support, Socioeconomics |
| 108      | Mike       | Christie  |                                       | Klamath Falls | OR    | The F-35 coming to Klamath Falls will have a great and positive impact for the community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | General Support                 |
| 109      | Shawna     | Damrow    |                                       | Klamath Falls | OR    | I would like to continue to see Kingsley field train pilots in order to protect our freedom and country.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | General Support                 |
| 110      | Howard     | Davis     |                                       |               |       | As a 11 year Klamath Falls resident, I feel like the Kingsley mission is vital to this community and to the training of these excellent pilots in their mission to protect our way of life!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | General Support                 |

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| 111      | Ben        | Ebner     |                                       | Klamath Falls | OR    | As a resident of Klamath Falls, I fully support Kingsley Field's continued operation as a training base, both in its current capacity (with F-15 aircraft) and in the future as an F-35A training base. It's hard to imagine the environmental impact of F-35 training will be much different than that of the current F-15 training. Regardless, whether it is or not, I fully support Kingsley Field becoming an F-35A training base.                                                                                                                                                                                                                                                                                                                                                                                               | General Support                 |
| 112      | Greg       | Davis     |                                       | Klamath Falls | OR    | <p>The Klamath Falls community and the state of Oregon both benefit greatly from the Kingsley Field mission. Kingsley Field not only provides jobs, tax revenue, community sustainability, partnerships and opportunities for our local families, it also affords us the ability to support our country's national security at the local and state level.</p> <p>Kingsley Field military members often have deep rooted connections within our community which gives them the opportunity to foster trust, understanding and collaboration with many of our local businesses and community leaders. As our military advances its technology and moves into the future it's critical we have communities like Klamath Falls throughout our country that support our military efforts and desire to build a strong economic future.</p> | General Support, Socioeconomics |
| 113      | Alex       | Huntsman  | 173FW OSS                             | Klamath falls | OR    | <p>The F35 would be great for the future of Klamath falls. Our jets are old and need to be replaced with the 5th gen fighter! It would give younger kids the option to join the ANG to serve our country and work with one of the most advanced fighters in the world. Kingsley brings active duty people to the community which brings money to all the small businesses.</p> <p>Great idea! Let's get these jets here and start training the worlds best fighter pilots</p>                                                                                                                                                                                                                                                                                                                                                         | General Support                 |
| 114      | Grace      | Barrett   | Family of active duty AF              | Klamath Falls | OR    | Another great addition to our community!!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support                 |
| 115      | Arthur     | Petersen  |                                       | Klamath Falls | OR    | Having the F-35 in Klamath Falls will be a great thing for the community. Any negative environmental impacts will be far exceeded by the positive impacts. There is a huge economic impact that will bring millions of dollars to this area. The talent and Leadership of people at the base and association with the F-35 is a tremendous asset to this community. I live where I can see the runway and rejoice every time I see the Jets jump into the air. I love the sound. I love the security that comes from these airplanes.                                                                                                                                                                                                                                                                                                 | General Support, Socioeconomics |

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| 116      | Matthew    | Amuchastegui | Lincoln Homes Incorporated            | Klamath Falls | OR    | I believe having the F35 training unit here at Kingsley will be beneficial to our community. I think it will bring more good families to our community, which will in turn help our local businesses. Aside from the economic benefit, as a patriot myself, I believe it will add to the excitement we get to experience already by watching this awesome aircraft fly over head in our skies above. Everything I see a jet fly it reminds me of our great country, our freedom, and what we stand for. Proud to support this and proud to be an American!             | General Support, Socioeconomics |
| 117      | BRAD       | Mortenson    |                                       |               |       | Having been born and raised in Klamath Falls, I have always and will always enjoy the sights, sounds, and pride of having our United States Air Force training and practicing in our airspace.<br>This training center brings tremendous benefit for the members of our community. It increases opportunities for skill and knowledge development, it provides stable economic benefits, it engenders local and national confidence.                                                                                                                                   | General Support, Socioeconomics |
| 118      | Geoff      | Jensen       |                                       |               |       | I am please to hear of the F-35s coming to Kingsley Field. This new aircraft will provide long term stability to the community and greatly benefit the region.                                                                                                                                                                                                                                                                                                                                                                                                         | General Support                 |
| 119      | James      | Dean         | retired AF                            | Klamath Falls | OR    | I think this community needs Kingsley Field and the F-35 training mission here! For those that wish it to go away, they have no idea how much revenue Kingsley brings to the Basin. Shame on those for thinking of only themselves!!!!!!                                                                                                                                                                                                                                                                                                                               | General Support                 |
| 120      | Gregory    | Davis Sr     | Senior Citizen Retired                | Klamath Falls | OR    | We need to support our local training air national guard base.<br>Every day I hear the true sounds of freedom fly over my house and recognize how our country and community are truly working to keep us free, strong and safe from our enemies in the world we live!!!!!!!!!!                                                                                                                                                                                                                                                                                         | General Support                 |
| 121      | Alexis     | Rainville    |                                       | Klamath Falls | OR    | As I am from a military family I believe that the new F-35's will be good for the community. It will bring more people which in return will bring in more jobs. I think that the F-35's will help the community grow in a good way.                                                                                                                                                                                                                                                                                                                                    | General Support, Socioeconomics |
| 122      | Jamie      | Rainville    |                                       |               |       | Our community relies on Kingsley field to provide jobs and support families. Bringing a new aircraft will only support the growth of our community and keep families here.                                                                                                                                                                                                                                                                                                                                                                                             | General Support, Socioeconomics |
| 123      | Ryan       | Rainville    |                                       | Klamath Falls | OR    | This community is a military community, and without the base Klamath Falls would collapse. There is no other major industry that could sustain this city. We are extremely excited and fortunate to have Kingsley Field and also the the men and women of the Air Force here. Having the F-35 is extremely exciting, and we are looking forward to having it stationed here. Showcasing what we can do as a community with the help of the F-35 being here is a great way forward for Klamath Falls and the Air Force. Hopefully the F-35 gets here sooner then later. | General Support, Socioeconomics |

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|-------------------------------------------|------------|-----------|---------------------------------------|---------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 124                                       | Richard    | Schuster  |                                       | Klamath Falls | OR    | We are very excited about the new F-35s being stationed in Klamath Falls. The buzz around town is palpable and you can't ask for a more supporting community. What a great continuing tradition for our small town! We are REALLY looking forward to the new change!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | General Support                 |
| 125                                       | Emily      | McIntire  | State Representative                  | Eagle Point   | OR    | Greetings! I am in full support of the beddown, operation, and associated infrastructure construction of one FTU squadron of F-35A aircraft at the 173 FW. The Kingsley Field Airforce Base is neck and neck to be the largest employer in the Klamath Basin. They not only take care of their own, but they are embedded in the community as coaches, board members, and volunteers. On my visits to Kingsley Field I am always amazed at the organization, the attention to detail and the pride they have in their service to our country. I know that this mission will be handed in the same way. For many of us in this state, to have a flyover on Memorial Day and the 4th of July is the highlight of the day- the beauty of Kingsley Field in Klamath Falls is this community gets to see our Armed Forces at work each day. I look forward to seeing this project move forward and am confident it will be executed in the most efficient, considerate, clear, successful way possible. The people operating Kingsley Field don't do lazy. They do plans and they follow through. Thank you for your time and consideration. Blessings. | General Support, Socioeconomics |
| 126                                       | Tyler      | Cox       |                                       |               |       | I strongly support the F-35 coming to the Klamath Basin, it bolsters our local economy and greatly enhances the safety and security of our community, state, and nation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | General Support, Socioeconomics |
| 127                                       | Adam       | Stacey    |                                       | Klamath Falls | OR    | Klamath Falls is on the brink of an economic boom. We are growing! Bringing the F-35 FTU mission to Klamath Falls would continue our upward trajectory and make our spot on the map even more valuable. Not only that, Kingsley Field brings in MILLIONS of dollars to the community every year. Securing the F-35 FTU mission would continue the longstanding bond between Klamath Falls and its military families. This will impact generations for the better - securing their prosperity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | General Support, Socioeconomics |
| <b><i>Comments Received via Email</i></b> |            |           |                                       |               |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                 |
| 128                                       | Adam       | Stacey    | 173 MXG/MXMC P                        | Klamath Falls | OR    | To whom it may concern – The F-35 FTU mission in Klamath Falls will be extremely beneficial to the community. Let's make it happen! This will positively impact the basin for generations!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | General Support, Socioeconomics |

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| 129      | Hazleton       | April     |                                       |               |       | I live in this area, and I do not want low level flyovers interrupting my recreational activities. I enjoy the calm nature of my area. If I wanted to here jets and such flying overhead, I would move closer to the city. My horses will not appreciate this either. She freaks and runs through fences when there are any loud unnatural noises. It will also disturb the wildlife in this area. This area is also a tourist attraction due to its natural beauty. If you do this it will ruin it.<br>Sincerely,<br>April Hazelton                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Opposition,<br>Noise,<br>Wildlife     |
| 130      | Jessica        | Ashley    |                                       | Klamath Falls | OR    | Sir or Ma'am,<br>Klamath County Emergency Department have received your letter and invitation to attend the meeting on June 26. Please add three to your list of attendees.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | N/A                                           |
| 131      | Miki and David | Barnes    |                                       | Banks         | OR    | Topic: <b>Statement in Opposition to F-35 Training at Kingsley Field</b><br>Kingsley Field, where the military is proposing F-35 training is 4 miles from Klamath Falls (population 21,000) and an hour away from Crater Lake National Park, the only national park in Oregon. In addition, Kingsley Field is located close to the Fremont-Winema and Umpqua national forests. All are areas that need to be treasured and preserved for current and future generations as well as the residents, wildlife, flora and fauna that live there. The impact of F-35 training over this area would contribute to a significant increase in noise levels, environmental pollution, ecological degradation and global warming. For these reasons and those elucidated by Code Pink (discussed below), we urge you to forgo efforts to engage in F-35 flight training at this location or any other location in Oregon. According to a petition brought forward by Code Pink, over 220 global organizations are calling for a complete cancellation of the F-35 program for a number of reasons including “the harm caused abroad, cost of the program to the taxpayer, inefficiencies and failures, the environmental impact of F-35s, and the effects training has on local communities.” Click on the link below for details. <a href="https://www.codepink.org/groundthef35">https://www.codepink.org/groundthef35</a> Below are excerpts from the Code Pink petition. <b>HARM CAUSED THROUGH MILITARISM</b> The F-35 is a weapon of war. Although not ready for full-scale production, the U.S. intends on producing countless F-35s to sell around the world that will without a doubt be used to harm people living in the Global South. F-35s have the capacity to carry nuclear weapons, and the deployment of these jets only aids nuclear proliferation. The U.S. already makes up 40% of the global arms trade, aiding and abetting war crimes all over the world. Israel is | General Opposition,<br>Multiple Environmental |

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| 131<br>(cont) | Miki and David | Barnes    |                                       | Banks | OR    | <p>procuring F-35's from the United States which have already been used to launch airstrikes on Gaza to further Israel's goals of ethnic cleansing and displacement in Palestine. Saudi Arabia has expressed interest in F-35s as well as the UAE while both countries wage a brutal war on Yemen. The F-35 is a disaster of a project, but also a potential disaster for humanity.</p> <p><b>INEFFICIENCIES AND FAILURES</b> The F-35 spending is becoming impossible for important members of Congress to justify. The Chair of the House Armed Services Committee, Rep. Adam Smith called the F-35 a "rathole." Another member of HASC, Rep. John Garamendi had some scathing comments about the F-35 in a HASC subcommittee hearing in May: "For the contractors out there, what are you doing? Why can't you give us a piece of equipment that actually works? You should never have a contract. And for Lockheed, you want a five-year maintenance contract? You can't do what you're doing today. Come on. What are we thinking? If I have not adequately expressed my frustration, I would assume that my frustration is less than the frustration of the pilots and the maintainers out there. ... The primary maintenance responsibility on this is Lockheed and you gentlemen." The Government Accountability Office said the F-35 "continues to fall short of prescribed mission-capable rates and is consistently missing reliability targets". According to the GAO, the F-35A in 2021 was fully mission capable 50% of the time, while the F-35B was fully mission capable less than 20 percent of the time. The F-35c was only capable 9.5% of the time. The signatories call attention to the failures of the program to address harmful projects seeing never ending investment while programs that protect people such as universal healthcare never see the light of day.</p> <p><b>COST TO THE TAXPAYER</b> The failures of the program make the spending impossible to justify, even from a militaristic standpoint. The F-35 program is the Department of Defense's most expensive weapon system program. As of now, the F-35's projected total cost is \$1.7 trillion, which includes \$1.3 trillion in estimated operations and sustainment over 66 years. The F-35 is horribly behind schedule, experiencing massive cost overruns with maintenance costs doubling. The F-35 is not ready for full scale production. According to the GAO, "if DOD moves forward as planned, it will have bought a third of all F-35s before determining that the aircraft is ready to move into full-rate production." Spending billions to trillions of dollars on a plane that is not yet up to speed with what the government has requested is poor fiscal policy.</p> | General Opposition,<br>Multiple Environmental |



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| 131<br>(cont) | Miki and David | Barnes    |                                       | Banks | OR    | <p><b>ENVIRONMENTAL IMPACT</b> F-35s also have a significant impact on the environment with their high carbon emissions and pollution on local bases. The F-35 uses a significant amount of fuel – about 2.37 gallons of fuel for every mile traveled and around 1,340 gallons of fuel per hour. This is particularly egregious compared to the F-35’s predecessor, the F-16, which used at least 415 gallons of fuel per hour less. One single F-35 tank of gas produces the equivalent of 28 metric tons of carbon dioxide. These emissions heavily pollute air and water sources in basing locations in the U.S. and abroad. Base site construction for F-35 training in the U.S. has also disregarded the need for environmental remediation of pre-existing contaminants such as PFAS, risking further pollution of surrounding communities. F35 pollution is an environmental justice issue, as they are disproportionately tested, trained, and deployed in low-income communities of color. These environmental impacts do not even account for the role of the plane in active combat. As they’re deployed around the world, we see Lockheed Martin’s jets subjecting communities globally to egregious noise levels, environmental contamination, and the risk of nuclear warfare. The F-35 is also a part of the U.S. strategic nuclear bomber force, possessing the capability to carry and deploy the B61-12 guided nuclear bomb. If deployed, this bomb - and all other nuclear weapons - would have catastrophic long-term environmental consequences.</p> <p><b>EFFECT ON U.S. LOCALS</b> Currently, F-35 training in Vermont disrupts the lives of working-class people. The training is irregular and Vermonters go without warning of when these trainings will take place. The noise caused by the F-35 hits 115 decibels which especially hurts and injures infants and children, the elderly, and the disabled. The F-35 has 300 to 600 takeoffs and landings a month. Let’s consider the City of Winooski, VT. More than half the city is within the US Air Force designated 5.2 mile by 1.2 mile oval-shaped F-35 noise target zone centered on the runway. Winooski is a working-class city, the most densely populated in Vermont, with the state’s most ethnic diversity. As reported by the US Air Force itself in 2013, repeated exposure to military aircraft noise at the level of the F-35, can damage hearing.</p> <p>The Air Force also reported that the much lower aircraft noise level produced by civilian aircraft was still sufficient to impair the learning and cognitive development of children living in the flight path of heavily used commercial airports. The US Air Force identified the entire oval-shaped noise target zone as an area “generally considered unsuitable for residential use.” So it was no secret for the state’s political and military leaders that locating the F-35 at BTV Burlington International Airport] would cause pain and injury to</p> | General Opposition,<br>Multiple Environmental |

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| 131<br>(cont) | Miki and David | Barnes    |                                       | Banks | OR    | <p>children and adults on a mass scale. In Madison, where the F-35's are likely to end up starting in the next few years, [Update - F35's began flying out of Truax Field in 2023] Physicians for Social Responsibility Wisconsin has identified the following risks to children as a result of loud noise and air pollution:</p> <ul style="list-style-type: none"> <li>• Preterm or low birth weights</li> <li>• Delayed speech development</li> <li>• Hearing loss</li> <li>• Interference with concentration, long term memory, reading and math comprehension</li> </ul> <p>In addition, adults as well as children would face increased risk of:</p> <ul style="list-style-type: none"> <li>• Stress hormones that cause sleep disturbances</li> <li>• Anxiety</li> <li>• PTSD</li> <li>• Asthma</li> <li>• Cancer</li> <li>• Heart disease</li> <li>• Strokes</li> </ul> <p>The costs of this program to the taxpayer, the environment, local communities, and the communities upon which the US and its allies will wage war are too high to justify. It is time for the government to prioritize the welfare of human beings and the planet over military superiority and the weapons industry's profits.</p> <p>For all of the reasons stated above, we oppose F-35 training at Kingsley Field as well as all other locations in Oregon.</p> <p><b>SOURCES</b></p> <p>Ground the F-35. Code Pink.</p> <p>Make or Break Time for the F-35. (5-20-2021). Air and Space Forces Association.</p> <p>Blistering Highlights from the Latest F-35 Sustainment Hearing. (5-9-2022). The Warzone.</p> <p>F-35 Sustainment: Costs Continue to Rise While Planned Use and Availability Has Decreased. (4-15-2024). Government Accountability Office (GAO). GAO-24-106703.</p> | General Opposition,<br>Multiple Environmental |

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|----------|------------|-----------|-----------------------------------------------------------|---------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| 132      | Rose Marie | Varnum    |                                                           | Klamath Falls | OR    | <p>Dear Sir or Madam,</p> <p>I am writing this in support of transitioning the old F15C/D to the new F35A fighter pilot training at Kingsley Field. By transitioning to the newer F35A planes at Kingsley Field the Air National Guard's 173 Fighter Wing can continue to offer the quality of training that is needed to keep their mission to maintain well-trained and well-equipped units for prompt mobilization during combat times and to aid during national emergencies.</p> <p>Bringing in the new planes will require some additional infrastructure, but the Guard has assured me that the additional shops and hangars will not extend beyond their current base footprint, therefore they will not be using any additional land.</p> <p>By transitioning to the newer planes, fighter pilots are guaranteed that their training will be the same high quality that has been given to previous pilots at Kingsley Field in Southern Oregon.</p> <p>The training at Kingsley Field is available without having to compete with incoming and departing commercial flights as there is no commercial passenger service currently at Crater Lake-Klamath Regional Airport. Pilots are given an opportunity to train over a very diverse geographical area within a short distance of Kingsley Field. There is the Cascade Mountain Range to the west and the Pacific Ocean just a short distance by jet from the base where pilots can train in heavily forested areas with mountains. Just a short distance north and east you will find a high desert area that is sparse in vegetation and population, giving the pilots the unique opportunity to train in those climates as well.</p> <p>As you can see from the points I have made above there is a positive reason to bring the Formal Training Unit to Kingsley Field. As there will be no need to bring in more personnel, I am not stating this support from the perspective of adding additional monies to the local economy. I am in support of this proposal because it makes good sense to maintain the quality of training that is given to fighter pilots, preparing them to defend our country against invasion if need be.</p> <p>Sincerely,<br/><i>Rose Marie Varnum</i></p> | General Support  |
| 133      | Udom       | Hong      | Bureau of Land Management, Oregon/Washington State Office |               |       | <p>Hello,</p> <p>BLM Oregon/Washington has reviewed this USAF NOI and has no comments or concerns to submit at this time.</p> <p>Thank you!</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N/A              |

