

High Intensity, Multi-Day, Air-Land Military Training Coming to the Adirondack Park

Back in June something occurred with potentially great significance for the Adirondack Park that flew below the proverbial radar. That month a letter was mailed from the U.S. Army at Ft. Drum to selected agencies notifying them that “Fort Drum is initiating agency coordination for a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area.”

That nine county Local Flying Area includes large portions of the Adirondack Park.

Interestingly, the Army's letter and lengthy environmental assessment document never mentions the existence or the significance of the Adirondack Park, or of the Forest Preserve, or of state constitutional protection under Article 14.

The letter from the Army continued: “The proposed action includes conducting up to six high-intensity, multiday training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield.”

“ Attached is the Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impact (FONSI) that analyzes and evaluates the potential environmental impacts of increasing mission and training activities at Fort Drum Army Installation and within the Local Flying Area (LFA) of Fort Drum. Environmental consequences were analyzed for two action alternatives; conducting high-intensity, multi-day training events to replicate multi-domain battle, either two or six times per year, as well as the No Action Alternative. This PEA describes the application of criteria provided by Fort Drum to select specific sites for the proposed training events...The site specific NEPA review will be tiered from the PEA and will be consistent with this document, incorporating by reference where appropriate.”

The letter concludes: “Your assistance in providing information is greatly appreciated. Please provide written comments by close of the public comment period to Ms. Cait Schadock, NEPA Coordinator, Directorate of Public Works, 4896 Jones St, Fort Drum, NY 13602-5097, or send via email to usarmy.drum.imcom.mbx.dpw-nepa@mail.mil. If nothing is heard by this date, it will be taken as agreement with this action.... Public Comments will be received from July 6, 2020 to August 5, 2020.”

Adirondack Wild would not have received the army's letter because we were not among the army's “coordination and consultation” list. Neither, I noted, was the Adirondack Park Agency, the sole agency with planning responsibility for the entire Adirondack Park. The APA did receive it eventually, perhaps from its sister agency DEC, which was included in the army's list. Regardless, we learned about it through the proverbial grapevine and submitted a letter by the army's August deadline, as did other organizations. See our Letter here. [letter to US Army Ft. Drum Aug. 2020](#). In a very timely and presumably standardized email response, the army acknowledged that our letter had been received and would be considered. That was appreciated.

Yet, here is a proposed action involving air and land combat forces who will be devoting weeks at a time intensively training with encampments inside the Adirondack Park, perhaps on private land, perhaps near private farms, forests or municipalities, perhaps inside Wilderness, Primitive, Canoe or Wild Forest

areas of the public's "forever wild" Forest Preserve, that the army promises will have no significant impact of any kind whatsoever.

There are certainly many impacts – cultural, environmental, health and safety - that can be envisioned from the intense training proposed. Given President Trump's executive orders earlier this year that federal agencies can effectively ignore the National Environmental Policy Act, or NEPA, perhaps I should be grateful that the army has observed NEPA and performed an environmental assessment of any kind and to any standard. But what the army has done so far in its environmental assessment has been in my opinion superficial, unsubstantiated and conclusory.

The army concludes that because the training operations are temporary any impacts to land use and to human communities would be short-term in nature. Yet, the army is proposing up to six, 3 week-long exercises during a year. That is 126 days out of the year – year after year. That is not a reasonable person's definition of temporary.

Here are some additional concerns:

- In the past, New York's Air National Guard has worked early and often with the Adirondack Park Agency and with other state and private organizations in a shared, transparent discussion about guidance of aerial military operating areas and training routes over regions of the Adirondack Park. That past, relatively successful experience was not replicated in the June Ft. Drum invitation of comment letter which seemed abrupt, curt, conclusory and which failed – at least initially - to reach or consult key agencies and constituencies of the Park. Hopefully those communication oversights have been corrected since August;
- In its programmatic environmental assessment, or PEA, the army is proposing a tiered analysis whereby the scoping of issues and impacts and depth of analysis is broken down into discrete elements and actions. In New York law (State Environmental Quality Review Act) this is known as segmented review, whereby the overall extent and scope of an action is concealed while each detailed activity receives its own separate evaluation, out of context with or segmented from an overall scheme or plan. In this way, the army's scope of activity and environmental assessment lacks comprehensive treatment. This would be a violation of State and Federal law;
- The Army's PEA fails to identify the Adirondack Forest Preserve, much less specify whether their enhanced training missions would impact designated Wilderness, Primitive, Canoe or Wild Forest areas. A full EIS is needed to identify specific areas of the Forest Preserve that could or would be preferentially selected for the enhanced training missions, and to avoid, minimize or mitigate actual or potential environmental impacts on the public's wild lands involved;
- The Army's PEA must pay more attention to actual and potential noise impacts on human and natural communities of the Park, including the Adirondack Forest Preserve. Sound sensitivity and impacts from existing military operating areas and training routes vary tremendously across the Park. How will the enhanced training magnify or increase ambient aircraft and land motorized uses across the 9-county area, in both time and space? What are the cumulative impacts above and beyond the existing military operating areas and training routes? Only a full EIS might be able to answer such questions.

Stay tuned for the U.S. Army at Ft. Drum response to the multiple letters of concern and requests from State and private agencies for a full EIS.