

18 February 2022

Arizona Regional Airspace EIS

c/o Cardno, 501 Butler Farm Rd.,

Suite H, Hampton, VA 23666

(submitted through the project website www.ArizonaRegionalAirspaceEIS.com)

Dear Sir or Madam:

We are writing to comment on alternatives to and the impacts of a revised Special Use Airspace in response to the NOI to prepare an EIS for that Special Use Airspace. Our comments on the Scoping process are particularly about the Tombstone MOA. We are and have been residents of this region for 20 years.

Insufficiency of the Information Provided

Very little information has been provided by the Air Force. Most particularly, nothing is said about the expected level of use of the Tombstone MOA, even in relation to current use, or even of the extent to which the entire SUA will see increased use. As citizens who can understand the importance of national defense, we have been and are willing to share some level of the discomfort and damage that comes with such training, but it needs to be proportionate. Further, the Scoping process depends on the identification of direct, indirect, and cumulative impacts, and the quality of the eventual EIS certainly depends on assessment of them (how does one comment on the cumulative effect if one does not know the frequency of the impact?). So, as a simple example, for nesting threatened bird species, whether there is one sonic boom a month 25 miles away is very different from daily sonic booms overhead. No one is going to be able to contribute fully to the Scoping Process in the absence of information on the anticipated use of the SUA.

In addition, at what stage of the process are you planning to produce a map showing decibel levels of 100' AGL flights in relation to the residents of the Tucson MOA? When are the graphics of shock wave strength from sonic booms at 5000' AGL and 10,000' going to be provided? Before March 4, 2022, or 18 months later with the Draft EIS?

Inadequacy of the Proposed Alternatives

Some might consider the Chiricahua Mountains the most biologically diverse area in the United States. While such a designation may not be calculable, we suggest that the Air Force cannot deny that the Chiricahua Mountains are One of the Most Biologically Diverse Areas in the United States of America, henceforth "OMBDAUSA." So what is the Air Force's justification for proposing that an OMBDAUSA be subjected to increased levels of stress (sonic booms, lower flight levels, chaff, flares, etc.) at an unknown

level of frequency? More to the point, why is the Air Force not able to design an alternative that excludes the Chiricahua Mountains (and perhaps other such OMBDAUSAs)? Instead, the Air Force at best considers Alternative 1 (no change).

Proposed Alternatives: A Further Comment Related to the Local Economy

In part because it is an OMBDAUSA, the Chiricahua Mountains are visited by many tourists; these visits are important to the local economy. We note in particular that some of the Arizona Congressional Delegation have recently (and previously) been championing the elevation of Chiricahua National Monument to the status of National Park. The Air Force's approach is to expand the Tombstone MOA to the edge of Chiricahua N.M. or to include part of it (it is hard to read the map). At the same time the Air Force is proposing that 100' AGL flights and 5,000' AGL sonic booms are appropriate to the Wilderness Areas of the Chiricahua Mountains. This is out of step with how other branches of the Federal Government view the value and importance of these areas, and how residents and visitors treasure them.

Proposed Alternatives: A Comment on Another Approach

While our recommendation is to exclude the Chiricahua Mountains from the Tombstone MOA, if that does not occur, we expect the EIS to thoroughly consider other options to modify each of the alternatives to reduce the impact on the environment. In particular, certain activities in the MOA could be seasonal, e.g., with reference to the breeding seasons of threatened species or specific to conditions, e.g., to reduce the potential danger of fires from military activities (for instance, that the Air Force not use flares except when the Forest Service classifies the Fire Danger as "Low").

Data

We expect the EIS to use current data (along with older data) to assess the impacts. We note specifically recent events that have had substantial effects on the region. A series of fires, most notably Horseshoe 2 (225,000 acres affected; 2011), have had a major impact on the environment of the Chiricahua Mountains. A drought since the year 2000 was recently characterized as the worst in at least 1,200 years based on tree ring data, and a period in 2020-2021 was described variously as the worst or second worst in Arizona history (2021 brought less relief to the Tombstone MOA than to some areas farther west). Data used in the EIS needs to reflect these changes, and not be solely from wetter earlier decades, such as the 1970s and 1980s.

On a related note, while Climate Change remains controversial politically, scientifically it is hardly so. Courts have increasingly required governments to factor in the potential effects of Climate Change. In assessing the resiliency of the Sky Islands and other habitats and regions affected by the SUA, we expect the EIS to consider the likely effects of climate change on the fragility of the affected areas (e.g., flares and fire danger).

Enforcement

We are not spying on each other with Air Tags, but apparently we could. If we can spy on each other, the Air Force can surely keep track of its planes. And yet the sense we have is that very few in the community believe the Air Force seeks to enforce its own rules. Perhaps recent years have seen a change in this regard. In any event, whatever SUA rules emerge, if they are to be effective the Air Force

must implement a robust set of enforcement mechanisms that include making it easy for the public to report apparent violations (which are copied to the Arizona Congressional Delegation) and some reason to believe that the Air Force effectively investigates them.

A Final Comment

We are not alleging environmental racism, and we can understand that the fewer people who are affected by sonic booms, etc., the better, but at the moment there is a heavy whiff of potential disproportionality in the location of the impacts from the proposed actions. We could be accused of NIMBY (Not In My Back Yard); that is true, because our back yard adjoins an OMBDAUSA, and so we are asking the Air Force to be extremely careful and thoughtful throughout this EIS process on behalf of the natural environment and all of the neighboring human environment.

Thank you,

Richard E. Webster & Rose Ann Rowlett

[address and emails redacted]