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| 134                                                                               | Martha     | Crucius      | United States Department of the Interior, National Park Service | San Francisco  | CA    | See attached letter.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Recreation, Noise, Wildlife, Nite Skies, Multiple Environmental |
| 135                                                                               | Carol      | Westfall     | Mayor, City of Klamath Falls                                    | Klamath Falls  | OR    | See attached Resolution #24-12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | General Support                                                 |
| 136                                                                               | Caitlin    | Roesler      | United States Environmental Protection Agency, Region 10        | Seattle        | WA    | See attached letter.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Multiple Environmental                                          |
| <b><i>Comments Received During the Public Scoping Meeting – June 26, 2024</i></b> |            |              |                                                                 |                |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                 |
| 137                                                                               | Anonymous  |              |                                                                 |                |       | I strongly advocate for establishing the F-35A Formal Training unit at Kingsley Field ANG. This initiative presents a significant opportunity for the future of Klamath Falls and promises enduring benefits for generations of Klamath families. The personnel stationed at the base are integral members of our community, contributing not only as service members but also as active participants in real life. They raise their families here, with some being native to Klamath falls, actively supporting local businesses owning homes, empowering community activities such as coaching local sports teams. Many long service members of Kingsley Field have deep trust to the region, with their children completing their education from young to college locally, while their spouses contribute to the civilian workforce. The base's symbiotic relationship with the community is evident in the overwhelming support it receives from locals, who are staunch advocates of our military presence. | General Support                                                 |
| 138                                                                               | Dwane      | Hardenburger | D&D Cattle Co, LLC                                              | Klamath Falls, | OR    | The EIS presentation was very informative and well attended. Subject matter expertise were available to address salient questions. Hopefully, funding, et al, will fall into step to accommodate getting the F-35's operational at Kingsley Air National Guard Base.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support                                                 |
| 139                                                                               | Anonymous  |              |                                                                 |                |       | If we do not get the F35 what is the economic impact on the city of Klamath Falls?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Socioeconomics                                                  |
| 140                                                                               | Brandon    | McGraw       |                                                                 |                |       | I do not see any alternative to F35s being stationed at Kingsley Field. Kingsley Field and its members are the life blood of the Klamath Falls Community. Without an aircraft change at Kingsley Field, the 173 Fighter Wing risks losing a mission and with that potential losing a thousand plus members and millions of dollars into the community and other outlying communities. We can not risk Kingsley's next mission!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | General Support, Socioeconomics                                 |

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| 141      | Adam       | Stacey          | Custom Jiu Jitsu                      | Klamath Falls | OR    | What economic impact does the 173 FW bring to the community? Millions? Billions? Will the F-35 mission solidify the continued economic benefit to the basin?<br>I believe the future of Klamath looks bright. Solidifying the mission would in my opinion bring a possible wave of economic growth.<br>Long short: I fully endorse the F-35 FTU mission in Klamath falls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | General Support, Socioeconomics |
| 142      | Cally      |                 |                                       |               |       | I don't have many concerns. I feel the pros in the mission outweigh the cons. I am an advocate for moving forward.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | General Support                 |
| 143      | Elaine     | Bries           |                                       | Klamath Falls | OR    | Kingsley Field has a substantially greater impact on the community than any other business or organization in the basin. The noise complaints are few and far between and the good outweigh the bad. Kingsley brings in substantial revenue in the form of people moving to Klamath to serve and be a part of something bigger than themselves. Our members are so deeply embedded in this community to make it better. Our members are coaches and police officers, fireman, EMTs, etc. The mission and these incredible aircraft bring a tent of safety and security. I've lived by the base for 28 years and never have more of a sense of safety than when they fly. Our children watch the aircraft and get excited to serve their country. Kingsley members are out doing community service, building relations, and overall making Klamath + Oregon a better place. Bringing in the F35s is going to continue the great mission and make everything continue to grow and develop in Klamath Falls. Not having 35s and stopping the mission would take jobs and money away from the community. | General Support, Socioeconomics |
| 144      | Martin     | Balalas         |                                       |               |       | 1 squadron is awesome, but we need two! Push to attain additional aircraft soonest!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | General Support                 |
| 145      | Joesph     | Odette-Spillner |                                       |               |       | Staging a training base here is a great idea. Due to our ailing economy, this base is one of the biggest sources of employment and town revenue. Due to the potential explosive hazard of the F-35 in lightning, we should invest heavily into lightning protection, especially before next fire season.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | General Support, Socioeconomics |
| 146      | William    | Brow            | 173 FW                                | Klamath Falls | OR    | I support this new training mission and the potential for what it offers the community: Jobs, financial support for the community. Kingsley Field is a huge supporter of the local community with its members and their involvement helps support the greater Klamath Basin.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | General Support, Socioeconomics |
| 147      | Jacob      | Z.              |                                       | Klamath Falls | OR    | Hi my name is Jacob. I think the F-35 is cool and helps our military families.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | General Support                 |
| 148      | Corey      | Lingren         |                                       | Klamath Falls | OR    | I believe that this F-35 mission will truly have a beneficial effect on Klamath Falls. The benefits seem to outweigh any negatives.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | General Support, Socioeconomics |

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|----------|-------------|-----------|---------------------------------------|---------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 149      | Christopher | Memer     |                                       | Klamath Falls | OR    | Kingsley Field not only excels in training fighter pilots, but also serves as a cornerstone of our community, fostering economic growth and providing invaluable support. Their dedication not only strengthens our national defense, but also enriches our local area with opportunities and pride.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | General Support, Socioeconomics |
| 150      | Robert      | Kingzett  | Retired JELD WEN Administrator        |               |       | <p>Dear EIS Project Manager,</p> <p>This letter is being written with the strongest possible support for this EIS study evaluating the posting of an F-35 squadron of planes at Klamath Falls, Kingsley Field in the near future. In my 46 years in Klamath Falls, I have been blessed to work on a number of very significant projects. Some projects are truly vital and incredibly meaningful to one's community and region and the F-35 project is at the top of that list for Klamath Falls and the basin.</p> <p>Kingsley has been a US Airforce and National Guard base in Klamath Falls (at various sizes and levels) for over 70 years. For the last 25 years our primary aircraft has been the reliable/remarkable F-15. And now if all process matters conclude successfully, F-35s would be at Kingsley in the matter of months, and this development is projected to extend the life of Kingsley by at least 30 years. In measuring the importance of Kingsley Field to the Klamath Basin, Kingsley has a direct positive economic impact of over \$100 million per year. The base has the biggest workforce in the Basin with over 1,400 men and women. With the F035 wing, Kingsley is projecting an amazing half billion dollars of spending to upgrade facilities and runway structures associated with getting the F-35 squadron and other upgrade priorities.</p> <p>I am not that familiar with how extensive and diverse the EIS considerations are for a project such as this one but will make a couple of comments. In terms of any waste, debris or negative sight images, Kingsley is meticulous about how the property is looked after and cared for. When machinery, airplanes or parts are at the end of their service life they are properly disposed of, in-other-words Kingsley has demonstrated being excellent environmental stewards.</p> <p>With the operation of jets, there is noise associated with their flight operations. The Klamath Basin is an incredibly strong supporter of the military. We love our national guard, its personnel and Kingsley Field. The noises associated with flying jets is the noise of freedom, and something we respect and support. Kingsley schedules its flying hours to respect the public and only occasionally has night flights and when people would be resting or at sleep.</p> <p>Thanks for all your efforts to conduct a thorough EIS study on this matter and we fully expect the results will be positive and we will be seeing a magnificent F-35 flying our skies later this year for decades to come.</p> <p>Respectfully submitted.</p> | General Support, Socioeconomics |
| 151      | Nicholas    | Ramsey    | 173 FW                                | Klamath Falls | OR    | I look forward to the F35 coming to Klamath Falls. I think it will help sustain and boost the local economy for years to come. I hate to think what would happen to the town if the F-35 didn't come here and the F-15 aged out of service.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | General Support, Socioeconomics |

***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
Final – September 2026***

| Entry ID | First Name | Last Name   | Organization/<br>Affiliation (if any) | City          | State | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Comment Category                |
|----------|------------|-------------|---------------------------------------|---------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 152      | Scott      | Siracusa    | Running Y Resort                      | Klamath Falls | OR    | The F-35A mission is extremely important to the Klamath Falls Community. We value not only the economic impact but also the relationship we have with the men and women who serve. The value they bring is vital to our community.<br>From a personal perspective, as one of the owners of the Running y Resort, we enjoy the economic impact each time a military member stays with us, we also truly value the relationships we share. The guests from Kingsley are always extremely respectful of our staff and guests alike. From my business partner, Bill Lynch, and I, our staff, and our community we fully support this mission.                                                                                               | General Support, Socioeconomics |
| 153      | Tom        | Howars      | Kingsley Field ANG                    |               |       | I feel this is a great opportunity for Klamath Falls to grow in the right direction. This will bring more growth with employment throughout the community. From Kingsley field to restaurants, construction, medical, the list goes on. I think as a community this is a chance that we can't afford to pass up. Thank you.                                                                                                                                                                                                                                                                                                                                                                                                             | General Support, Socioeconomics |
| 154      | Lucas      | Zoll        | 173 FW                                | Klamath Falls | OR    | The opportunity for Kingsley Field to accept a new airframe is instrumental for Klamath Falls. Continuing the mission at Kingsley Field allows the community to have job availability, income, and community support. The best thing that could happen for Kingsley and Klamath is for the EIS to move faster than scheduled. The vast majority of the community love the base and love what we do, training fighter pilots.<br>I believe that Klamath County will need more resources to complete this project but with neighboring larger counties, I don't see this being an issue. The 173 FW has great leaders motivated to continue our mission and I hope the community and the Air Force support us as we make this conversion. | General Support, Socioeconomics |
| 155      | Kent       | Pom Padilla | Legacy Furniture/<br>Bedroom Gallery  |               |       | We fully support the vital mission that 173 brings to the community. As the community grows, we think its important for the base mission to grow as well. Basing F-35A Lightening 2 formal training unit as Kingsley Field will be good for the community and good for the air force.                                                                                                                                                                                                                                                                                                                                                                                                                                                   | General Support, Socioeconomics |
| 156      | Mike       | Shirar      | Kingsley Field                        | Klamath Falls | OR    | I fully support the 173 FW conversion to the F-35. I believe the community benefits greatly from its longstanding relationship with the base and I feel that this conversion will help continue to the mutual benefit of all parties. The basin fully supports Kingsley Field and will continue to benefit from the jobs, revenue, and economic benefit from this association. I have zero concerns or reservations regarding the environmental impact or any change in the eco-footprint which already exists.                                                                                                                                                                                                                         | General Support, Socioeconomics |

*Note:* Blank cell indicates no information was provided in the comment.

*Legend:* cont = continued





July 10, 2024

**Subject: F-35 Mission at Kingsley Field - Environmental Impact Statement (EIS)**

To Whom it May Concern,

In anticipation of the upcoming scoping meeting regarding the prospective F-35 Mission at Kingsley Field, I am writing on behalf of the Klamath County Economic Development Association (KCEDA) to express our organization's support for the base and this important mission.

KCEDA is the area's lead economic development agency, focused on being a proactive force in business recruitment, retention, expansion, and scalable entrepreneurship. In the work we do, we strive to catalyze a flourishing economic climate, where local entities have the best opportunities to be successful. As we seek to build on the momentum the regional economy has recently experienced, it is critical that our community retain and help advance Kingsley Field. As one of the Top 5 employers in the area, Kingsley Field has for several decades been a major asset of the regional economy.

The economic impact Kingsley Field provides to the region cannot be underscored enough, and the F-35 mission presents an opportunity for that impact to be further enhanced. If you refer to the information listed below, it becomes clear that this mission introduces numerous opportunities for our community's future:

- The base provides an annual economic impact of \$129M into the region.
- The proposed mission would add between \$250M-\$500M of capital investment into the economy through new construction projects. These projects would generate supplemental economic benefits, creating a multiplier effect on local industry which would further job creation and enable more investment in the regional economy.
- The new mission would allow for base operations to continue for the next 30 years, ensuring the retention of 1,400 employees (nearly all paying local property taxes).
- Kingsley Field is deeply tied to the community, especially in education. Oregon provides those who serve in the Air National Guard a free education, where as a result, the base has become an ideal training center for a wide range of professional interests (logistics, journalism, engineering, etc.), creating an opportunity that appeals to young adults and early professionals across the state. As a result, they have become a valued stakeholder in developing a skilled workforce locally.

Based on these reasons, we strongly believe that the F-35 Mission is important to our region's economic resilience and support the new F-35 mission. I ask that you please give thorough consideration to these comments, and if there are any questions you have for our organization, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Randy Cox". The signature is stylized with a large, looped "R" and a cursive "Cox".

**Randy Cox**  
CEO, KCEDA



## United States Department of the Interior

NATIONAL PARK SERVICE  
Interior Regions 8, 9, 10, and 12  
555 Battery Street, Suite 121  
San Francisco, CA 94111



IN REPLY REFER TO:  
1.D. (PW-P)

Mr. Devin Scherer  
National Guard Bureau  
NGB/A4FR 3501 Fetchet Avenue  
Joint Base Andrews, MD 20762  
(email: [NGB.A4.A4A.NEPA.COMMENTS.org@us.af.mil](mailto:NGB.A4.A4A.NEPA.COMMENTS.org@us.af.mil), including “F-35A Beddown EIS” in the subject line)

SUBJECT: F-35A Beddown EIS

Dear Mr. Scherer:

Thank you for the opportunity to comment on the Department of the Air Force Notice of Intent for the F-35A Lightning II Formal Training Unit Beddown Environmental Impact Statement (EIS). The proposed beddown, operation, and associated infrastructure construction of one FTU squadron of F-35A aircraft at Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon has potential to impact nearby significant natural and cultural resources at Lava Beds National Monument (LBE), including Lava Beds Wilderness; Tule Lake National Monument (TULE); Crater Lake National Park (CRLA), and sections of the California National Historic Trail (California NHT) and Pacific Crest National Scenic Trail (Pacific Crest NST). The National Park Service (NPS) is mandated to protect the acoustic environment and night skies of NPS units. The Wilderness Act of 1964 protects unique qualities of wilderness—untrammelled by humans, natural conditions primarily affected by the forces of nature, and outstanding opportunities for solitude or a primitive and unconfined type of recreation – within designated Wilderness Areas.

### ACOUSTIC ENVIRONMENT

We understand that the F-35 series of aircraft is much louder than the F-15 series of aircraft. The NPS respectfully requests the DAF to consider minimizing low level flights of these aircraft over NPS administered lands, and to implement methods that would reduce the overall noise signature of the aircraft.

The NPS requests that LBE, TULE, CRLA, California NHT and Pacific Crest NST be considered and analyzed in the EIS as noise sensitive areas. These national park units and national trails preserve quiet acoustic environments featuring natural and contemplative soundscapes. We request maps of Special Use Airspace, Training Flight Routes, or other Military Operations Areas associated with the proposed action at Kingsley Field to determine the relationship to NPS areas.

Acoustic monitoring data collected in LBE in August-September 2014 indicate that median existing ambient sound levels there are between 18.2-25.4 dBA (A-weighted decibels.<sup>1</sup>) during the day and 16.3-20.3 dBA at

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<sup>1</sup> A-weighted sound pressure levels in decibels, calibrated to account for the sensitivity of the human ear.

INTERIOR REGION 8 • LOWER COLORADO BASIN\*  
INTERIOR REGION 9 • COLUMBIA—PACIFIC NORTHWEST\*  
INTERIOR REGION 10 • CALIFORNIA—GREAT BASIN  
INTERIOR REGION 12 • PACIFIC ISLANDS

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AMERICAN SAMOA, ARIZONA\*, CALIFORNIA, GUAM, HAWAII, IDAHO, MONTANA\*,  
NEVADA, NORTHERN MARIANA ISLANDS, OREGON, WASHINGTON  
\*PARTIAL

night. As described in the final Acoustic Monitoring Report (Pipkin 2017), “This quiet setting provides a very special dimension to the park experience.” Nonetheless, results also indicate that aircraft noise (combined military and civilian) is audible up to 25.2% of the time within LABE, already impacting the natural acoustic environment. At CRLA, preliminary acoustic monitoring in 2010 indicated that aircraft noise “may cause Pacific tree frogs (*Pseudacris regilla*) to cease breeding vocalizations temporarily” (Hering, 2011). The NPS seeks to improve conditions, when possible, and at the very least, prevent further degradation.

The NPS recommends that the EIS include detailed information to promote a sound understanding and evaluation of potential impacts of the proposed beddown on the acoustic environment in national park units and national trails. We suggest:

1. The current number of flight operations, broken down by Special Use Areas or training flight paths, altitudes, and timing.
2. Proposed changes to the number of flight operations under each alternative, divided according to areas or paths, altitudes, and timing.
3. The noise profiles of current F-15C/D aircraft as compared to the noise profiles of F-35A aircraft, in terms of single-event sound exposure levels and single-event maximum sound levels at expected altitudes over or within audibility of the park units.
4. Estimates for current overall noise exposure — ideally Rate-Adjusted Monthly Day-Night Average Sound Level ( $L_{dnmr}$ ) — audible under Special Use Areas or flight paths in comparison with modeled estimates for overall noise exposure under the proposed alternatives.
5. Estimated changes to the DNL and maximum  $L_{dnmr}$  at representative locations within NPS units, under the proposed alternatives.
6. Any of the three acoustic monitoring sites at LABE (Hovey Point, Cave Loop Road, and at the center of the park within the Wilderness Area) would be ideal locations for this acoustic data collection and analysis, as the NPS already has data for them; NPS can share coordinates for these sites. The Tule Lake Visitor Center, Indian Well Campground in LABE, and any of the designated backcountry campsites in CRLA would also be good options.
7. Estimates of the number of noise events above and/or percent time above the following sound thresholds, for representative locations within NPS units:
  - 35 decibels (dB) Day Night average sound level (DNL) or one-second A-weighted time averaged sound levels ( $L_{Aeq,1s}$ ) [12.5–20,000 Hertz (Hz)]: ANSI standard for quiet settings where outdoor sound levels exceeding 35 dB degrade the experience of outdoor performance venues; indicator of quality for the acoustic environment in NPS units (Betchkal et al., 2023).
  - 40 dBA: Level at which terrestrial wildlife begin to respond to environmental noise (Shannon et al., 2016).
  - 52 dB  $L_{Aeq}$ : Level at which noise interferes with raised-voice communication at 10 meters (EPA 1974), such as interpretive programs at NPS units.
  - 60 dB  $L_{Aeq}$ : Level at which normal conversation (EPA 1974), such as between visitors at an NPS unit, is interrupted.
8. Potential impacts to wildlife, based on estimated changes to the acoustic environment under the proposed alternatives.

## NIGHT SKIES

The NPS is mandated to protect dark night skies from anthropogenic light. If any of the proposed alternatives require changes to facilities on base and/or construction of new facilities, we respectfully request that the Air Force strive to mitigate sky glow by integrating [Sustainable Outdoor Lighting Principles](#):

1. Ensure the lighting is necessary.
2. Light only where needed.
3. Use recessed and fully shielded fixtures.
4. Light only when needed.
5. Minimum light level necessary.
6. Use LEDs in warm colors.

Thank you for considering these comments. For questions or further information, contact Ms. Tyra Olstad, NPS Natural Sounds and Night Skies Division ([tyra\\_olstad@nps.gov](mailto:tyra_olstad@nps.gov)) or Mr. Chris Mengel, Superintendent of Lava Beds National Monument and Tule Lake National Monument ([chris\\_mengel@nps.gov](mailto:chris_mengel@nps.gov)).

Sincerely,

**MARTHA CRUSIUS** Digitally signed by MARTHA CRUSIUS  
Date: 2024.07.01 19:03:27 -07'00'

Martha Crusius  
Park Planning & Environmental Compliance Manager  
National Park Service  
Interior Regions 8, 9, 10 & 12

## REFERENCES

Betchkal D. H., J. A. Beeco, S. J. Anderson, B. A. Peterson, and D. Joyce. 2023. Using aircraft tracking data to estimate the geographic scope of noise impacts from low-level overflights above parks and protected areas. *Journal of Environmental Management* Vol 348. <https://doi.org/10.1016/j.jenvman.2023.119201>.

