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Arizona Regional Airspace EIS c/o Cardno

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Hampton, VA 23666 (submitted through the project website  
[www.ArizonaRegionalAirspaceEIS.com](http://www.ArizonaRegionalAirspaceEIS.com) )

To Whom It May Concern:

I write in response to alternative proposals in the Department of the Air Force's NOI to prepare an EIS for Regional Special Use Airspace Optimization, and I am commenting specifically on the proposed expansion of the Tombstone MOA across the Chiricahua Mountains into New Mexico's Bootheel. Others have mentioned inadequacies of the scoping process. Missing details currently preclude specific comments on the geographic distribution of intensity of impact, proposed flight frequencies, decibel levels, flare and chaff ejection frequencies, etc. Therefore, my comments emphasize the special qualities of the proposed expansion area and the general nature of threats the various proposals pose to our surroundings. I strongly urge you to adopt Alternative 1, the 'no-action' alternative, and to look preferentially at other geographic options instead.

I oppose proposed expansion of the Tombstone MOA to optimize military training that could be accomplished in an area far less sensitive to ecological damage. Although I understand the need for such training, locating it in the Chiricahua Mountains, which encompass numerous protected and ecological research areas, is akin to driving tanks through the Smithsonian Museums. Our deserts and neighboring mountain ranges are not just empty space. We are an internationally recognized and pristine natural area visited annually by tens of thousands of hikers, scientists, bird-watchers and other naturalists. Our entire economy is oriented toward natural history tourism, and virtually all our residents and visitors are here mainly because of spectacular local biodiversity (the greatest in the western U.S.), peaceful dark skies, and the scenic beauty of this special place.

**My background:** I retired to Portal, AZ, 12+ years ago after a career in zoology, mostly at the University of Utah. I reside on four acres at the mouth of Cave Creek Canyon, and I have served on the Board of Portal Rescue, our local **volunteer** fire and emergency medical organization, for half of my residency here. I also authored our community's successful Firewise application and wrote another proposal for a fuel break to allow firefighter access for protection of Portal village. I have volunteered for years as a radio operator for fire and EMS calls. I have been evacuated from my home during wildfire and been treated with oxygen at the fire camp for smoke inhalation. All of this is to say that I know a bit about fire hazards in our area.

The following are my diverse objections to the MOA:

**Wildfire risks.** Given the dry, warm-season grasses persisting after monsoon rains, and winds regularly blowing over 50 mph in late winter and spring, all it takes to wipe out our homes and surrounding environment is **a single spark**. Fueled by high winds, the Horseshoe 2 fire spread down Sulphur Canyon on the Chiricahuas' eastern slope in 2-3 hours, lapping over the hillside above Portal village overnight, driving many residents to evacuate in darkness, eventually burning ~ 225,000 acres of the range, and destroying various structures in the process.

Chaff and flares released at low altitudes (alternatives to no action show 2000') present an unacceptable hazard to both residents and the natural environment on which we depend. Aftereffects of the early 1990s Rattlesnake fire, together with those of the 2010-11 Horseshoe 1 & 2 fires, show that treasured forests will not recover from fire during our lifespans. Badly and twice-burned areas may never recover. Rustler Park Campground and the Crest Trail are unrecognizable compared to pre-fire eras, missing many stately Douglas Firs and thick Ponderosa and Arizona Pine forests. Wildlife species migrating seasonally over different elevations have encountered diminished resources throughout their ranges. (Bear populations have declined precipitously.) Destructive post-fire flooding has permanently altered stream courses, killing off majestic Arizona Cypress in the process, and transforming wandering and vegetation-lined (almost tropical) *quebradas* into scoured-out broad flood plains susceptible to invasion by exotic plant species.

Wildfire risk is magnified by both our nearly unprecedented drought and future prospects for increasing drought under climate change. Chaff also threatens to pollute our lands, and the waters where stream flows have been much depleted by drought. Already plagued by fires spreading from abandoned smuggler camps, our communities cannot afford greater exposure to fire risk.

**Risk to EMS services:** Currently, 25-30% of our patients require air transport, and military flights soaring through canyons and operating down to 100' altitude could easily threaten helicopter transport headed to and from Portal Rescue Station or remote sites. There is no mention of how the military would coordinate communications with rescue flights.

**Noise:** I have prior experience with the types of flights now proposed here. On one of my first days in my new home, I was terrified to watch a military jet zooming down Cave Creek Canyon, seemingly headed right through my dining-room window. The sound was deafening, and had my heart been weaker, I might have expired in fear. Obviously, the plane was flying in a zone, and at an altitude, not permitted at the time.

This was not an isolated incident. Subsequently, I have watched the responses of domestic and wild animals (e.g., deer, wild turkeys, rabbits) to many similar flights, both permitted and flagrantly defying regulations. Given the past history of violations, many of which local residents have reported, I have little faith that pilots would adhere to the requisite altitude limits for flight and for supersonic flight, as well as for incendiary release. Who will monitor these flights? No information is provided.

Animals have ears much more sensitive to loud noises than our own, and the deafening sounds terrify them. My dogs respond in full panic, running in circles, diving for cover, trying to attack and protect me from the mechanical beasts, and in one case, becoming lost for hours. Feeding and reproductive activities by wildlife are known to accompany similar stress from military overflights (<https://www.nonoise.org/library/npreport/chapter5.htm>). The proposed alternatives to no action would legalize these formerly non-permitted flights over our homes, domestic animals, native wildlife, and ranchers' livestock, by expanding allowable flight paths and numbers and reducing limits for low altitude maneuvers. Minimum altitudes for supersonic flights would be reduced by an astounding 20,000-25,000'.

**Scientific research:** The eastern slope of the Chiricahuas, and Cave Creek Canyon in particular, have benefitted from a long history of scientific research by national and international investigators. Hundreds (probably thousands) of ecological, geological and hydrological studies have been undertaken by scientists staying at the century-old Southwestern Research Station of the American Museum of Natural History (SWRS). Importantly, many of these studies are long-term, continuing over even decades, and sonic booms and low altitude flights by fighter jets would likely compromise many of them.

The Malpai Borderlands Group (MBG), founded by a former MacArthur Foundation awardee, has organized local ranchers to commit to environmentally sound range management and to sponsor agricultural research and education. All of the points made above apply not just to the Chiricahuas, but equally to ranches in the Peloncillo Mountains and New Mexico's Bootheel. Like the Portal area, this is a realm of spectacular biodiversity (it includes antelope and desert bighorn sheep) and susceptibility to catastrophic wildfire.

**Coda:** Most of my professional life was spent working in remote areas of the Amazon, where uncontacted tribes still roamed, and in Bornean and New Guinean rain forests. Even these places are in jeopardy now, the western Amazon from gold mining, Borneo and New Guinea from logging, and all three places from rapidly increasing populations. With few intact ecosystems remaining on the planet, we must protect the wilds that remain, including the animal life that molds their vegetation and form. The Chiricahuas and neighboring Peloncillos are as wild as our country now affords, their ecosystems much more intact than most. (Jaguars have been reported from both ranges!) The highly interactive, closely cooperative, and vigorous community of naturalists in these areas have successfully protected nearby public lands from mining and private ones from a commercial marijuana farm. We will continue to work together to preserve the wild spaces around us.

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