Hering, D. 2011. Research Project Proposal: "Do anthropogenic sounds affect calling patterns of Pacific Tree Frogs at Crater Lake National Park?" Permit CRLA-2011-SCI- 0013.

Pipkin, A.R. 2017. Lava Beds National Monument: Acoustic monitoring report. Natural Resource Report NPS/LABE/NRR—2017/1409. National Park Service, Fort Collins, Colorado.

Shannon, G., McKenna, M., Angeloni, L., Crooks, K., Fristrup, K., Brown, E., Warner, K., Nelson, M., White, C., Briggs, J., McFarland, S., and Wittemyer, G. 2016. A synthesis of two decades of research documenting the effects of noise on wildlife. *Biological Reviews* 91(4):982-1005.

U.S. Environmental Protection Agency (EPA). 1974. Information on levels of environmental noise requisite to protect public health and welfare with an adequate margin of safety. Washington, D.C.: EPA.



RESOLUTION NO. 24-12

**A RESOLUTION OF SUPPORT FROM THE CITY OF KLAMATH FALLS FOR  
THE US AIR FORCE AND AIR NATIONAL GUARD SERVICES TO OPERATE  
THE NEW MISSION OF THE 173<sup>RD</sup> FIGHTER WING UNDER THE  
F-35 LIGHTNING II PROGRAM IN THE CITY OF KLAMATH FALLS, OR**

WHEREAS, Klamath Falls has been a proud military aviation community since the US Navy first opened the Klamath Falls Naval Air Station in 1942;

WHEREAS, In 1954 the US Air Force took over the aviation facilities and operated a fighter-interceptor air wing to help protect the US West Coast, operating the military facilities on the airport-owned facility by the City of Klamath Falls;

WHEREAS, On July 3, 1956, the US Air Force dedicated the Klamath Falls Air Base to the memory of Second Lieutenant David R. Kingsley who was killed in action while saving the members of his crew in 1944;

WHEREAS, In 1982, following a long track record of US Air Force Aviation excellence in operating Fighter Interceptors, the Oregon Air National Guard took over Kingsley Field as a principal pilot training facility for the F-4 Phantom interceptors;

WHEREAS, In 1988, the F-4 Phantom Mission transitioned to the new F-16 Fighting Falcon training for the US Air Force and Oregon Air National Guard pilots and aircrew;

WHEREAS, In 1998 the Kingsley Field Mission again changed to training F-15 Eagle pilots under the auspices of the 173<sup>rd</sup> Fighter Wing of the Oregon Air National Guard, proudly carrying on the tradition of training the best fighter pilots in the world;

WHEREAS, today, the 173<sup>rd</sup> Fighter Wing is being considered for transition to the F-35 Lightning II aircraft as the F-15 Eagle is being retired and the United States Department of the Air Force and National Guard Bureau is conducting an Environmental Impact Statement review of the proposed changes in airframes;

WHEREAS, the 173<sup>rd</sup> Fighter Wing and its over one thousand dedicated men and women, both military and civilian, who work at Kingsley Field are valued and appreciated members of the Klamath Falls Community, and NOW, THEREFORE,

**THE CITY OF KLAMATH FALLS RESOLVES AS FOLLOWS:**

**Section 1**

The City Council of the City of Klamath Falls, hereby supports the US Air Force and Air National Guard in its decision to operate the new Mission of the 173<sup>rd</sup> Fighter Wing under the

F-35 Lightning II Program, to be located here in Klamath Falls at the City-owned Kingsley Field Air Base Facility, and that the City of Klamath Falls is proud to proclaim its continued support for the 82-year partnership between the US Military Services and the City of Klamath Falls.

**Section 2**

The City supports the proposed action as the preferred alternative.

**Section 3**

The City requests *Cooperating Agency* status, as the owner of the Crater Lake-Klamath Regional Airport.

**Section 4**

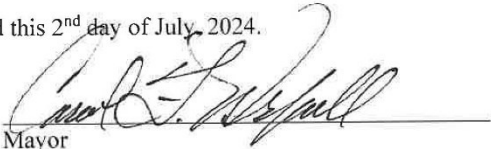
The City believes the project level of review should fall under a Categorical Exclusion (CE), or an Environmental Assessment (EA) *at most*; not an Environmental Impact Statement (EIS).

**Section 5**

This Resolution shall become effective immediately upon enactment.

Passed by the Council of the City of Klamath Falls, Oregon on the 1<sup>st</sup> day of July, 2024.

Presented to the Mayor, approved and signed this 2<sup>nd</sup> day of July, 2024.

  
\_\_\_\_\_  
Mayor

ATTEST:

  
\_\_\_\_\_  
City Recorder

STATE OF OREGON                     )  
COUNTY OF KLAMATH            ) ss.  
CITY OF KLAMATH FALLS         )

I, \_\_\_\_\_, City Recorder for the City of Klamath Falls, Oregon, do hereby certify that the foregoing is a true and correct copy of a Resolution duly adopted by the Council of the City of Klamath Falls, Oregon, at the meeting held on the 1<sup>st</sup> day of July, 2024, and thereafter approved and signed by the Mayor and attested by the City Recorder.

\_\_\_\_\_  
City Recorder

***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
at Kingsley Field ANGB, Klamath Falls, Oregon  
Final – September 2026***

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**REGION 10**  
SEATTLE, WA 98101

July 11, 2024

Devin Scherer  
National Guard Bureau  
NGB/A4FR 3501 Fetchet Avenue  
Joint Base Andrews, Maryland 20762

Dear Devin Scherer:

The U.S. Environmental Protection Agency has reviewed the National Guard Bureau's Notice of Intent to Prepare an Environmental Impact Statement for F-35A Lightning II Formal Training Unit Beddown at Kingsley Field Air National Guard Base, Klamath Falls, Oregon (EPA Project Number 24-0037-NGB). The EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The NOI states that the EIS will evaluate the potential environmental impacts of replacing the legacy F-15C/D aircraft with F-35A aircraft at Kingsley Field Air National Guard Base in Klamath Falls, Oregon. The project includes beddown, operation, and associated infrastructure construction of one formal training unit squadron of F-35A Lightning II (F-35A) aircraft. The squadron will consist of 24 F-35A Primary Aerospace Vehicles Authorized and two Backup Aerospace Vehicles Authorized and will replace the existing 26 F-15C/D aircraft currently operating at Kingsley Field ANGB. The EIS will also assess a No Action Alternative.

Thank you for the opportunity to review the scoping announcement for this project. If you have questions about this review, please contact Stephani Michelsen-Correa of my staff at 206-553-2116 and michelsen-correa.stephani@epa.gov, or me, at 206-553-6518 or at roesler.caitlin@epa.gov.

Sincerely,

**CAITLIN  
ROESLER**

Digitally signed by  
CAITLIN ROESLER  
Date: 2024.07.11  
10:50:45 -07'00'

Caitlin Roesler, Acting Manager  
National Environmental Policy Act (NEPA) Branch

Enclosure



**U.S. EPA Detailed Scoping Comments on the  
F-35A Lightning II Formal Training Unit Beddown at  
Kingsley Field Air National Guard Base  
Klamath County, Oregon  
July 2024**

**Purpose and Need**

The purpose of the proposed action is typically the specific objectives of the activity, while the need for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity. In the EIS, clearly identify the purpose and need to which National Guard is responding in proposing the alternatives. Discuss the proposed project in the context of the other projects ongoing or proposed in the area.

**Alternatives**

The EPA recommends the EIS include a reasonable range of alternatives that meet the stated purpose and need for the project which are responsive to the issues identified during the scoping process. We encourage selection of alternatives that protect, restore, and enhance the environment. The EPA supports efforts to identify and select alternatives that avoid, minimize, and/or otherwise mitigate environmental impacts. Describe the rationale used to determine whether impacts of an alternative are significant or not. Present environmental impacts of the proposed action and alternatives in comparative form to define the issues and provide a clear basis for choice among options by the decision maker and the public. Describe how each alternative was developed, how it addresses program objectives, and how it will be implemented. Quantify the potential environmental impacts of each alternative to the greatest extent possible (e.g., changes in baseline noise conditions, acres of habitat impacted, changes in water quality).

**Baseline Environmental Conditions**

When evaluating effects, the EPA recommends using existing environmental conditions as the baseline for comparing impacts across all alternatives, including the no action alternative. Describing the baseline environmental conditions provides a useful frame of reference for quantifying and/or characterizing magnitudes of effects and understanding each alternative's potential impacts and benefits. This description also allows for future changes to environmental resources to be more accurately measured for all alternatives, including the no action alternative. Detail environmental protections already in place that are based on current conditions, such as noise limits and flight restrictions.

We recommend the EIS present impacts to resources as a comparison to the existing conditions baseline using consistent methods of measuring project impacts for all alternatives. Consider the following when defining baseline conditions:

- Verify that historical data are representative of current conditions.  
Include resources directly impacted by the project footprint, as well as the resources indirectly (or secondarily) impacted by the project (e.g., areas impacted by flyovers).

#### **Noise**

The project has the potential to impact noise conditions. The EPA recommends evaluating noise abatement and completing an investigation and study of noise from the proposed project and alternatives. Topics to consider addressing include:

- Effects at various noise levels.
- Projected growth of noise levels in nearby residential areas.
- The psychological and physiological effect on humans.
- Effects of sporadic extreme noise as compared with constant noise.
- Effect on wildlife.
- Effect on property (including values).
- Other matters of interest in the public welfare.

#### **Water Quality**

##### ***Clean Water Act § 402***

The EPA recommends the EIS identify any discharges to Waters of the United States (WOTUS) that are known, or are likely, to occur during construction and operation of the project and how these discharges would be managed and minimized. Identify the Clean Water Act § 402 NPDES permits that will be obtained for the construction phase, new (or modifications to) existing permits for operations, and how any previous permit exceedances could be prevented by incorporating pollution prevention measures into the project.

##### ***CWA § 404***

CWA § 404 requires permits from the U.S. Army Corps of Engineers for the discharge of dredged or fill material into WOTUS. Wetlands, vegetated shallows, mud flats, and cobble substrates are all considered special aquatic sites under the CWA § 404(b)(1) Guidelines (40 CFR 230). The EPA recommends that the EIS:

- Clearly identify any discharges to WOTUS that are known, or likely, to occur that will be subject to CWA § 404. Identify and describe the impact of those discharges, control measures to be employed to address those impacts, and best management practices to prevent discharge of water and pollutants.
- Structure the alternatives analysis consistent with requirements of both the CWA and NEPA.
- Describe the regulatory criteria and processes utilized to screen potential alternatives and thoroughly evaluate alternatives that would pose less adverse impacts.
- Describe how compensatory mitigation will be quantified and provided to offset impacts, with specific project examples and options, as available.

For context on the CWA § 404(b)(1) analysis, the Guidelines include four main requirements (40 CFR 230.10 (a) through (d)):

##### Least Environmentally Damaging Practical Alternative (LEDPA) Determination - Section 230.10(a)

A CWA § 404 permit can be issued for the LEDPA only. Practicable alternatives are those that are capable and feasible of being done after taking into consideration costs, technology, and

logistics. Costs alone cannot make a project not practicable. CWA § 404 permit decisions require a comprehensive evaluation of the range of alternatives to ensure the permitted alternative is the LEDPA. Identification of the LEDPA is achieved by performing an alternatives analysis that estimates the direct, indirect, and cumulative impacts to jurisdictional WOTUS that would result from each of the potential project alternatives.

**Water Quality - Section 230.10(b)**

Prohibits permitting projects that would cause or contribute to violations of water quality standards, violates any applicable toxic effluent standard, jeopardizes continued existence of endangered or threatened species and impacts to critical habitat under the Endangered Species Act.

**Significant Degradation - Section 230.10(c)**

Prohibits permitting a project that causes or contributes to significant degradation of aquatic resources. Effects contributing to significant degradation include: (1) adverse effects on plankton, fish, shellfish, wildlife, and special aquatic sites (40 CFR 230.10(c)(1)), (2) adverse effects on life stages of aquatic life (40 CFR 230.10(c)(2)), (3) aquatic ecosystem diversity, productivity, and stability including loss of fish and wildlife habitat (40 CFR 230.10(c)(3)), and (4) impairment or destruction of endangered species habitat (40 CFR 230.30(2)).

**Mitigation - Section 230.10(d)**

Requires compensatory mitigation for unavoidable impacts to aquatic resource functions. The 2008 Joint EPA-Corps Federal Mitigation Rule (40 CFR 230.91-98) establishes a preference for compensatory mitigation based on a watershed approach, which can ensure that potential direct and indirect impacts of the project are offset. In addition to identifying all measures to avoid and minimize adverse impacts to the aquatic environment (showing compliance with 40 CFR Part 230.10(a)), for unavoidable impacts, identify compensatory mitigation.

***CWA § 401***

The CWA provides states and authorized tribes the authority to grant, deny, or waive certification of proposed federal licenses or permits that may discharge into WOTUS. This section of the CWA is an important tool for states and authorized tribes, in collaboration with federal agencies, to help protect the water quality of federally regulated waters within their borders. In developing the EIS, the EPA recommends early coordination with the State of Oregon regarding CWA § 401 for the purposes of streamlining regulatory processes.

***CWA § 303(d)***

The CWA requires states to develop a list of impaired waters that do not meet water quality standards, establish priority rankings, and develop Total Maximum Daily Loads (TMDLs) to improve water quality. The EPA recommends the EIS include information on any CWA § 303(d) impaired waters in the project area and any efforts related to TMDLs. Discuss what effect, if any, project discharges may have on impaired waterbodies. The EPA recommends the EIS describe existing restoration and enhancement efforts for those waters, how the proposed project will coordinate with on-going protection efforts,

and any mitigation measures that will be implemented to avoid further degradation of impaired waters.

#### **Air Quality**

The EPA recommends the EIS discuss ambient air conditions (existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant non-attainment areas in the analysis area and vicinity. Demonstrate compliance with state and federal air quality regulations and disclosing the potential impacts from temporary or cumulative degradation of air quality. Characterize existing air quality conditions to set the context for evaluating project impacts, including identification of:

- Each of the criteria pollutants and their appropriate NAAQS, i.e., ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and lead.
- Prevention of Significant Deterioration increment at potentially impacted Class I and Sensitive Class II Areas.
- Sensitive receptors in the vicinity (such as population centers, nonattainment areas, and Class II areas with sensitive resources).
- Airshed classifications and monitored baseline conditions (design values) for each criteria pollutant.
- Any regional concerns in the area (e.g., ozone, PM2.5, seasonal wildfire smoke).

Evaluate whether project activities could affect air quality and include measures in the EIS that are needed to prevent significant impacts. Examples of potential air emissions associated with the proposed project activities include air pollutants from: equipment gasoline and diesel, refueling operations, emissions from idling construction equipment, emissions from vehicles traveling on paved and unpaved roads, and fugitive dust.

#### **Biological Resources**

Identify and quantify which species and/or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. Emphasize the protection and recovery of species due to their status or potential status under federal or state ESA. The EPA recommends the EIS identify and quantify other wildlife species might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. In addition, discuss the project's consistency with existing laws and regulations, including the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

We recommend the EIS include measures for noxious weed management, a description of current conditions, and best management practices, which will be utilized to prevent, detect, and control invasives in the project area. Discuss measures that will be implemented to reduce the likelihood of introduction and spread of invasive species within the proposed project area.

#### **Climate Change**

To improve climate resilience, the EPA recommends that the EIS include a discussion of reasonably foreseeable effects that changes in the climate (e.g., changes in precipitation patterns, hydrology,



vegetation distribution in respective watersheds, and temperature) may have on the proposed project, and what impacts the proposed project will have on climate change consequences.

Consistent with Executive Order 14008 on *Tackling the Climate Crisis at Home and Abroad*, we encourage the National Guard to include management actions to provide for diverse, healthy ecosystems that are resilient to climate stressors; require effective mitigation and encourage voluntary mitigation to offset the adverse impacts of projects or actions; reduce greenhouse gas emissions from authorized activities to the lowest practical levels; identify and protect areas of potential climate refugia; reduce barriers to plant migration; and design facilities to mitigate potential structural impacts associated with extreme weather events.

#### **Environmental Justice**

Executive Order 14096 on *Revitalizing Our Nation's Commitment to Environmental Justice for All* highlights the need for a whole-of-government effort to confront longstanding environmental injustices and inequities. Consistent with Executive Order 12898, Executive Order 14096 calls on each agency to make achieving EJ part of its mission, including by carrying out environmental reviews under NEPA in a manner that analyzes direct, indirect, and cumulative effects of federal actions on communities with EJ concerns.

EJScreen is the EPA's nationally consistent environmental justice screening and mapping tool.<sup>1</sup> EJScreen offers a variety of powerful data and mapping capabilities that enable users to understand details about the population of an area and the environmental conditions in which they live. The tool provides information on environmental and socioeconomic indicators as well as pollution sources, health disparities, critical service gaps, and climate change data. The data is displayed in color-coded maps and standard data reports which feature how a selected location compares to the rest of the nation and state.

Assessing data from EJScreen is a useful first step in identifying locations in the area that may be candidates for further review or targeted outreach. The EPA considers a project to be in an area of potential EJ concern when an EJScreen analysis for the impacted area shows one or more of the EJ Indexes at or above the 80<sup>th</sup> percentile in the nation and/or state. At a minimum, the EPA recommends an EJScreen analysis consider EJScreen information for the block group(s) which contains the proposed action(s) and a one-mile radius around those areas.

It is important to consider all impacted areas by the proposed action(s). Areas of impact can be very focused and contained within a single block group, or broader, spanning across several block groups and communities.<sup>2</sup> Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these

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<sup>1</sup> <https://ejscreen.epa.gov/mapper/>. Accessed 06/24/2024.

<sup>2</sup> Agencies should define community as "either a group of individuals living in geographic proximity to one another, or a geographically dispersed set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions" (Interim Justice40 Guidance – Executive Order 14008 on Tackling the Climate Crisis at Home and Abroad, January 27, 2021).

indicators.<sup>3</sup> Therefore, additional review or outreach may be necessary for the proposed action. To address these potential concerns, the EPA recommends the EIS:

- Apply methods from "Environmental Justice Interagency Working Group Promising Practices for EJ Methodologies in NEPA Reviews" report to project.<sup>4</sup> This report compiles methodologies from current agency practices for integrating EJ considerations in NEPA processes. The Promising Practices Report provides particularly useful guidance in assessing the potential direct and indirect impacts of a project, as well as the potentially increased vulnerabilities certain populations may have due to the cumulative impacts of environmental harm.
- Apply guidance from the Council of Environmental Quality's guidance document "Environmental Justice Guidance Under the National Environmental Policy Act" to this project (CEQ's EJ Guidance).<sup>5</sup>
- Characterize the project site with specific information or data related to EJ concerns.<sup>6</sup>
- Describe potential EJ concerns for all EJ Indexes at or above the 80<sup>th</sup> percentile in the state and/or nation.
- Screen for and describe all individual block groups within or intersecting a 1-mile radius of the project and its areas of impact (e.g., flight paths).
- Describe individual block groups within the project area in addition to an area-wide assessment.

It is important to consider both the potential short-term impacts of the proposed action(s) (e.g., construction noise, flight noise associated with new aircraft and flight paths, disrupted air quality, and viewscape), along with the potential long-term impacts (e.g., noise and air quality disruption due to air traffic, road access, disrupted access to areas of subsistence and traditional use by Indigenous populations) on communities with EJ concerns.

#### **Tribal Consultation**

The EPA encourages the National Guard to consult with Tribes and incorporate feedback from the Tribes when making decisions regarding the project. The EPA recommends the EIS describe the issues raised during the consultations and how those issues were addressed.

#### **Cumulative Effects**

Cumulative impacts are identified in 40 CFR 1508.1(g)(3) as "effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions over a period of time." The EPA recommends that the EIS consider evaluation of

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<sup>3</sup> EPA's Technical Documentation for EJScreen: <https://www.epa.gov/ejscreen/technical-information-about-ejscreen>. Accessed 12/11/2023.

<sup>4</sup> Promising Practices for EJ Methodologies in NEPA Reviews: [https://www.epa.gov/sites/default/files/2016-08/documents/nepa\\_promising\\_practices\\_document\\_2016.pdf](https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf). Accessed 06/24/2024.

<sup>5</sup> Environmental Justice Guidance Under the National Environmental Policy Act: [https://www.epa.gov/sites/default/files/2015-02/documents/ej\\_guidance\\_nepa\\_ceq1297.pdf](https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf). Accessed 12/11/2023.

<sup>6</sup> For more information about potential EJ concerns, refer to the July 21, 2021, Memorandum for the Heads of Departments and Agencies Interim Implementation Guidance for the Justice40 Initiative: <https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>. Accessed 12/11/2023.

impacts over the entire area of impact and consider the effects of the project when added to other past, present, and reasonably foreseeable future projects in the planning area. Consistent with Executive Order 14096, analyze direct, indirect, and cumulative effects of Federal actions on communities with environmental justice concerns.

In the cumulative impacts analysis, identify how resources, ecosystems, and communities in the vicinity of the planning area have already been, or will be, affected by past, present, or future activities. Characterize these resources in terms of their response to change and capacity to withstand stresses.

The EPA recommends focusing on resources of concern or resources that are “at risk” and/or are significantly impacted by the project before mitigation. This analysis provides an opportunity to identify potential large, landscape-level regional impacts, as well as potential large-scale mitigation measures. The EPA recommends that the EIS identify which resources will be analyzed, which ones are not, and why. For each resource analyzed, we recommend identifying the following:

- Current condition of the resource as a measure of past impacts.
- Trends in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis.
- On-going, planned, and reasonably foreseeable projects in the study areas which may contribute to cumulative impacts.
- Future condition of the resource based on an analysis of impacts from reasonably foreseeable projects or actions added to existing conditions and current trends.
- Mitigation measures or conservation management actions that can be consistently and transparently applied to future projects.

#### **Monitoring and Adaptive Management**

The EPA recommends the EIS describe the features of an effective monitoring plan, including adaptive management components, for project activities. In addition to targets that specify a desired future condition, include environmental thresholds with protocols to assess whether specific thresholds are being met for each impacted resource (e.g., water and air resources). The EPA also recommends the EIS describe how and with what resources the National Guard will conduct the monitoring necessary to ensure the project is meeting objectives and avoiding impacts as predicted. Monitoring results may reflect a need to modify management actions. The EPA’s recommendation for adaptive management practices include:

- Specific environmental thresholds that would trigger action.
- Management alternatives and mitigation measures that would be implemented if thresholds are exceeded.
- An evaluation procedure for determining the effectiveness of the implemented mitigation and further measures to take in cases of ineffectiveness. A description of the mechanisms for the public disclosure of monitoring data, its analysis, and related management decisions.



**APPENDIX C2**  
**DRAFT EIS PUBLIC REVIEW AND COMMENT PERIOD**

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## **1.0 SYNOPSIS OF PUBLIC COMMENTS ON THE DRAFT EIS**

### **1.1 OPPORTUNITIES TO COMMENT**

The DAF provided several methods for the public to comment on the Draft EIS. The following is a list of methods made available for commenting during the public review and comment period.

- By mail or email – The DAF invited interested parties to submit comments by mail or email through publication and distribution of the Notice of Availability (NOA), agency coordination letters with fact sheet included, press releases, and newspaper display advertisements.
- Via the project website – The DAF included the project website URL on notifications and the fact sheet. The website included an online submission form and a printable comment form for download.

### **1.2 SUMMARY OF PUBLIC AND AGENCY COMMENTS**

The following section provides a summary of the public and agency comments submitted to the DAF during the Draft EIS public review and comment period.

The DAF received three comment submissions from agencies, listed below.

- City of Klamath Falls, Mayor Westfall
- Klamath Irrigation District
- U.S. Environmental Protection Agency, NEPA Section

The DAF received a total of 42 comments from the public and agencies on the Draft EIS. The method of submission is shown in Table 1.

**Table 1 Summary of Comments Received**

| <i>Submitted via</i> | <i>TOTAL</i>   |
|----------------------|----------------|
| Website              | 31             |
| DAF Email            | 9 <sup>1</sup> |
| Mail                 | 2 <sup>2</sup> |
| <b>Total</b>         | <b>42</b>      |

*Note:* <sup>1</sup>Including one emailed comment received after the public comment period ended.

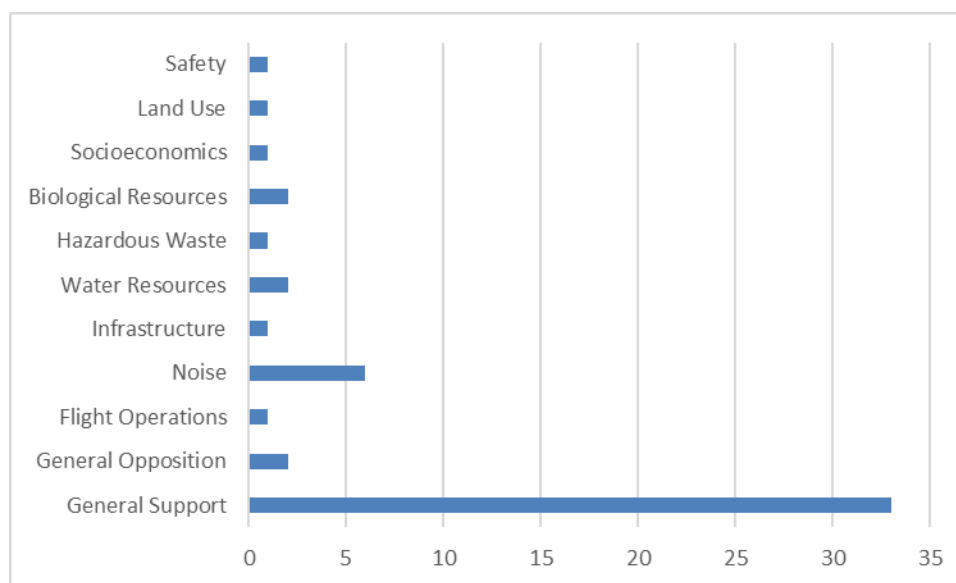
<sup>2</sup>Including two mailed comments post-marked after the public comment period ended.

A summary of public comment topics can be found in Table 2, and comments by category can be found in Figure 1.

**Table 2      Summary of Comment Topics**

| <i>Comment Topics</i> | <i>TOTAL<sup>1</sup></i> |
|-----------------------|--------------------------|
| General Support       | 33                       |
| General Opposition    | 2                        |
| Flight Operations     | 1                        |
| Noise                 | 6                        |
| Infrastructure        | 1                        |
| Water Resources       | 2                        |
| Hazardous Waste       | 1                        |
| Biological Resources  | 2                        |
| Socioeconomics        | 1                        |
| Land Use              | 1                        |
| Safety                | 1                        |
| NEPA Compliance       | 3                        |

*Note:* <sup>1</sup>Some comments received covered multiple topic areas.



**Figure 1      Comments by Category**

1.3 PUBLIC COMMENTS ON THE DRAFT EIS

Table 3 presents written comments submitted to the DAF during the comment period. The DAF reviewed public comments received to ensure that all relevant concerns have been addressed in the Final EIS.

**Table 3 Public Comments on the Draft EIS**

| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------|-------------------|------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                | Dale              | Cross            |                     | Welcome to the Basin, we fully support your mission and all of our military. thank You for your service!                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2                | Levi              | Clarey           |                     | The F35 can't get here soon enough.<br>Get them here in Aug of 26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 3                | Bradley           | RHOADES          |                     | We love Kingsley field and our guardsmen!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4                | Shirley           | Bartholow        |                     | I am concerned about the loud noise and the thrust of the noise taking off over Summers Lane. My kitchen light has already fallen off the ceiling twice. I can't talk on the phone outside enjoy a nice day outside. My walls are cracking from the trust of the planes taking off over my house. I do realize this is a training base. but I can't even talk or enjoy the outdoors. How bout taking off the other way. Little league field can't hear what is going on. My house is slowly. crumpling. Built in the 40's. I believe in everything your doing. What about us? | Thank you for your comment. Section 3.2, Noise, of the EIS evaluates aircraft noise and vibration associated with existing and proposed operations at Kingsley Field ANGB, including residential areas near the airport. The EIS identifies significant noise effects around LMT/Kingsley Field ANGB under the Proposed Action due to the increased number of people exposed to aircraft noise. The 173 FW implements noise mitigation procedures when they can be accomplished safely; when wind speed, wind direction, weather, air traffic control, aircraft performance, and mission requirements allow, F-35A aircraft would prioritize departures to the south to reduce noise over Klamath Falls and nearby recreational areas. However, departures to the north over Summers Lane are sometimes necessary to ensure safe aircraft operations. |
| 5                | Gary              | Pederson         | Private Citizen     | I am OPPOSED to these new Jets coming to Klamath Falls. My home value will drop drastically... I may not even be able to sell my home... the noise level will hurt                                                                                                                                                                                                                                                                                                                                                                                                            | Thank you for your comment. The EIS identifies significant noise effects around LMT/Kingsley Field ANGB under the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------|-------------------|------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                   |                  |                     | my wife and my ears, and as Seniors in our late 70's we will be forced to move... at a substantial loss.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Proposed Action due to the increased number of people exposed to aircraft noise. The DAF recognizes that increased aircraft noise can affect residents' quality of life and may influence individual concerns about remaining in or selling a home. The evaluation in the Final EIS does not predict changes to individual property values or whether specific homeowners may choose to relocate. However, the effects of aircraft noise were evaluated and disclosed in Section 3.2 of the Final EIS.                                                                                                                                                                                                                                                               |
| 6                | Clinton           | Wells            |                     | This will be great for Klamath Falls and the state of Oregon!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 7                | Ron & Kathy       | Dillon           |                     | I am excited to hear we may have jets back in Klamath. I live very close to the Air Base and love listening to the jets. Have lived in Klamath my whole life (60 years) and never have been bothered by their flyovers. Let's bring in the F-35s                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 8                | Gary              | Pederson         | Private Citizen     | <p>Everyone around my home at 4441 Southside Expressway and into Gatewood, are going to be DRASTICALLY impacted by these Jets. We will not be able to sell our homes as the value of them will go way down. Here is what Gemini AI said when I searched. I am printing this out and will pass it out to everyone I can reach in hopes of stopping this.</p> <p>Question to Gemini AI on Google Chrome: "What's the difference between the noise level of an F-15 and the noise level of F-35A?"</p> <p>Gemini said</p> <p>The difference in noise levels between the F-15 Eagle and the F-35A Lightning II is significant, with the F-35A generally being considerably louder, particularly during landing and certain takeoff conditions.</p> <p>While both are high-performance fighter jets, the F-35A's single, massive F135 engine produces significantly more thrust (and thus more noise) than the twin, but older,</p> | Thank you for your comment. Section 3.2, Noise, of the EIS and the Final Noise Study Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base, Klamath Falls, Oregon, April 2026 (Final Noise Study [DAF 2026]) evaluate aircraft noise associated with the Proposed Action, including the change from F-15C/D to F-35A operations. The EIS acknowledges that the F-35A has a different acoustic profile than the F-15C/D; however, community noise exposure depends on several factors, including aircraft type, power setting, altitude, flight track, climb profile, runway use, and distance from the receptor. As shown in Figure 3.2-6, the modeled change in DNL compared to the No Action |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------|-------------------|------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                   |                  |                     | <p>F100 engines found in most F-15 variants.<br/>Decibel Comparison<br/>In acoustics, a 10 dB increase is typically perceived by the human ear as twice as loud. By this standard, the F-35A is often perceived as twice (or more) as loud as an F-15.<br/>Phase of Flight F-15 Eagle F-35A Lightning II Difference<br/>Landing Approach ~91 dB ~105–106 dB +14–15 dB<br/>Takeoff (Military Power) ~112 dB* ~121 dB +9 dB<br/>Note: Takeoff decibels vary based on the specific F-15 engine model (PW-220 vs. PW-229). The F-35A is consistently reported as roughly 9 dB louder than the F-15 on takeoff.</p> <hr/> <p>Key Factors for the Difference</p> <ul style="list-style-type: none"> <li>• Engine Thrust: The F-35's F135 engine is in the 40,000 lb thrust class, making it the most powerful fighter engine in the world. In contrast, the F-15's dual engines each produce roughly 23,000 to 29,000 lbs of thrust. More thrust generally correlates with higher noise levels.</li> <li>• Low-Frequency Noise: The F-35A produces a distinct, low-frequency "rumble" that carries further and vibrates structures more than the higher-pitched "whine" or "scream" of older legacy fighters like the F-15 or F-16.</li> <li>• Operational Altitude: During landing, the F-35A has been measured at 105–106 dB at 500 feet, which is significantly higher than the 91 dB average for the F-15 at similar distances.</li> </ul> <p>Community Impact:<br/>The noise difference has been a major point of discussion for communities near Air Force bases (such as Eglin AFB or Burlington ANGB). Because the F-35A is perceived as roughly twice as loud as the aircraft it often replaces, environmental impact studies have had to redraw "noise contours" to account for the larger area affected by high decibel levels.</p> | <p>Alternative would vary by location across Klamath Falls. The EIS identifies significant noise effects around LMT/Kingsley Field ANGB under the Proposed Action due to the increased number of people exposed to aircraft noise. The evaluation in the Final EIS does not predict changes to individual property values or whether specific homeowners may choose to relocate. However, the effects of aircraft noise were evaluated and disclosed in Section 3.2 of the Final EIS and the Final Noise Study (DAF 2026).</p> |



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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i>                     | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <i>Response</i>             |
|------------------|-------------------|------------------|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                  |                   |                  |                                         | Sincerely, Gary & Vianne Pederson<br>4441 Southside Expressway, Klamath Falls, 97603                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                             |
| 9                | Scott             | Siracusa         |                                         | I am writing in favor of Kingsley Field as the F35 training base. The base and its staff (both military and civilian) are a significant component of our community (both financially and as community members). As citizens of Klamath Falls, the sound of jets training has become as much a part of our community as the people who live here.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Thank you for your comment. |
| 10               | Richard           | Pfeil            | First Presbyterian Church Klamath Falls | <p>Our community is super excited over the prospects of being a F-35 training site. The community has embraced Kingsley Field despite the noise created by the jets. It is a cost we are willing to bear to support the base and our community. Kingsley is an ideal location. The runways are long. The base is in good order. The annual airshows bring out 24,000 visitors, which is an indicator of how supportive the community is of the base. Plus, this smalltown needs it. We've lost so much due to EPA regulations and radical environmental restrictions costing the community its mills and the forestry industry. We lost Geld-Wen, a large door and window company. We are making a comeback. And the F-35 is part of that.</p> <p>Plus being a small town that is conservative and supporting of the military and law enforcement, creates a safe haven for families. It's a good community for the raising of children. The opportunity for healthy outdoor activities is incredible. We have boating, sailing, fishing, kayaking, tennis, pickleball, hiking, camping, golf. The area features an Arnold Palmer designed gold course that is the best in the state. And it's affordable. The Running Y is a resort. A great place for a respite. And fantastic community for those who can afford it. We have housing from the mid-200's to \$1 million with lots of options in between. The community includes lots of amenities: trails, a sports center, basketball court, indoor pool, sauna, hot tub, game room, weight room, classes,</p> | Thank you for your comment. |

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|------------------|-------------------|------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
|                  |                   |                  |                     | <p>pickleball courts, golf, and several nice restaurants. The scenery is amazing and the people are quiet and maintain their property very well. It has standards that most areas in Klamath do not. And property values go up. So it's a good long-term investment. We are a growing community, so we are attracting new businesses. Lately WinCo. moved in lowering the cost of food. The cost of living is low. We don't have a lot of places to shop but most people I know of do their shopping via Amazon. And what they can't get there they can find at Walmart, TJ Max, Rosses, Coastal, or Bi-Mart. All these stores are very affordable and fit a airmen's wage. The Running Y fits the wage of career airmen and their leaders.</p> <p>We also have some big employers who are always looking for qualified workers. Amazon is expanding their Warehouse facility. Sky Lakes is a very nice hospital. I was surprised that a smalltown actually had as fine of a hospital as Sky Lakes. WinCo. is also a great place to work and is employee friendly.</p> <p>The area is also culturally rich. I was amazed by the talent in the area but also the Ross Ragland theater and the incredible acts they are able to bring in. I lived in Southern California and the acts they draw here are just as good as the ones I saw in CA.</p> <p>The downtown area a quaint and nostalgic. It too is seeing a renewal. When I came 7 years ago half of the shops were abandoned. Today we have 3-4 that are closed but they are well maintained. The downtown also features lots of events like the Kar Kruise, Third Thursday, Farmers Market, CityFest which will be Saturday May 30th. It's a free family oriented fair that brings everyone together paid for by the churches and businessowners who love their community and want to see it thrive and become united in love and service.</p> |                 |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i>                                                                | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <i>Response</i>             |
|------------------|-------------------|------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                  |                   |                  |                                                                                    | <p>So Kingsley is an ideal spot for the training of F-35 pilots and Klamath Falls is an ideal place for their families. And for those who are single, there is lots for them to do. We have a range of bars from blue collar to a high-end martini bar. Most offer evening entertainment on the weekends. We have a pool hall, gaming, and a new rock wall facility currently being built with stores and a new restaurant. Best of all, the scenery and the safety of the area is attractive for all. You won't get any of the craziness you see in the larger cities. And not too far from Klamath you have bigger cities with lots of shopping just 1.5 hours away. You have wineries and the Shakespeare festival in Ashland. 45 minutes away you have Lake of the Woods which has lots of boating, fishing and a weekly outdoor BBQ with entertainment - free. Two hours away we have Crater Lake, a marvel that people travel a long way to see. That's a must see! And that park has lots of annual events. So this is the place for the airmen to be!!!</p> |                             |
| 11               | Jeff              | Dakota           | Tribal Historic Preservation Agent for the Redding Rancheria in Redding California | <p>Good Morning Rocco de Gregory,</p> <p>My name is Dakota Jeff, Tribal Historic Preservation Agent for the Redding Rancheria in Redding California, I am reaching out in regards to a letter dated April 10, 2026 for the F-35A Lightning II Beddown project at Kingsley Field ANGB. As a Federally Recognized tribe we thank you for reaching out in regards to this project. At this time we would like to defer this project to the Klamath Tribes a group of Federally Recognized Tribes in the Klamath area. Again we thank you for reaching out and if there is anything else we can do to help with this project please let me know.</p> <p>Thank You and have a Great Day.</p>                                                                                                                                                                                                                                                                                                                                                                             | Thank you for your comment. |

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|                  |                   |                   |                                        | Dakota Jeff<br>Tribal Historic Preservation Agent<br>2000 Redding Rancheria Road<br>Redding, CA 96001<br>(530)225-8979 EXT. 1012<br>Dakota.Jeff@reddingrancheria-nsn.gov                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                             |
| 12               | David             | Beard             |                                        | Yes and yes! We fully support this project, for the defense of our country and the economy of our town. The FW has made significant contributions to our community, and I trust that will continue. We live right in the flight path, and we understand the noise level will increase, but their training and our security are worth it.                                                                                                                                                                                                                                                                                                                            | Thank you for your comment. |
| 13               | Catherine         | Brookshire-Herron | Klamath County CattleWomen             | On behalf of the Klamath County CattleWomen Association (KCCW), I am pleased to offer our strong support for the F-35A Formal Training Unit at Kingsley Field. Please see attached Support Letter.<br><br>Thank you,                                                                                                                                                                                                                                                                                                                                                                                                                                                | Thank you for your comment. |
| 14               | Mark              | Chapman           |                                        | I am writing in support of the F35A training program. I have lived in Keno and the Klamath Falls area for over 6 years now and the F15 program is a staple of the community. I occasionally see or hear them when I am in town, as well as from my house when they are flying in this direction. They are not a nuisance but a vital part of the city and community. I have lived near commercial airports in other cities such as San Jose, CA and Portland, OR, and the impact of those critical transportation hubs is much, much more noticeable, but still well worth it. Our military needs training and I think Klamath Falls is a great place to host them. | Thank you for your comment. |
| 15               | Monica            | Navarro           | Klamath Basin Behavioral Health (KBBH) | To Whom It May Concern,<br><br>I am writing to formally submit my support for the basing of the F-35A Formal Training Unit at Kingsley Field.<br><br>Kingsley Field is more than a military installation; it is a cornerstone of the Klamath Basin's identity and                                                                                                                                                                                                                                                                                                                                                                                                   | Thank you for your comment. |

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|                  |                   |                  |                             | economy. The proposed F-35A mission ensures that our local workforce remains engaged in high-level national service and that our community continues to thrive alongside the National Guard. I have reviewed the Draft Environmental Impact Statement and believe the long-term benefits of this basing are essential for both national security and local prosperity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 16               | Julie             | Kraan            | St. Pius X Catholic Church  | Yes, I proudly support the F35A aircraft to our Kingsley Field base.<br>God Bless America!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 17               | Gene              | Souza            | Klamath Irrigation District | <p>Public Comment Letter</p> <p>The Klamath Irrigation District (KID) appreciates the opportunity to provide public comment on the Draft Environmental Impact Statement (EIS) for the proposed basing of the F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base (ANGB). KID is a special government district operating under Oregon Revised Statute (ORS) 545, representing over 1,700 farming families and responsible for acquiring, maintaining, and delivering water for beneficial use within the Klamath Project. Our infrastructure includes approximately 200 miles of irrigation ditches and 200 miles of drainage ditches in Klamath County.</p> <p>KID strongly supports the mission of the 173rd Fighter Wing and values its presence in the Klamath Basin; however, we have identified three areas within the Draft EIS that require clarification, additional analysis, or formal mitigation commitments to ensure the protection of our agricultural water supply, drainage infrastructure, and the farming communities we serve.</p> <p>1. Stormwater Drainage and Infrastructure Capacity<br/>Section 3.14.1.3 of the Draft EIS acknowledges that “Stormwater from the base drains to Klamath Irrigation District ditches and is then discharged to the Lost River,</p> | <p>Thank you for your comment. Regarding stormwater drainage and infrastructure capacity, Section 3.14.2.2 has been revised to clarify that, for stormwater management features that would connect to or discharge through infrastructure owned or managed by others, including KID drainage facilities, the DAF would coordinate, as appropriate, during final design to identify applicable drainage connections, design requirements, and infrastructure constraints. Stormwater design calculations and supporting analyses would be completed during final design and permitting, as required by applicable stormwater requirements.</p> <p>Regarding water quality and PFAS, Section 3.11.2.2 has been revised to clarify that construction dewatering, if required, would be managed in accordance with applicable federal, state, local, and DAF requirements, including Oregon DEQ permitting or approval requirements, as applicable. If discharge to a stormwater conveyance or drainage system that could enter KID-managed facilities is proposed, the DAF would coordinate, as appropriate, with KID and applicable regulatory agencies prior to</p> |

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|                  |                   |                  |                     | <p>about 2 miles southeast of LMT.” The Proposed Action involves ground-disturbing activities covering up to 933,050 square feet and the creation of 704,900 square feet of new impervious surfaces. While the EIS states that Low Impact Development (LID) measures will be implemented to attenuate surface water runoff, the document lacks specific engineering details or commitments regarding coordination with KID. Given that our infrastructure is over 100 years old and operates under specific capacity constraints, any failure or inadequacy in the proposed stormwater management systems could lead to increased flows, erosion, or sedimentation within KID-managed canals.</p> <p>Request: KID requests that the Final EIS include a formal commitment to consult with KID during the design phase of any stormwater management features that discharge into our system. We also request a detailed hydrologic analysis demonstrating that peak flow rates into KID ditches will not exceed existing conditions during storm events.</p> <p>2. Water Quality and PFAS Contamination Risks KID has been an active participant in the Kingsley Field Working Group addressing polyfluoroalkyl substances (PFAS) contamination on the base. We note that the Draft EIS (Section 3.11) identifies multiple Areas of Interest (AOIs) with confirmed PFOS/PFOA contamination that overlap with the footprints of 20 proposed construction projects. Of particular concern is the South Outfall (AOI 8), which the EIS states may have received AFFF releases and discharges into the drainage basin. Section 3.11.2.2 indicates that dewatering activities during construction will be tested for PFAS and treated if thresholds are exceeded. However, the EIS does not specify where the treated or untreated dewatering effluent will be discharged. Because base stormwater ultimately</p> | <p>discharge. Section 3.11.2.2 has also been revised to clarify that the Contaminated Media Management Plan, stormwater pollution prevention requirements, and applicable permits or approvals would include construction-phase procedures to reduce the potential for contaminated soil, sediment, groundwater, or other media to enter stormwater systems or downstream drainage infrastructure.</p> <p>Regarding future consultation and notifications, KID will be added to the distribution list for future NEPA notifications associated with this EIS, including the Final EIS and Record of Decision. Coordination during later design or construction planning would occur as appropriate based on final project design, drainage connections, permitting requirements, and affected infrastructure.</p> |

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|                  |                   |                  |                     | <p>reaches the EPA-impaired Lost River via KID ditches, any mobilization of PFAS poses a severe risk to agricultural water quality and the broader ecosystem.</p> <p>Request: KID requests that the Final EIS explicitly state that no construction dewatering effluent—treated or untreated—will be discharged into KID drainage ditches without prior notification, testing results review, and explicit consent from the District. Furthermore, we request that the Contaminated Media Management Plan include specific protocols for preventing the mobilization of PFAS-contaminated soils into the stormwater system during construction.</p> <p>3. Procedural Omissions and Future Consultation We noted that while other local and federal water management agencies were included on the scoping distribution list (Appendix B), the Klamath Irrigation District was omitted. Given the direct hydrological connection between Kingsley Field’s stormwater outfalls and KID’s drainage infrastructure, KID is a critical stakeholder in this process.</p> <p>Request: KID requests to be formally added to the distribution list for the Final EIS, the Record of Decision, and any subsequent environmental or construction planning documents related to this action.</p> <p>Thank you for your attention to these critical matters. We look forward to continuing our strong partnership with Kingsley Field while safeguarding the water resources and infrastructure essential to the Klamath Basin’s agricultural economy.</p> |                             |
| 18               | Carol             | mick             |                     | <p>We are in support of the F-35A Training Unit coming to Kingsley Field, Klamath Falls, Oregon</p> <p>Carol &amp; Bob Mick<br/>4002 El Cerrito Way</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Thank you for your comment. |



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|                  |                   |                  |                     | Klamath Falls OR 97603                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                              |
| 19               | Rose              | Varnum           |                     | I have attached my letter of support for the proposed F35A pilot training program<br>Rose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Thank you for your comments. |
| 20               | Joseph            | McBride          |                     | My name is Joseph S. McBride and I am in support of F35 aircraft being stationed at Kingsley Field. I am familiar with an Environmental Impact Statement (EIS) as I have earned a Bachelor's degree in Environmental Health and worked in the environmental field for 30 years. This area of Klamath Falls has been a military base for aircraft since 1942. East of the base is an incredible open air space where pilots can train that is just minutes from the airbase. Klamath Falls has a history of supporting our military and that has continued with our airbase. It is a vital portion of our economy and I see no reason that this EIS would not support their mission.                                                                                                                                                                                                                                                                                                                                                       | Thank you for your comment.  |
| 21               | Ralph             | Eccles           |                     | <p>The plan to make Kingsley Field (LMT) a training base for the F-35A Lightning H makes excellent sense. The base is currently used almost daily by various military aircraft stationed in California due to the good weather, long run way and minimal air traffic. This is ideal for training new pilots in new aircraft. Expanding the use of the base will make it not only a better place for these training aircraft, but also an excellent base for the training of pilots in the F-35A. There is nearby to large military air spaces for training.</p> <p>The cost of upgrading and maintaining an air base in Klamath Falls is much less expensive to the DOD than other locations. Also, the community is very supportive of the military and helped welcome and assist the pilots who trained here on the F-15. The community is so supportive and such an ideal place to live, that two former base commanders remain here as active community leaders.</p> <p>The base will be in the Henley High School district which</p> | Thank you for your comments. |

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|                  |                   |                  |                       | <p>has gotten numerous awards for excellence, offering both AP classes and trade classes with certification as well as an advanced Ag program. Near the base is the excellent Klamath Community College and by the training hospital is the polytechnic university of the Pacific Northwest- Oregon Technical Institute, which offers degrees in engineering, accounting and health care that result in the highest starting salaries for graduate of any university in the Pacific Northwest and among the top nationally.</p> <p>Sincerely,</p> <p>Ralph Eccles, DO<br/>Klamath Falls, Oregon<br/>retired faculty at Oregon Health &amp; Sciences University, rural branch<br/>(The associate dean of OHSU is in Klamath Falls, so there is excellent health care, including OB here).</p>                                                                                                                            |                             |
| 22               | Jennifer          | Fairfield        | Fairfield Realty, LLC | <p>I am writing in strong support of the proposal by the National Guard Bureau and Department of the Air Force to beddown and operate one F-35A Lightning II formal training unit squadron at Kingsley Field Air National Guard Base in Klamath Falls, Oregon.</p> <p>I submit this comment as an individual resident and business owner in Klamath Falls, not on behalf of any organization, board, association, or entity with which I may be affiliated.</p> <p>My background gives me a broad view of how deeply Kingsley Field is woven into the strength and stability of our local community. I own a real estate brokerage in Klamath Falls, am licensed in the State of Oregon, and work closely with buyers, sellers, property owners, investors, small businesses, and families throughout our region. I also serve in several community and civic roles, including work connected to housing, land use,</p> | Thank you for your comment. |

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|                  |                   |                  |                     | <p>construction, economic development, and local planning. Through that lens, I see firsthand how important long-term, stable employers are to Klamath County’s future.</p> <p>Kingsley Field and the 173rd Fighter Wing are not just military assets; they are part of the backbone of this community. The base supports good jobs, strengthens our local economy, brings skilled professionals and families to the area, and contributes to a sense of civic pride that is hard to measure but easy to feel. In a rural community like ours, losing or weakening that mission would have real consequences. Continuing and modernizing the mission at Kingsley Field matters.</p> <p>The transition from the retired F-15C/D aircraft to the F-35A reflects the reality that national defense needs are changing. If the Air Force needs expanded F-35A pilot training capacity, Kingsley Field is a proven and logical place to do that work. The 173rd Fighter Wing has a long-standing training mission, an experienced workforce, and a community that understands and supports the importance of military readiness. Training pilots to operate safely and effectively in modern combat aircraft is not optional; it is a national security necessity.</p> <p>I also recognize that any project of this size comes with impacts that deserve thoughtful review, including noise, infrastructure, environmental considerations, housing pressure, and community compatibility. Those concerns should be taken seriously and addressed responsibly through the EIS process. Support for this project does not mean ignoring local impacts. It means weighing them honestly against the long-term benefit to our community, our state, and our country.</p> <p>From my perspective, the proposed F-35A formal training unit would help preserve Kingsley Field’s role as</p> |                 |

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|                  |                   |                  |                     | <p>a vital military installation, support the continued relevance of the 173rd Fighter Wing, and provide economic stability for Klamath Falls and the surrounding region. It would also ensure that our community continues contributing in a meaningful way to the defense of the United States.</p> <p>For those reasons, I respectfully urge the National Guard Bureau and Department of the Air Force to move forward with the Proposed Action to beddown and operate the F-35A formal training unit squadron at Kingsley Field Air National Guard Base.</p> <p>Sincerely,<br/>Jennifer Fairfield<br/>Klamath Falls, Oregon</p>                                                                                                                                                                                         |                             |
| 23               | Joe               | Spendolini       |                     | <p>Joe Spendolini<br/>April 30, 2026</p> <p>To Whom It May Concern,</p> <p>As a business leader in the Klamath Basin, I am writing to express strong support for locating the F-35A training mission at Kingsley Field.</p> <p>For decades, the F-15 mission at Kingsley Field played a critical role in both national defense and our local economy. It also established something equally important—an operational standard. The personnel, systems, and training environment built around that mission consistently delivered results. That legacy should not be allowed to fade when there is a clear opportunity to build upon it.</p> <p>From a business perspective, continuity matters. Kingsley Field is not starting from zero—it is a proven, high-performing training installation with the infrastructure,</p> | Thank you for your comment. |

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|                  |                   |                  |                     | <p>airspace, and experienced workforce already in place. Transitioning to the F-35A is a logical next step that protects prior investment while advancing national priorities.</p> <p>There is also a practical workforce reality at play. The demand for highly trained F-35 pilots is increasing, and expanding training capacity in a location that already understands how to deliver at scale is simply a sound decision. Kingsley Field offers that capability today—not years from now.</p> <p>Locally, the base is the second-largest employer in our region and a foundational part of our economic stability. The impact extends well beyond the installation itself, supporting small businesses, housing, and the broader economic ecosystem across Klamath County. A successful transition to the F-35A mission would provide long-term certainty for employers, employees, and families who rely on that stability.</p> <p>Just as important, this is a community that understands and supports its military mission. That support is consistent, visible, and enduring. It is reflected in the partnerships between the base and the business community, and in the shared commitment to ensuring Kingsley Field remains a place where missions succeed.</p> <p>In business, we talk often about investing in what works. Kingsley Field works. It has the track record, the people, and the community backing to take on the F-35A mission and deliver results immediately.</p> <p>I strongly support and applaud the decision to transition Kingsley Field from the highly successful F-15 mission to the F-35A, securing its role as a premier training installation and positioning both the installation and our</p> |                 |

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|                  |                   |                  |                            | <p>nation for continued strength, readiness, and success.</p> <p>Sincerely,<br/>Joe Spendolini</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                              |
| 24               | Robert            | Kingzett         |                            | <p>The proposed Kingsley Field F-35A Lightening II Formal training unit should receive your full approval for implementation in August of 2027.</p> <p>Not all American communities these days are fully supportive of having military units in their local. Klamath Falls is strongly supportive of our Kingsley base which has been here since 1957. We have had three principle types of jet aircraft including the F-4 Phantom in the 1980's, the F-16 in the 1990's and the F-15 from 1998 through 2025.</p> <p>Kingsley provides about 1,100 excellent jobs for our community and has a direct economic impact well over \$100-million/yr.</p> <p>The F-35's are the next generation fighters for the US and assuming a need for them continuing into the future, they could well be used beyond mid-century.</p> <p>Kingsley is also the perfect place for the F35 squadron because we have a lightly travelled air space in our neighborhood and our established system of runways are long and very adequate.</p> <p>In summation, there is no better place in the country for this F-35 squadron and I fully support them being positioned at Kingsley Field</p> <p>Bob Kingzett</p> | Thank you for your comments. |
| 25               | Tom               | Schiess          | Klamath County Rotary Club | <p>I'm in complete and full support of the F-35 training mission coming to Kingsley Field in Klamath Falls Oregon. Kingsley has tremendous support from</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Thank you for your comment.  |

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|                  |                   |                  |                             | The community. Outstanding airspace to support the F-35 training mission. Additionally, Kingsley has excellent support from the Klamath Falls Airport. The airport has numerous instrument approaches and a 10,300 foot runway. Please move forward with this F-35 training mission at Kingsley Field.                                                                                                                                                                                                                                                  |                             |
| 26               | Kirth             | Glick            | Retired                     | Kingsley Field and the Airman that support the base are an important part of our community's I've lived the and work for the majority of my 80 years in Klamath Falls. As Marine and Vietnam Veteran, I know how important our freedom is appreciated. For those who serve our USA.                                                                                                                                                                                                                                                                     | Thank you for your comment. |
| 27               | Steven            | Roberson         | Klamath County Rotary Club  | As a having grown up in Klamath and one of the future President's of the Klamath County Rotary, I fully support moving forward with the EIS for the F35 A Lightning II aircraft. Klamath has always supported our Base and look forward to the arrival of the new fleet.                                                                                                                                                                                                                                                                                | Thank you for your comment. |
| 28               | Bernard           | Simonsen         | Crosspoint Christian School | I am strongly in support of the siting of the F-35 at Kingsley Field as represented in the EIS. As a volunteer at Crosspoint Christian School, which is near the flight path of the airfield I am inspired by the actions of the ANG and their support for the community and the school and in favor of expanding their mission.                                                                                                                                                                                                                        | Thank you for your comment. |
| 29               | Ralph             | Eccles           |                             | I fully support the development of Kingsley Field for the training of F-35A pilots                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Thank you for your comment. |
| 30               | Emily             | Bitalac          | U.S. EPA - NEPA Section     | Dear Alicia Treece:<br>The U.S. Environmental Protection Agency has reviewed the Department of the Air Force's April 2026 Draft Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base,1 in accordance with Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA. Pursuant to CAA Section 309, the EPA is required to review and comment publicly on any proposed federal action subject to Section 102(2)(C) of the National Environmental Policy Act. | Thank you for your comment. |



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Final – September 2026*

| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i>                                                          | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <i>Response</i>             |
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|                  |                   |                  |                                                                              | <p>The DEIS evaluates the effects of the proposed beddown, operation, and construction of associated infrastructure for one formal training unit squadron of F-35A Lightning II aircraft. The Crater Lake-Klamath Regional Airport/Kingsley Field ANGB is located within a designated moderate nonattainment area for the 24-hour PM2.5 (2006) NAAQS, noting that there is a proposed rule to redesignate the area to attainment and maintenance plan. The EPA appreciates the additional coordination regarding general conformity and does not have additional comments at this time.</p> <p>Thank you for the opportunity to review the DEIS for this project. If you have questions about this review, please contact Ariana Monroy of my staff at 206-553-2120 or at <a href="mailto:monroy.ariana@epa.gov">monroy.ariana@epa.gov</a>, or me, at 206-553-2581 or at <a href="mailto:bitlac.emily@epa.gov">bitlac.emily@epa.gov</a>.</p>          |                             |
| 31               | Nicole            | McDougal         | Executive Administrative Assistant - City of Klamath Falls<br>Mayor Westfall | <p>On behalf of the City of Klamath Falls, I am writing to express our strong support for the proposed basing of the F-3 SA Lightning II Formal Training Unit at Kingsley Field Air National Guard Base.</p> <p>Klamath Falls has a long and proud history of supporting military aviation and national defense. Kingsley Field has served as a critical training location for decades, and our community has grown alongside that mission. Generations of local residents have been inspired by the presence of Air Force aircraft overhead-sparking interest in military service, aviation careers, and public service. That legacy continues today and represents a unique and invaluable asset that cannot be easily replicated elsewhere.</p> <p>From a strategic standpoint, Kingsley Field is exceptionally well positioned. Its location between major West Coast military installations allows it to function as a key regional training</p> | Thank you for your comment. |

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|                  |                   |                  |                     | <p>hub, supporting efficient access to established military training airspace and ranges. The existing infrastructure, compatible airspace, and long-standing operational history make it an ideal site for advanced pilot training. The proposed F-35A Formal Training Unit directly supports national defense priorities by increasing pilot training capacity and ensuring readiness for next-generation aircraft. Kingsley Field is uniquely suited to meet this need, offering both the physical infrastructure and operational environment necessary to support this mission effectively.</p> <p>Equally important is the strong and enduring partnership between Kingsley Field and the Klamath Falls community. The City owns and operates the Crater Lake-Klamath Regional Airport and has a demonstrated history of working collaboratively with military partners to support mission success. This partnership ensures that infrastructure improvements, land use planning, and community coordination are aligned to support long-term operational viability.</p> <p>The community's support for Kingsley Field is unwavering. Residents understand the importance of the mission-not only for national security, but also for the economic stability and identity of our region. The proposed project would bring additional economic activity and jobs, further strengthening the local economy while maintaining our longstanding commitment to supporting military personnel and their families.</p> <p>Klamath Falls offers a combination of strategic location, established infrastructure, compatible airspace, and strong community backing that is difficult to match. Just as</p> |                 |

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|                  |                   |                  |                               | importantly, it offers something less tangible but equally critical: a culture that values and supports military service, built over generations of shared experience with Air Force operations.<br>For these reasons, we strongly support the selection of Kingsley Field Air National Guard Base as the home of the F-35A Formal Training Unit.                                                                                                                                      |                              |
| 32               | Whit              | Simpson          | Rotary Club of Klamath County | I am in support of the F35 project in order to maintain our safety and community.                                                                                                                                                                                                                                                                                                                                                                                                      | Thank you for your comment.  |
| 33               | Pete              | Belcastro        | Ginos on East Main            | I live near Kingsley Field on a small farm. I enjoy watching the planes fly from Kingsley Field and I totally support the Air Force plan to bring F-35's to Kingsley Field. Our community supports the mission and the people who make it happen.<br>Klamath Falls has been an amazing city in support of our military over many decades. This F-35 mission will continue that tradition and our community is ready for it to happen again Bring the F-35 to Kingsley Field. Thank you | Thank you for your comments. |
| 34               | Cody              | Anderson         |                               | Having moved into the community soon to be at three years, my wife and I have never experienced anything like the roar of the jets of Kingsley Field and we absolutely love the sound. The sound is the heritage of the community. I hope we can continue celebrating this sound with the bringing in of the F-35's.                                                                                                                                                                   | Thank you for your comment.  |
| 35               | Christopher       | Metler           |                               | I fully support the mission of Kingsley Field and the conversion to the F-35. Can wait to see them flying around our town with the Kingsley tail flash!                                                                                                                                                                                                                                                                                                                                | Thank you for your comment.  |
| 36               | Linda             | McBride          |                               | I am very excited to see the future of Kingsley Field continue with this next level of jets. Kingsley has been a vital part of the Klamath Basin for many years and I look forward to our community's continued partnership for many more years.                                                                                                                                                                                                                                       | Thank you for your comment.  |
| 37               | James W.          | Witt             | CMSgt (Retired)               | A great decision was made when the 173 Fighter Wing at Kingsley Field was announced as a Fighter Training Unit for the F-35. The 173FW has a long established history as                                                                                                                                                                                                                                                                                                               | Thank you for your comments. |

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|                  |                   |                  |                     | <p>an “FTU”. Always, have exceeded and provided the best product in all facets of student training. The flying environment is perfect for such a mission. Airspace is plentiful, weather cooperative, and the community embraces and loves the military and is supportive of the flying mission that has taken place at Kingsley Field in Klamath Falls, Oregon.</p> <p>Yes, I was fortunate to serve both militarily and as a civilian Defense Contractor for 31 years supporting the 173d Fighter Wing. It was an honor and a privilege to serve at the best military organization. I love what this community is all about and have remained in Klamath Falls in my retirement.</p> <p>Looking forward to the F-35 at Kingsley turning out the best pilots in the world.</p> <p>James W. Witt, CMSgt (Retired)</p>                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 38               | Don               | Mausshardt       | PE (Retired)        | <p>Dear Sirs:</p> <p>First of all, I want to thank you for the opportunity to review the EIS for the F-35 program at Kingsley ANG. The document was well written, and my review was confined to the section titled, Summary of Effects. My concern deals with the two sections on noise and infrastructure.</p> <p>- Noise: I was personally present when the planes (F-35s) took off on the runway heading over the town toward the north. The noise level was relatively brief and was similar to the F-15s.</p> <p>- Infrastructure: The none decision option was unclear. You plan on improving the space and structure and reference 331,600 sq feet and later state that the approval for the F-35 program included expanding the Infrastructure to 704,900 sq feet. The discrepancy is over two-fold. This is important to clarify because this impacts things like storm water management. I was unable to find</p> | <p>Thank you for your comment. The 331,600-square-foot figure refers to the building footprint of proposed facility construction, while the 704,900-square-foot figure represents the total new impervious surface associated with constructional ground-disturbing activities. Because total impervious surface area is the metric-based indicator for evaluating stormwater runoff, stormwater effects are evaluated using the 704,900-square-foot baseline. Stormwater management and runoff effects are addressed in Section 3.7, Water Resources, and stormwater infrastructure is addressed in Section 3.14, Infrastructure/Utilities.</p> |

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|                  |                   |                  |                                                                             | <p>the section addressing this issue.</p> <p>I was only able to review the documents for about 40 minutes before giving them back for the next reviewer. There may be other issues that I missed.</p> <p>Sincerely,</p> <p>Don Mausshardt, PE (ret)<br/>10909 SISKIN lane<br/>Klamath Falls, OR 97601<br/>Cell 541 331 1170</p>                                                                                                                                                                                                            |                                                                                                                                                                                                                                               |
| 39               | Kaitlin           | Hakanson         | Archaeologist,<br>Culture & Heritage<br>Department<br>The Klamath<br>Tribes | <p>Thanks for sending these materials and for the time and attention you provided to my concerns when you first reached out about this project.</p> <p>We have no comments or concerns to share about the potential adverse effect to the Kingsley Field Alert Hangar Historic District.</p> <p>Thank you,<br/>-Kaitlin</p> <p>Kaitlin Hakanson, MA RPA<br/>Archaeologist, Culture &amp; Heritage Department<br/>The Klamath Tribes</p> <p>Kaitlin.Hakanson@KlamathTribes.com<br/>Office: 541-783-2764 ext. 407<br/>Cell: 541-576-4030</p> | Thank you for your comment.                                                                                                                                                                                                                   |
| 40               | William           | Klein            |                                                                             | <p>Subject: NEPA Compliance Oversight – Kingsley Field DEIS</p> <p>Dear CEQ Staff,</p> <p>I am writing to bring to your attention a potential NEPA compliance issue regarding the DEIS. Despite diligent efforts, Appendix E is not publicly available. I request</p>                                                                                                                                                                                                                                                                      | Thank you for your comment. The project website was reviewed, and Appendix E is available on pages 328-329 of the “Kingsley Field F-35A Draft EIS” .pdf file provided for public review. The DAF is committed to maintaining public access to |

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|                  |                   |                  |                     | <p>CEQ oversight to ensure that the responsible agency is complying with NEPA’s public participation and administrative record requirements.</p> <p>Sincerely,</p> <p>Dr. William F Klein<br/>801 Lake View Drive<br/>wfk@hushmail.com<br/>530-382-7031<br/>May 8, 2026<br/>EIS Comment Submittal Attached</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>the EIS documents throughout the NEPA process and will address any reported website or document-access issues as they are identified.</p> |
| 41A              | Dr. William F.    | Klein            |                     | <p>Dr. William Francis Klein<br/>801 Lake View Drive<br/>wfk@hushmail.com<br/>530-382-7031<br/>May 8, 2026</p> <p>To: Air Force Civil Engineer FOIA/Environmental Office<br/>Cc: Council on Environmental Quality (CEQ) – info@ceq.eop.gov<br/>Kingsley Field Environmental Office</p> <p>Subject: Submission of DEIS Comments and FOIA Request – Kingsley Field, Oregon</p> <p>Dear Sir/Madam,<br/>Enclosed, please find my submission regarding the Draft Environmental Impact Statement (DEIS) for Kingsley Field, Oregon. This packet includes:</p> <ol style="list-style-type: none"> <li>1. My detailed comments on the DEIS</li> <li>2. FOIA request for Appendix E</li> <li>3. Optional CEQ oversight letter</li> </ol> <p>These materials are submitted to ensure that NEPA’s public participating and transparency requirements are fully met and that the administrative record is complete. Please confirm receipt at your earliest convenience.</p> | <p>Thank you for your comment. DAF received the comment package.</p>                                                                         |

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|                  |                   |                  |                     | Sincerely.<br>Dr. William Francis Klein                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 41B              |                   |                  |                     | <p>Page 2 – DEIS Comments</p> <p>1. Arbitrary Limitation of Project Impact Area<br/>The DEIS restricts the project impact area to the boundaries of the airport (LMT). This approach fails to account for impacts from flight operations outside the airport, including the significant increase in flight hours and aircraft noise.</p> <ul style="list-style-type: none"> <li>• Table S-1 indicates that annual sorties (average duration 1.3 hours) will increase from 3,360 to 4,615.</li> </ul> <p>Total F-35A airfield operations will increase from 13,440 to 20,780 annually, a 55% increase over existing F-15C/D operations (p. S-3).</p> <p>Despite this increase, the DEIS asserts there would be no environmental impact outside the LMT boundaries, contrary to NEPA and CEQA requirements. Arbitrarily limiting the scope ignores real impacts in surrounding MOAs, including South Goose, Juniper, Hart, and others listed in Table S-3.</p> <p>2. Noise Impacts</p> <ul style="list-style-type: none"> <li>• At California Pines (South Goose MOA, never environmentally cleared), 47 noise data files over 17 months indicate ground-level noise between 63.9 dB and 104 dB, with a mean of 78 dB.</li> <li>• Multiple aircraft overfly populated areas with dwell times averaging 14 minutes, sometimes exceeding 30 minutes.</li> <li>• A 55% increase in operations with louder F-35A aircraft will significantly increase noise exposure, a clear significant impact under NEPA and CEQA.</li> </ul> <p>3. Wildlife and Biological Impacts<br/>Deer, waterfowl, eagles, and hawks flee during low-altitude, high-noise operations.</p> <ul style="list-style-type: none"> <li>• DEIS claims of minimal wildlife impact contradict field observations and fail NEPA standards.</li> </ul> <p>4. Safety Concerns</p> | <p>Thank you for your comment. The geographic scope of analysis varies by resource area and is based on the type of potential environmental effect evaluated. Construction-related effects are evaluated where ground disturbance, demolition, renovation, or new infrastructure would occur. Operational effects are evaluated using the applicable resource-specific study area, including areas outside Kingsley Field ANGB/LMT where there is a reasonably foreseeable causal pathway for effects from the Proposed Action. Resources beneath the military training airspace are carried forward for detailed analysis where warranted by the proposed change in 173 FW operations.</p> <p>The Proposed Action would not establish or modify South Goose MOA or other military training airspace as a separate airspace action. The EIS evaluates the reasonably foreseeable change in 173 FW use of existing military training airspace associated with the Proposed Action, including projected use of the Goose MOAs, as applicable. Community observations and information submitted during the public comment period were considered and, where appropriate, used to inform revisions to the Final EIS. The noise analysis relies on accepted aircraft noise modeling methods and operational assumptions, including projected aircraft operations, aircraft type, flight profiles,</p> |



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|                  |                   |                  |                     | <ul style="list-style-type: none"> <li>• Residents report low-altitude aggressive maneuvers, including dogfighting and flare deployment, over California Pines and Donovan Reservoir at altitudes as low as 500 ft AGL.</li> <li>• DEIS statements regarding altitude (“majority above 20,000 ft MSL,” p. S-4) are non-enforceable.</li> </ul> <p>5. Regulatory and Procedural Violations</p> <ul style="list-style-type: none"> <li>• South Goose MOA never cleared under NEPA or CEQA.</li> <li>• Sections 3-1 and 3-2 inconsistently claim no significant impact while proposing a 55% increase in operations.</li> <li>• FAA dual role as environmental lead and enforcement authority is a conflict of interest.</li> <li>• Cumulative impacts not addressed (40 C.F.R. § 1508.7).</li> </ul> <p>6. Socioeconomic Impacts</p> <ul style="list-style-type: none"> <li>• Increased noise and unsafe maneuvers reduce property values and quality of life.</li> <li>• Community desirability is negatively impacted by increased flight operations.</li> </ul> <p>7. Transparency and Public Participation</p> <ul style="list-style-type: none"> <li>• Appendix E is not publicly available.</li> <li>• NEPA (40 C.F.R. § 1503.1) mandates all public comments be included in the administrative record. A FOIA request for Appendix E has been submitted.</li> </ul> <p>8. Requested Actions</p> <ol style="list-style-type: none"> <li>1. Expand project impact area to include all MOAs and flight ranges.</li> <li>2. Conduct full environmental analysis of South Goose MOA/TMOA.</li> <li>3. Incorporate community-collected noise and observation data.</li> <li>4. Implement enforceable altitude and flare restrictions.</li> <li>5. Address cumulative and indirect impacts.</li> <li>6. Ensure public access to Appendix E.</li> <li>7. Provide CEQ confirmation of NEPA compliance.</li> <li>9. Conclusion</li> </ol> <p>The DEIS fails to comply with NEPA and CEQA. The</p> | <p>altitude distribution, and use of existing military training airspace.</p> <p>F-35A operations under the Proposed Action would comply with applicable FAA regulations, DAF procedures, and local flight rules. Chaff and flare use would occur only where authorized and in accordance with applicable procedures, range/airspace restrictions, and safety limitations. The Oregon ANG would continue to implement applicable special procedures established in the 2017 Oregon Airspace EIS and ROD, including the minimum flare release altitude of 5,000 feet AGL for flares deployed in ANG-managed Oregon military training airspace.</p> <p>The EIS does not predict changes to individual property values; however, concerns regarding property value, community desirability, and quality of life are related to the aircraft noise effects evaluated in Section 3.2, Noise, and disclosed for consideration by the decision-maker. The Draft EIS, appendices, and supporting materials, including the Noise Study, were made available for public review on the project website.</p> <p>The legacy CEQ regulation cited in your comment, 40 CFR § 1508.7, has been rescinded and is not the operative standard for this EIS. The EIS considers reasonably foreseeable actions and environmental trends where relevant to understanding the affected environment and evaluating the</p> |

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|                  |                   |                  |                     | 55% increase in operations and louder aircraft represent significant impacts on human and natural environments. Supporting noise files, videos, and documentation are available.<br>Sincerely,<br>Dr. William Francis Klein                                                                                                                                                                                                                                                                                                                              | environmental effects of the Proposed Action. DAF is responsible for NEPA compliance for the Proposed Action. FAA is a cooperating agency on this EIS, and CEQA does not govern DAF's NEPA analysis for this federal action.                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 41C              |                   |                  |                     | Subject: NEPA Compliance Oversight – Kingsley Field DEIS<br>Dear CEQ Staff,<br><br>I am writing to bring to your attention a potential NEPA compliance issue regarding the DEIS. Despite diligent efforts, Appendix E is not publicly available. I request CEQ oversight to ensure that the responsible agency is complying with NEPA's public participation and administrative records requirement.<br>Sincerely,<br>Dr. William F. Francis<br>801 Lake View Drive<br>wfk@hushmail.com<br>530-382-7031<br>May 8, 2026<br>EIS Comment Submittal Attached | Thank you for your comment regarding NEPA compliance and public participation. The Department of the Air Force and National Guard Bureau are fully committed to the public involvement and administrative record requirements mandated by the Council on Environmental Quality (CEQ) regulations. Upon receipt of concerns regarding document accessibility, a technical audit of the public project website was conducted. Appendix E was verified as fully active, functional, and accessible for public download. The final administrative record will reflect complete public availability of all draft materials and appendices throughout the NEPA process. |
| 41D              |                   |                  |                     | Subject: FOIA Request – Appendix E, Kingsley Field DEIS<br><br>Dear FOIA Officer,<br><br>Pursuant to the Freedom of Information Act (5 U.S.C. § 552), I am requesting a copy of Appendix E from DEIS, which contains public comments. Please provide the document in PDF or other electronic format and notify me of any anticipated fees.<br><br>Sincerely,<br><br>Dr. William Francis Klein                                                                                                                                                            | Thank you for your comment. The project website was reviewed, and Appendix E is available on pages 328-329 of the "Kingsley Field F-35A Draft EIS" .pdf file provided for public review. The DAF is committed to maintaining public access to the EIS documents throughout the NEPA process and will address any reported website or document-access issues as they are identified.                                                                                                                                                                                                                                                                               |

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|                  |                   |                  |                                                                | 801 Lake View Drive<br>wfk@hushmail.com<br>530-382-7031<br>May 8, 2026<br>DEIS Comment Submittal Attached                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 42               | John              | Bair             | President and agriculture producer living in the Klamath Basin | <p>I'm responding to proposed action, Enviro-impact statement Basing F-35A Formal training unit at Kingsley Field, K Falls, Or.</p> <p>I stand totally against any deployment of F-35s at Kingsley Field.</p> <p>These aircraft, demonstrated to the residents of K Falls, 8 mos. ago or so how terrible loud this craft can be, besides being very dangerous to fly &amp; handle. noise and over our community.</p> <p>I'm a agriculture producer in the basin.</p> <p>My farm is located at the end of the runway. I and my family have farmed here for 100 yrs. We have provided stability and growth to our families, our community, state and country.</p> <p>On the day of the plane wreck I had a crew working to harvest a garlic crop. The noise and disruption was so bad that they walked out of my field. When I called the commander of the base was called to explain the noise &amp; terrible flight confusion at the facility.</p> <p>No response?</p> <p>This exercise resulted in a aircraft, stuck in the lost river diversion canal at the end of the runway. (Fortunately no one was hurt).</p> <p>The canal was drained to remove craft. Loss of irrigation water to local agriculture for a week?</p> <p>Jet fuel &amp; contaminates in irrigation water. Enviro impact?</p> <p>I and my neighbors spend all day out in the fields working.</p> <p>The noise daily is terrible, day in and day out.</p> <p>I've seen these planes land and take off quietly. This</p> | <p>Thank you for your comment. DAF recognizes your long-standing connection to the Klamath Basin and your family's multi-generational agricultural presence near Kingsley Field ANGB/LMT.</p> <p>Section 3.2, Noise, evaluates aircraft noise associated with existing and proposed operations at Kingsley Field ANGB/LMT, including effects on surrounding residential and agricultural areas. The EIS identifies significant noise effects around LMT/Kingsley Field ANGB under the Proposed Action due to the increased number of people exposed to aircraft noise.</p> <p>The 173 FW implements noise mitigation procedures when they can be accomplished safely; however, aircraft operations must continue to comply with flight safety, air traffic control, weather, aircraft performance, and mission requirements.</p> <p>The EIS does not establish operational noise limits, monthly noise reporting requirements, or a residential sound insulation program; however, aircraft noise effects are disclosed in Section 3.2, Noise, for consideration by the decision-maker.</p> <p>Section 3.10, Safety, evaluates aircraft safety, including accident potential zones and the Bird/Wildlife Aircraft Strike Hazard program. Wildlife management activities would continue to be conducted in</p> |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------|-------------------|------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                   |                  |                     | <p>should be protocol to fly in our beautiful basin.<br/>Noise should be monitored and reported to community on a monthly basis, limits should be in place and monitored daily.<br/>Noise proof our homes at the ends of the runway.<br/>Drive all the nails back in the roofs of my buildings over her.<br/>If the planes do come we expect the guard to work with our community. Not place a person at the end of runway with a gun killing our pelicans, eagles other wild life.<br/>Protect our farm land the way we do as producers.<br/>Not only do we produce the food for our country, but our daily presence on our land surrounding the site on base (1955 dump site on base)</p> <p>John Bair<br/>Resident and agriculture producer living in the Klamath Basin<br/>address: 4960 Lombardy Ln<br/>Klamath Falls.<br/>resident &amp; farmer for 77 yrs<br/>ph. 541-891-4140</p> | <p>accordance with applicable laws, permits, and safety procedures. Concerns regarding the prior aircraft mishap and potential effects to irrigation water are noted; however, the EIS evaluates the reasonably foreseeable effects of the Proposed Action and does not re-evaluate prior mishap response actions. Section 3.11, Hazardous Materials and Wastes, evaluates hazardous materials, contaminated sites, and construction-related procedures to reduce the potential for contaminated media to be disturbed or released during proposed construction.</p> |

**APPENDIX C3**  
**CULTURAL RESOURCES REVIEW PERIOD**

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## **1.0 SYNOPSIS OF PUBLIC COMMENTS ON REVISED SECTION 3.9 CULTURAL RESOURCES IN THE DRAFT EIS**

### **1.1 BACKGROUND AND SCOPE OF FOCUSED REVIEW**

Following continued consultation under Section 106 of the National Historic Preservation Act (NHPA), the Department of the Air Force (DAF) revised its determination of effect for certain historic architectural properties at Kingsley Field, resulting in a finding of “Adverse Effect.”

To ensure full transparency and regulatory compliance, the DAF published a Notice of Availability (NOA) and issued press releases inviting the public and agency stakeholders to participate in a special 10-day public review and comment period from August 21 to August 31, 2026. This public review period was focused exclusively on the updated analysis, findings, and mitigation measures within the revised Section 3.9 (Cultural Resources) of the Draft Environmental Impact Statement (EIS).

### **1.2 OPPORTUNITIES TO COMMENT**

The DAF provided multiple methods for the public, federally recognized tribes, and government agencies to submit comments on the revised Section 3.9, as summarized in Table 1.

**Table 1 Methods of Comment Submission**

| <b><i>Submission Method</i></b> | <b><i>Description and Distribution Details</i></b>                                                                                                                                |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mail or Email                   | The DAF invited interested parties to submit written comments via postal mail or email, as detailed in the NOA, agency coordination letters, project website, and press releases. |
| Project Website                 | Notifications directed stakeholders to the official project website, which hosted the revised Section 3.9 document and an online comment submission form.                         |

### **1.3 SUMMARY OF PUBLIC AND AGENCY COMMENTS**

During the special 10-day comment period, the DAF received a total of 26 comment submissions across public and agency stakeholders, as shown in Table 2.

**Table 2 Summary of Public and Agency Submissions**

| <b><i>Stakeholder Category</i></b> | <b><i>Number of Submissions</i></b> | <b><i>Entities / Identifiers</i></b>                    |
|------------------------------------|-------------------------------------|---------------------------------------------------------|
| Government / Economic Agencies     | 1                                   | Klamath County Economic Development Association (KCEDA) |
| General Public & Community Members | 25                                  | Individual public submissions (detailed in Table C.3-4) |
| Total Submissions                  | 26                                  |                                                         |



#### 1.4 CATEGORIZATION AND EVALUATION OF COMMENTS

In accordance with DAF and Department of War (DOW) NEPA Implementing Procedures, public comments were reviewed to determine whether they provided substantive input requiring modifications to the analysis, alternatives, or proposed mitigation.

- **Substantive Comments on Section 3.9:** Zero (0). No substantive comments were received that specifically questioned the methodologies, surveys, National Register of Historic Places (NRHP) eligibility determinations, adverse effect findings, or proposed cultural resources mitigation within the revised Section 3.9.
- **Non-Substantive and General Comments:** 20 submissions expressed general statements of support, opposition, or brief opinions without providing technical data or actionable environmental alternatives. Under standard NEPA procedures, these are acknowledged with a standard response.
- **Out-of-Scope Resource Inquiries:** 6 public submissions raised specific concerns regarding other environmental resource areas analyzed elsewhere in the comprehensive EIS. Although these topics were outside the defined scope of the Section 3.9 focused review, the DAF provided courtesy responsive explanations directing commenters to the appropriate sections of the Final EIS, as outlined in Table 3.

**Table 3 Out-of-Scope Comment Topics and Corresponding FEIS Sections**

| <i>Topic Raised</i>            | <i>Out-of-Scope Description</i>                                                         | <i>FEIS Section Reference</i>                                        |
|--------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| Aircraft Noise & Vibration     | Concerns regarding structural shaking, damage, and potential health effects             | Section 3.2 (Noise)                                                  |
| Operational Flight Tracks      | Requests to alter departure tracks or delay throttle application over residential areas | Chapter 2 (Description of Proposed Action and Alternatives)          |
| Aircraft Mission Alternatives  | Proposals to base alternative aircraft (such as F-15EX models) at Kingsley Field        | Section 1.3 (Purpose & Need) & Section 2.3 (Alternatives Eliminated) |
| Socioeconomic & Facility Costs | Inquiries regarding base construction expenditures and regional economic effects        | Section 3.5 (Socioeconomics)                                         |
| Environmental Contamination    | Inquiries regarding PFAS and ongoing site restoration                                   | Section 3.11.1.4 (Contaminated Sites / DERP)                         |

All public and agency submissions received during the 10-day review period are documented in full in Table 4 along with the DAF's corresponding responses.

**Table 4 Public Comments on the Revised Section 3.9 Cultural Resources**

| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i>                        | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                    | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                     |
|------------------|-------------------|------------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.               | Ryan              | Manfull          |                                            | I am in full support of whatever measures are deemed necessary to ensure the successful conversion into the F 35 platform. This transition will be highly beneficial to not only Kingsley Field, but also the local Klamath community. The success of Kingsley Field directly contributes to that of the Klamath Basin, and this conversion extends that relationship well into the future.                                                       | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                         |
| 2.               | Bernard           | Simonsen         |                                            | I have reviewed the EIS for the basing of the F-35A and as a resident of Klamath Falls and as a volunteer at Crosspoint Christian School in the Gatewood Community I strongly support the proposed project.                                                                                                                                                                                                                                       | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                         |
| 3.               | Scott             | Siracusa         | Running Y Resort                           | As one of two partner/owners of the Running Y Resort, we support the 173rd and the expansion of their mission. Our employees, guests, and locals overwhelmingly support the 173rd. Truthfully our community is positively impacted by the 173rd, its mission, and the men & women who serve and are our neighbors and closest friends.<br><br>In closing, as a community member and significant tax payer, I request full support of the mission. | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                         |
| 4.               | Del               | Fox              | Farmer retired USAF SMSGT, flight engineer | I firmly support F 35 operations at Kingsley Field jet noise is the sound of freedom.                                                                                                                                                                                                                                                                                                                                                             | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                         |
| 5.               | Melody            | Parsons          |                                            | I am worrying about the noise that comes from the jets. The F15's makes my house shake but if the F35 makes a stronger noise wave then I am afraid that things will break in my house, if so who is going to replace them? I am in the flight path off the airport runways.                                                                                                                                                                       | Thank you for your comment. Section 3.2 (Noise) of the Final EIS assesses aircraft noise and vibration, recognizing that low-frequency sound can cause noticeable window rattling and vibrations in nearby homes. While acoustic analyses show that F-35A flight profiles operate below the levels that cause structural damage, the Air Force maintains a formal claims process to |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------|-------------------|------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                   |                  |                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>review any property damage reported by community members.</p> <p>If property damage occurs as a result of flight operations, claims can be submitted through the 173 FW Legal Office (Office of the Staff Judge Advocate) via the installation's public inquiries portal at <a href="https://www.173fw.af.mil">https://www.173fw.af.mil</a> (or through the 173 FW Public Affairs Office), or filed online directly with the Air Force Claims Service Center at <a href="https://claims.jag.af.mil">https://claims.jag.af.mil</a>. Each claim is formally reviewed and investigated on a case-by-case basis under Department of the Air Force claims procedures.</p> |
| 6.               | Kathy             | Dillon           |                     | I am looking forward to the F35's. I miss listening to and watching the jets fly over our house. We are close to Kingsley Field and the noise doesn't bother us at all. Sound of FREEDOM.                                                                                                                                                                                                                                                                                                                                                                 | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 7.               | James             | Dean             |                     | I am in favor and excited that the 173rd FW, Kingsley Field will soon become a world class student training organization for the 5th generation aircraft with the introduction of the F-35 Lightning!<br>Fly, Fight, Win!!! Go Air Force                                                                                                                                                                                                                                                                                                                  | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 8.               | Christopher       | Moudry           |                     | I am a citizen of Klamath County since 1972 and feel that none of the buildings at Kingsley Field (#219, 325, or 400) have sufficient historical value. This is a military base and these buildings only go back only to the 1940's. No tribal sites have been found in the evaluation of this area and should not be considered. I believe that the updating of Kingsley Field to accommodate a appropriate training base for the F-35 Lightning aircraft is of great value to Klamath County and the country and should proceed. Thank you Chris Moudry | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i>                                     | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------|-------------------|------------------|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9.               | Phil              | Emerson          |                                                         | <p>Hello and thank you for letting me comment on the use of F35's in Klamath Falls. I live at the town end of the runway, I am easily 1000 ft from the planes taking off. According to google the F35 dB level is from 115 to 125. Above 85 dB's long term exposure causes hearing loss, at 115 dB's your ears are damaged in 15 to 30 seconds. When the F16's took off I could not talk to a person that was two feet from me and their dB level is less than the F35. I know it is all a part of training for them to get to about my house and then they point the plane straight up in the air and I have to run inside and cover my ears. There is a large portion of the city that gets this noise. I am 79 and most likely will have to get hearing aids from this noise. What worries me are the children who get blasted by the noise.</p> <p>I know those jets can fly slow, I watch them come into land and it is not bad, the same as using an aircraft carrier. Is there a chance the planes could fly further out from town, over the desert before they go into full throttle mode?</p> <p>Please try and keep the noise to a minimum over the town.</p> <p>Phil Emerson</p> | <p>Thank you for your comment. Potential noise impacts on public health, hearing, and sensitive receptors are evaluated in Section 3.2 (Noise) of the FEIS. Regarding flight tracks and power settings, aircraft departure and arrival procedures are governed by flight safety criteria, training profiles, and FAA regulations (Chapter 2). While the 173rd Fighter Wing adheres to established noise abatement procedures to the extent practicable, altering takeoff profiles or flight tracks as suggested is not feasible due to overriding safety and mission training requirements.</p> |
| 10.              | Randy             | Cox              | Klamath County Economic Development Association (KCEDA) | <p>On behalf of the Klamath County Economic Development Association (KCEDA), I am pleased to express our continued strong support for the proposed basing of the F-35A Formal Training Unit at Kingsley Field Air National Guard Base in Klamath Falls, Oregon.</p> <p>KCEDA appreciates the Department of the Air Force's continued commitment to a thorough, transparent environmental review process and the additional opportunity for public comment on the revised Section 3.9, Cultural Resources, of the Draft Environmental Impact Statement. We recognize the importance of protecting historic and cultural resources and support the Department's continued consultation under Section 106 of the National Historic Preservation Act..</p> <p>At the same time, we believe these cultural resource considerations can be responsibly addressed while allowing the</p>                                                                                                                                                                                                                                                                                                           | <p>Thank you for your comment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <i>Response</i> |
|------------------|-------------------|------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
|                  |                   |                  |                     | <p>F-35A basing proposal to move forward.</p> <p>Kingsley Field is an irreplaceable economic and strategic asset to Klamath County, Southern Oregon, the State of Oregon, and our nation. The 173rd Fighter Wing has a long and distinguished history of training the world's finest fighter pilots, and the transition from the F-15 to the F-35A represents the next generation of that mission.</p> <p>The F-35A Formal Training Unit would provide significant long-term benefits to our region, including:</p> <ul style="list-style-type: none"> <li>• Preserving and strengthening hundreds of military and civilian jobs associated with Kingsley Field and its supporting industries;</li> <li>• Protecting the substantial economic activity generated by the 173rd Fighter Wing throughout Klamath County and Southern Oregon;</li> <li>• Supporting local businesses, contractors, housing, education, healthcare, and other community services;</li> <li>• Providing opportunities for continued investment in infrastructure and workforce development;</li> <li>• Strengthening the long-term mission and operational relevance of Kingsley Field; and</li> <li>• Ensuring that Klamath Falls continues its proud role in supporting the readiness and national defense of the United States.</li> </ul> <p>The relationship between Kingsley Field and the Klamath Basin extends far beyond its economic impact. The men and women of the 173rd Fighter Wing are our neighbors, community leaders, volunteers, customers, students, and friends. Kingsley Field is woven into the fabric of Klamath County and has become an important part of our community's identity.</p> <p>Klamath County has demonstrated for decades that it is a community that supports the military and understands the importance of Kingsley Field's training mission. We believe the community is exceptionally well positioned to support the transition to the F-35A and the continued evolution of the 173rd Fighter Wing.</p> <p>KCEDA supports responsible stewardship of our region's cultural and historic resources. We also believe that preservation,</p> |                 |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------|-------------------|------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                   |                  |                     | <p>mitigation, economic opportunity, military readiness, and national security do not have to be competing objectives. Through continued consultation and thoughtful mitigation, these priorities can be appropriately balanced.</p> <p>For these reasons, KCEDA strongly supports the proposed basing of the F-35A Formal Training Unit at Kingsley Field and encourages the Department of the Air Force to move the project forward following completion of the environmental review and consultation process.</p> <p>Klamath County stands ready to welcome the F-35A and to continue our longstanding partnership with the 173rd Fighter Wing, the Oregon Air National Guard, and the United States Air Force.</p> <p>Respectfully,</p> <p>Randy Cox<br/>Executive Director/CEO<br/>Klamath County Economic Development Association (KCEDA)</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 11.              | Mike              | Jones            |                     | It is pointless to put that loud aircraft at this base. At least the last aircraft that was here wasn't loud. The aircraft fly too much over the town.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12.              | Jeff              | Hornsby          |                     | Didn't they find chemicals in the ground at the base? I believe it was PFAS. Tear down all the buildings and start fresh, all that contaminated land it probably leaching into our water system                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Thank you for your comment. Contamination management is conducted under the Defense Environmental Restoration Program (DERP) (FEIS Section 3.11.1.4, Contaminated Sites), which investigates and manages sites at Kingsley Field, including PFAS. All Proposed Action construction and demolition activities will strictly adhere to applicable regulations to safely manage contaminated materials and protect water resources. |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                                           | <i>Response</i>                                                                                                                                                                                                                                                                                                                             |
|------------------|-------------------|------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 13.              | No                | Name             |                     | The jets are loud and you bring more louder jets here???? Why would you train new pilots here? Aren't there like 10-15 other F-35 bases already? My vote would be to not bring them here                                 | Thank you for your comment.                                                                                                                                                                                                                                                                                                                 |
| 14.              | Concerned         | Resident         |                     | Missed the chance to answer last time. Wouldn't it make more sense to put a different f-15 unit here? The base already knows how to fly those. All these other states get f-15s and we get that hideous loud abomination | Thank you for your comment. The Purpose and Need of the Proposed Action is specifically to establish an F-35A FTU (FEIS Section 1.3). Basing F-15EXs was eliminated from detailed study (FEIS Section 2.3, Alternatives Considered but Eliminated from Detailed Analysis) because it does not meet the requirement to train F-35A aircrews. |
| 15.              | No                | Thankyou         |                     | The base has been spreading the word around town that they are getting these for years. At this point, I'd say it's much nicer in our small town without the noise here                                                  | Thank you for your comment.                                                                                                                                                                                                                                                                                                                 |
| 16.              | Smart             | Person           |                     | The base is contaminated, the hospital can't keep up with the amount of people here now. The plan is to bring more here to get sick? Wild!                                                                               | Thank you for your comment.                                                                                                                                                                                                                                                                                                                 |
| 17.              | Diehard           | American         |                     | Is there a way to get f-15s here instead, the e models or the brand new ones like Portland, would make more sense, since the guys out there already have experience doing that                                           | Thank you for your comment. The Purpose and Need of the Proposed Action is specifically to establish an F-35A FTU (FEIS Section 1.3). Basing F-15EXs was eliminated from detailed study (FEIS Section 2.3, Alternatives Considered but Eliminated from Detailed Analysis) because it does not meet the requirement to train F-35A aircrews. |
| 18.              | Oh                | Great            |                     | Loud annoying flyovers, worse than before...been dreading this for years                                                                                                                                                 | Thank you for your comment.                                                                                                                                                                                                                                                                                                                 |
| 19.              | Cultural          | Resources        |                     | If anyone really cared about the environment or the area, you wouldn't be bringing louder jets here                                                                                                                      | Thank you for your comment.                                                                                                                                                                                                                                                                                                                 |
| 20.              | Buddy             | Holley           |                     | How much is it costing tax payers to essentially make a whole new base here, could have just sent some of the new f15s here instead                                                                                      | Thank you for your comment. Section 3.5 (Socioeconomics) of the FEIS evaluates economic effects, noting that proposed construction                                                                                                                                                                                                          |



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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                                                                                                    | <i>Response</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------|-------------------|------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                   |                  |                     |                                                                                                                                                                                                   | activities will generate beneficial local economic activity and short-term employment (Section 3.5.2.2). The Proposed Action involves facility construction, renovation, and demolition within the existing installation footprint rather than establishing an entirely new base. Additionally, basing F-15EXs was eliminated from detailed study (Section 2.3) because it does not meet the Purpose and Need to establish an F-35A Formal Training Unit (FTU) (Section 1.3).                                        |
| 21.              | Concerned         | Citizen          |                     | Keep the old buildings, it's a waste of money to destroy and build new, it's the military, deal with it and stop wasting even more money                                                          | Thank you for your comment. As detailed in Chapters 1 and 2 of the Final EIS, existing Kingsley Field facilities were designed for legacy F-15 aircraft and cannot meet the physical dimensions, advanced avionics maintenance needs, or strict security standards essential for 5th-generation F-35A operations. Demolishing outdated structures to build purpose-built facilities is necessary to support the mission safely and is more cost-effective long-term than repeatedly retrofitting obsolete buildings. |
| 22.              | Aaaa              | Bbbb             |                     | They should tear down the old buildings...it will be funny when they have to spend millions to remove all the contaminated soil that's probably under there, like every other airport or base     | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 23.              | Build             | More             |                     | Build more buildings, to house more jets, to put more chemicals into our ground, water and sky                                                                                                    | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 24.              | Frederick         | French           | None                | I propose that the EIS move forward, I don't see any impacts to cultural and historical items that aren't already happening with the F15 mission and with that being said, aren't impacting those | Thank you for your comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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| <i>Comment #</i> | <i>First Name</i> | <i>Last Name</i> | <i>Organization</i> | <i>Comment</i>                                                                                                           | <i>Response</i>             |
|------------------|-------------------|------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                  |                   |                  |                     | resources and entities currently. I support the decision to base F35's at Kingsley Field.                                |                             |
| 25.              | Claudia           | Hardin           |                     | I am all for the training of pilots in the F35 at Kingsley. I have lived here all my life and like the sound of freedom. | Thank you for your comment. |
| 26.              | Evonna            | Cleven           | Self                | God bless all of you in Jesus Christ Amen 🙏🙏🙏                                                                            | Thank you for your comment. |

**APPENDIX D SPECIES OF CONCERN AT KINGSLEY FIELD  
AND UNDER THE ASSOCIATED AIRSPACE**

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**Table D-1 Federal and State Listed Species Potentially Occurring on Kingsley Field  
ANGB and Under the Military Training Airspace**

| <i>Common Name</i>                                         | <i>Scientific Name</i>                   | <i>Status</i> | <i>Potential Occurrence<br/>on Kingsley Field<br/>ANGB</i> | <i>Potential Occurrence<br/>Under the Airspace*</i> |
|------------------------------------------------------------|------------------------------------------|---------------|------------------------------------------------------------|-----------------------------------------------------|
| <b>Birds</b>                                               |                                          |               |                                                            |                                                     |
| Western snowy plover                                       | <i>Charadrius nivosus</i>                | ST, T         | -                                                          | P                                                   |
| Yellow-billed cuckoo                                       | <i>Coccyzus americanus</i>               | T             | P                                                          | P                                                   |
| Northern spotted owl                                       | <i>Strix occidentalis<br/>caurina</i>    | ST, T         | -                                                          | P                                                   |
| Hawaiian petrel                                            | <i>Pterodroma<br/>sandwichensis</i>      | E             | -                                                          | P                                                   |
| Marbled murrelet                                           | <i>Brachyramphus<br/>marmoratus</i>      | SE, T         | -                                                          | P                                                   |
| Short-tailed albatross                                     | <i>Phoebastria albatrus</i>              | SE, E         | -                                                          | P                                                   |
| <b>Fish</b>                                                |                                          |               |                                                            |                                                     |
| Shortnose sucker                                           | <i>Chasmistes<br/>brevirostris</i>       | SE, E         | P                                                          | P                                                   |
| Lost River sucker                                          | <i>Deltistes luxatus</i>                 | SE, E         | P                                                          | P                                                   |
| Bull trout                                                 | <i>Salvelinus confluentus</i>            | T             | -                                                          | P                                                   |
| Hutton Tui chub                                            | <i>Gila bicolor ssp.</i>                 | ST, T         | -                                                          | P                                                   |
| Tidewater goby                                             | <i>Eucyclogobius<br/>newberryi</i>       | E             | -                                                          | P                                                   |
| Warner sucker                                              | <i>Catostomus<br/>warnerensis</i>        | ST, T         | -                                                          | P                                                   |
| Desert dace                                                | <i>Eremichthys across</i>                | T             | -                                                          | P                                                   |
| Lahontan cutthroat trout                                   | <i>Oncorhynchus clarkia<br/>henshawi</i> | ST, T         | -                                                          | P                                                   |
| <b>Reptiles</b>                                            |                                          |               |                                                            |                                                     |
| Leatherback sea turtle                                     | <i>Dermochelys coriacea</i>              | SE, E         | -                                                          | P                                                   |
| Loggerhead sea turtle                                      | <i>Caretta caretta</i>                   | ST, E         | -                                                          | P                                                   |
| Northwestern pond<br>turtle                                | <i>Actinemys marmorata</i>               | PT            | -                                                          | P                                                   |
| Olive ridley sea turtle                                    | <i>Lepidochelys olivacea</i>             | ST, T         | -                                                          | P                                                   |
| <b>Mammals</b>                                             |                                          |               |                                                            |                                                     |
| Gray wolf                                                  | <i>Canis lupus</i>                       | E             | P                                                          | P                                                   |
| North American<br>wolverine                                | <i>Gulo gulo luscus</i>                  | ST, T         | P                                                          | P                                                   |
| Pacific marten<br>(Coastal Distinct<br>Population Segment) | <i>Martes caurina</i>                    | T             | -                                                          | P                                                   |
| <b>Snails</b>                                              |                                          |               |                                                            |                                                     |
| Bruneau hot springsnail                                    | <i>Pyrgulopsis<br/>bruneauensis</i>      | E             | -                                                          | P                                                   |
| <b>Insects</b>                                             |                                          |               |                                                            |                                                     |
| Monarch butterfly                                          | <i>Danaus plexippus</i>                  | C             | P                                                          | P                                                   |
| Franklin's bumble bee                                      | <i>Bombus franklini</i>                  | E             | -                                                          | P                                                   |
| Oregon silverspot<br>butterfly                             | <i>Speyeria zerene<br/>Hippolyta</i>     | T             | -                                                          | P                                                   |
| <b>Crustaceans</b>                                         |                                          |               |                                                            |                                                     |
| Conservancy fairy<br>shrimp                                | <i>Branchinecta<br/>conservatio</i>      | E             | -                                                          | P                                                   |

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| <b>Common Name</b>         | <b>Scientific Name</b>                             | <b>Status</b> | <b>Potential Occurrence<br/>on Kingsley Field<br/>ANGB</b> | <b>Potential Occurrence<br/>Under the Airspace*</b> |
|----------------------------|----------------------------------------------------|---------------|------------------------------------------------------------|-----------------------------------------------------|
| Shasta crayfish            | <i>Pacifastacus fortis</i>                         | E             | -                                                          | P                                                   |
| Vernal pool fairy shrimp   | <i>Branchinecta lynchi</i>                         | T             | -                                                          | P                                                   |
| Vernal pool tadpole shrimp | <i>Lepidurus packardii</i>                         | E             | -                                                          | P                                                   |
| <b>Plants</b>              |                                                    |               |                                                            |                                                     |
| Applegate's milk-vetch     | <i>Astragalus applegatei</i>                       | SE, E         | O                                                          |                                                     |
| Whitebark pine             | <i>Pinus albicaulis</i>                            | ST, T         | -                                                          | P                                                   |
| Cook's lomatium            | <i>Lomatium cookii</i>                             | SE, E         | -                                                          | P                                                   |
| Gentner's fritillary       | <i>Fritillaria gentneri</i>                        | SE, E         | -                                                          | P                                                   |
| Greene's tuctoria          | <i>Tuctoria greenei</i>                            | E             | -                                                          | P                                                   |
| Kincaid's lupine           | <i>Lupinus sulphureus</i><br>ssp. <i>kincaidii</i> | ST, T         | -                                                          | P                                                   |
| Lassics lupine             | <i>Lupinus constancei</i>                          | E             | -                                                          | P                                                   |
| McDonald's rock-cress      | <i>Arabis macdonaldiana</i>                        | SE, E         | -                                                          | P                                                   |
| Slender Orcutt grass       | <i>Orcuttia tenuis</i>                             | T             | -                                                          | P                                                   |
| Slickspot peppergrass      | <i>Lepidium papilliferum</i>                       | T             | -                                                          | P                                                   |
| Western lily               | <i>Lilium occidentale</i>                          | SE, E         | -                                                          | P                                                   |

**Legend:** ANGB = Air National Guard Base; E = Federally Endangered; T = Federally Threatened; C = Federal Candidate; PT = Proposed Federally Threatened; SE = State Endangered; ST = State Threatened; NA = Not applicable as plant and insect species under the airspace are not being analyzed; O = Observed; P=Potential.

**Source:** NGB 2023, 2024; ODFW 2024; Oregon Department of Agriculture 2024; USFWS 2024a, 2024b.

**Table D-2 Potentially Occurring Migratory Birds of Conservation Concern at Kingsley Field ANGB and Under the Military Training Airspace**

| <i>Common Name</i>        | <i>Scientific Name</i>               | <i>Potential Occurrence on the Installation</i> | <i>Potential Occurrence Under the Airspace</i> | <i>Seasonal Occurrence</i> |
|---------------------------|--------------------------------------|-------------------------------------------------|------------------------------------------------|----------------------------|
| Allen's hummingbird       | <i>Selasphorus sasin</i>             | -                                               | P                                              | Breeding                   |
| American avocet           | <i>Recurvirostra americana</i>       | P                                               | P                                              | Breeding                   |
| American white pelican    | <i>Pelecanus erythrorhynchos</i>     | P                                               | P                                              | Breeding                   |
| Ancient murrelet          | <i>Synthliboramphus antiquus</i>     | -                                               | P                                              | Year-round                 |
| Ashy storm-petrel         | <i>Hydrobates homochroa</i>          | -                                               | P                                              | Year-round                 |
| Bald eagle                | <i>Haliaeetus leucocephalus</i>      | P                                               | P                                              | Year-round                 |
| Black oystercatcher       | <i>Haematopus bachmani</i>           | -                                               | P                                              | Year-round                 |
| Black scoter              | <i>Melanitta nigra</i>               | -                                               | P                                              | Year-round                 |
| Black swift               | <i>Cypseloides niger</i>             | -                                               | P                                              | Breeding                   |
| Black tern                | <i>Chlidonias niger surinamensis</i> | P                                               | P                                              | Breeding                   |
| Black turnstone           | <i>Arenaria melanocephala</i>        | -                                               | P                                              | Year-round                 |
| Black-footed albatross    | <i>Phoebastria nigripes</i>          | -                                               | P                                              | Year-round                 |
| Black-legged kittiwake    | <i>Rissa tridactyla</i>              | -                                               | P                                              | Non-breeding               |
| Black-vented Shearwater   | <i>Puffinus opisthomelas</i>         | -                                               | P                                              | Year-round                 |
| Bobolink                  | <i>Dolichonyx oryzivorus</i>         | -                                               | P                                              | Breeding                   |
| Brandt's cormorant        | <i>Urile penicillatus</i>            | -                                               | P                                              | Year-round                 |
| Broad-tailed hummingbird  | <i>Selasphorus platycercus</i>       | -                                               | P                                              | Breeding                   |
| Brown pelican             | <i>Pelicanus occidentalis</i>        | -                                               | P                                              | Year-round                 |
| Buller's shearwater       | <i>Ardenna bulleri</i>               | -                                               | P                                              | Year-round                 |
| California gull           | <i>Larus californicus</i>            | P                                               | P                                              | Year-round                 |
| Calliope Hummingbird      | <i>Selasphorus calliope</i>          | -                                               | P                                              | Breeding                   |
| Cassin's auklet           | <i>Ptychoramphus aleuticus</i>       | -                                               | P                                              | Year-round                 |
| Cassin's finch            | <i>Haemorhous cassinii</i>           | -                                               | P                                              | Year-round                 |
| Chestnut-backed chickadee | <i>Poecile rufescens rufescens</i>   | -                                               | P                                              | Year-round                 |
| Clark's grebe             | <i>Aechmophorus clarkii</i>          | P                                               | P                                              | Year-round                 |
| Common eider              | <i>Somateria mollissima</i>          | -                                               | P                                              | Non-breeding               |
| Common loon               | <i>Gavia immer</i>                   | -                                               | P                                              | Year-round                 |
| Common murre              | <i>Uria aalge</i>                    | -                                               | P                                              | Year-round                 |
| Double-crested Cormorant  | <i>Phalacrocorax auritus</i>         | -                                               | P                                              | Year-round                 |
| Evening grosbeak          | <i>Coccothraustes vespertinus</i>    | -                                               | P                                              | Year-round                 |
| Flammulated owl           | <i>Psilosops flammeolus</i>          | -                                               | P                                              | Breeding                   |
| Forster's tern            | <i>Sterna forsteri</i>               | P                                               | P                                              | Breeding                   |
| Franklin's gull           | <i>Leucophaeus pipixcan</i>          | P                                               | P                                              | Breeding                   |
| Golden eagle              | <i>Aquila chrysaetos</i>             | P                                               | P                                              | Year-round                 |
| Great shearwater          | <i>Puffinus gravis</i>               | -                                               | P                                              | Non-breeding               |
| Laysan albatross          | <i>Phoebastria immutabilis</i>       | -                                               | P                                              | Year-round                 |

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| <b>Common Name</b>     | <b>Scientific Name</b>                   | <b>Potential Occurrence on the Installation</b> | <b>Potential Occurrence Under the Airspace</b> | <b>Seasonal Occurrence</b> |
|------------------------|------------------------------------------|-------------------------------------------------|------------------------------------------------|----------------------------|
| Lesser yellowlegs      | <i>Tringa flavipes</i>                   | P                                               | P                                              | Migration                  |
| Lewis’s woodpecker     | <i>Melanerpes lewis</i>                  | P                                               | P                                              | Year-round                 |
| Long-eared owl         | <i>Asio otus</i>                         | -                                               | P                                              | Year-round                 |
| Long-tailed duck       | <i>Clangula hyemalis</i>                 | -                                               | P                                              | Year-round                 |
| Manx shearwater        | <i>Puffinus puffinus</i>                 | -                                               | P                                              | Year-round                 |
| Marbled godwit         | <i>Limosa fedoa</i>                      | -                                               | P                                              | Year-round                 |
| Mountain plover        | <i>Charadrius montanus</i>               | -                                               | P                                              | Non-breeding               |
| Murphy’s petrel        | <i>Pterodroma ultima</i>                 | -                                               | P                                              | Non-breeding               |
| Northern harrier       | <i>Circus hudsonius</i>                  | P                                               | P                                              | Year-round                 |
| Oak titmouse           | <i>Baeolophus inornatus</i>              | -                                               | P                                              | Year-round                 |
| Olive-sided flycatcher | <i>Contopus cooperi</i>                  | P                                               | P                                              | Breeding                   |
| Oregon vesper sparrow  | <i>Poocetes gramineus affinis</i>        | -                                               | P                                              | Breeding                   |
| Pectoral sandpiper     | <i>Calidris melanotos</i>                | P                                               | P                                              | Migration                  |
| Pink-footed shearwater | <i>Ardenna creatopus</i>                 | -                                               | P                                              | Migration                  |
| Pinyon jay             | <i>Gymnorhinus cyanocephalus</i>         | -                                               | P                                              | Year-round                 |
| Pomarine jaeger        | <i>Stercorarius pomarinus</i>            | -                                               | P                                              | Year-round                 |
| Red knot               | <i>Calidris canutus roselaari</i>        | -                                               | P                                              | Year-round                 |
| Red phalarope          | <i>Phalaropus fulicarius</i>             | -                                               | P                                              | Year-round                 |
| Red-breasted merganser | <i>Mergus serrator</i>                   | -                                               | P                                              | Year-round                 |
| Red-necked phalarope   | <i>Phalaropus lobatus</i>                | -                                               | P                                              | Migration                  |
| Red-throated loon      | <i>Gavia stellata</i>                    | -                                               | P                                              | Year-round                 |
| Ring-billed gull       | <i>Larus delawarensis</i>                | -                                               | P                                              | Year-round                 |
| Rufous hummingbird     | <i>Selasphorus rufus</i>                 | -                                               | P                                              | Breeding                   |
| Sage thrasher          | <i>Oreoscoptes montanus</i>              | P                                               | P                                              | Breeding                   |
| Scripps’s murrelet     | <i>Synthliboramphus scrippsi</i>         | -                                               | P                                              | Year-round                 |
| Short-billed dowitcher | <i>Limnodromus griseus</i>               | -                                               | P                                              | Year-round                 |
| Sooty shearwater       | <i>Ardenna grisea</i>                    | -                                               | P                                              | Year-round                 |
| South Polar skua       | <i>Stercorarius maccormicki</i>          | -                                               | P                                              | Year-round                 |
| Surf scoter            | <i>Melanitta perspicillata</i>           | -                                               | P                                              | Year-round                 |
| Thick-billed longspur  | <i>Phynchophanes mccownii</i>            | -                                               | P                                              | Year-round                 |
| Tufted puffin          | <i>Fratercula cirrhata</i>               | -                                               | P                                              | Breeding                   |
| Virginia’s warbler     | <i>Leiothlypis virginiae</i>             | -                                               | P                                              | Breeding                   |
| Western grebe          | <i>Aechmophorus occidentalis</i>         | P                                               | P                                              | Year-round                 |
| Western gull           | <i>Larus occidentalis</i>                | -                                               | P                                              | Year-round                 |
| Western screech-owl    | <i>Megascops kennicottii cardonensis</i> | -                                               | P                                              | Year-round                 |
| White-winged scoter    | <i>Melanitta fusca</i>                   | -                                               | P                                              | Year-round                 |
| Willet                 | <i>Tringa semipalmata</i>                | P                                               | P                                              | Breeding                   |
| Williamson’s sapsucker | <i>Sphyrapicus thyroideus nataliae</i>   | -                                               | P                                              | Year-round                 |
| Wrentit                | <i>Chamaea fasciata</i>                  | -                                               | P                                              | Year-round                 |



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| <b><i>Common Name</i></b> | <b><i>Scientific Name</i></b>         | <b><i>Potential<br/>Occurrence on the<br/>Installation</i></b> | <b><i>Potential<br/>Occurrence<br/>Under the<br/>Airspace</i></b> | <b><i>Seasonal<br/>Occurrence</i></b> |
|---------------------------|---------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------------|---------------------------------------|
| Yellow rail               | <i>Coturnicops<br/>noveboracensis</i> | -                                                              | P                                                                 | Breeding                              |

*Legend:* ANGB = Air National Guard Base; P= Potential.

*Sources:* Cornell University 2024; NGB 2023, 2024; USFWS 2024a, 2024b

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## **APPENDIX E    LIST OF PREPARERS**

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***Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit  
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| <b><i>Name/Organization</i></b>                 | <b><i>Experience</i></b>                                                                                      | <b><i>Years of Experience</i></b> |
|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------|-----------------------------------|
| Alicia Treece<br>NGB/A4FR                       | M.S., Environmental Policy and Management, 2013<br>B.S., Earth Systems Science and Policy, 2005               | 15                                |
| Alyssa Andrews<br>Stantec GS                    | B.S., Environmental Studies, 2023                                                                             | 1                                 |
| Kate Bartz<br>Stantec GS                        | M.S., Landscape Architecture and Environmental Planning, 1994<br>B.S., Environmental Studies, 1987            | 38                                |
| Katie Briscoe ( <i>RPA</i> )<br>Stantec GS      | M.S., Historic Preservation, 2012<br>M.A., Archaeology, 2010<br>B.A., History, 2008                           | 5                                 |
| Raul Castillo<br>Stantec GS                     | M.S., Urban Planning, 2019<br>B.S., Business Administration, 2016                                             | 6                                 |
| Christine Chaplin ( <i>GISP</i> )<br>Stantec GS | B.S., Natural Resources and Environmental Management, 2005                                                    | 17                                |
| Scott Coombs<br>Stantec GS                      | M.S., Marine Sciences, 2006<br>B.S., Hydrological/Geological Sciences, 1997                                   | 25                                |
| Chris Davis ( <i>AICP, PMP</i> )<br>Stantec GS  | M.S., Environmental Management, 2000<br>B.S., Environmental Studies, 1998                                     | 26                                |
| Carolyn Dunmire<br>Stantec GS                   | M.S., Engineering Economic Systems, 1989<br>B.S., Chemical Engineering, 1983                                  | 35                                |
| Lesley Hamilton<br>Stantec GS                   | B.A., Chemistry, 1988                                                                                         | 34                                |
| Yuri Innis<br>Stantec GS                        | M.S., Aeronautics, 2014<br>B.S., Professional Aeronautics, 2009                                               | 24                                |
| Patrick Kester<br>Stantec GS                    | B.S., Mechanical Engineering, 2006                                                                            | 13                                |
| Leah McCormick ( <i>AICP</i> )<br>Stantec GS    | M.S., Environmental Science and Management, 2017<br>B.S., Environmental Systems and Earth Sciences, 2014      | 10                                |
| Isla Nelson ( <i>RPA</i> )<br>Stantec GS        | M.P.S., Cultural and Heritage Resource Management, 2024<br>B.A., Anthropology, 2001                           | 21                                |
| Geoff Olander<br>Stantec GS                     | B.S., Mechanical Engineering, 1990                                                                            | 32                                |
| Abigail Potts Mouch<br>Stantec GS               | M.S., Ecology and Evolutionary Biology, 2020<br>B.S., Ecology and Evolutionary Biology, 2018                  | 9                                 |
| Derek Stadther<br>Stantec GS                    | M.Eng., Acoustics, 2014<br>B.S., Physics, 2012                                                                | 10                                |
| Ashley Thompson<br>Stantec GS                   | B.S., Environmental Science, 2023                                                                             | 1                                 |
| Vanessa Williford<br>Stantec GS                 | M.A., Environmental Sustainability and Development, 2014<br>B.S., Resource and Environmental Management, 2002 | 20                                |
| Kim Wilson<br>Stantec GS                        | Document Production Manager                                                                                   | 41                                |
| Lisa Woeber<br>Stantec GS                       | B.B.A., Business Administration, 1998                                                                         | 26                                |

## **APPENDIX F      REFERENCES**

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| <b>Author</b>                                                             | <b>Citation</b> | <b>Title</b>                                                                                                                                                                                                                                                                               |
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| <b>Author</b>                                                    | <b>Citation</b> | <b>Title</b>                                                                                                                                                                                                                                                                                                                             |
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