

Arizona Regional Airspace EIS  
c/o Cardno, 501 Butler Farm Rd.,  
Suite H, Hampton, VA 23666  
(submitted through the project website [www.ArizonaRegionalAirspaceEIS.com](http://www.ArizonaRegionalAirspaceEIS.com) )

Dear Sir or Madam,

I am writing to notify you of my opposition to Alternatives 2, 3, and 4 of the proposed expansion of Special Use Airspace for southeast Arizona and southwest New Mexico, as described in the NOI to prepare an EIS for that proposal. My comments are specific to the Tombstone MOA because I have been a resident of this MOA region for 25 years.

My concerns are as follows:

**Lack of public response time**

Despite any federal regulations that allow for such short deadlines for scoping comments and public scoping meetings, the likelihood of substantial impacts on local communities from this proposal warrants an extension of the scoping comment period and the addition of more scoping meetings in more geographically-centralized locations in the Tombstone MOA. Unfortunately, this lack of public inclusion repeats the experience with the USAF's recent withdrawal of the proposed Holloman airspace expansion, in which the Air Force initially excluded key affected parties in the Silver City, New Mexico area. NEPA is supposed to be about public disclosure and engagement. The Air Force has failed on these counts once again with the Tombstone MOA proposal.

**Insufficiency of Information Provided**

Numerous important facts are difficult, if impossible, to find and should be made widely public:

- Highly detailed maps are essential for the public to understand where the expansion of flights will occur. Better maps should be provided during the comment periods and meetings. The map provided of the Tombstone MOA boundaries is vague and has caused confusion.
- Number of flights per day and types of aircraft to be used are not specific.
- There is no indication of what the negative effects of each Alternative will be on affected communities, including on wildlife, livestock, Wilderness, the economy, and human health and well-being.
- The effects of extreme noise, increased fire danger from flares, and air/water contamination from chaff on all of the above communities are many and serious and must be made known to the public before any informed discussion can occur.
- There is no mention of any benefits that any of the Alternatives would provide to these communities. At the recent scoping meeting in Animas, NM, the Air Force response to the question of what benefits could be expected under the new proposal were uniform: "None."

**Inadequacy of Proposed Alternatives for the Tombstone MOA**

Alternatives 2, 3, and 4 are so similar that they beg legitimacy as being true alternatives. Beyond the removal of the tiny sliver of airspace to be expanded in Alternative 2, Alternative 3 remains the same as 2. Alternative 4, while slightly increasing the altitudes of supersonic and subsonic flight, also remains otherwise the same as Alternative 2. The fact of the matter is that all of the negative impacts of the proposed expansion will remain the same regardless of Alternatives 2, 3, or 4 because of the regular disregarding of current MOA boundaries and altitude regulations by pilots using the Tombstone MOA.

**Poor enforcement of existing Tombstone MOA boundaries and regulations**

As a long-time resident of the area affected, I have been constantly reminded that violations of existing low-level flight minimums are the norm in the Tombstone MOA. F-16s and A-10s regularly fly at barely above tree-top level, far below the lowest altitude allowed under current regulations. When Davis-Monthan is contacted to report such violations, there is no meaningful response because the wing numbers, exact time of day, and GPS locations are rarely available. All of this considered, it is absurd to think that even more relaxed regulations and boundaries will not be continually violated. The Air Force must implement a robust set of enforcement mechanisms that include making it far easier for the public to report violations and that ensure that elected officials are copied on all such reports, and guarantees that the Air Force will effectively investigate these violations and take tangible actions to stop them. Without these assurances, the new regulations in the proposed Tombstone MOA, as well as the already existing MOA regulations, become meaningless.

**Show proof of support from other agencies**

The Air Force must get approval of its proposed operations from other government agencies when those operations can have significant negative impacts on the health of the lands those other agencies manage. Of critical importance will be the support from the Dept. of Interior, the U.S. Forest Service, the National Parks Service, the Bureau of Land Management and likely others. As an example, assuming that dropping operational levels to 100' AGL for subsonic and to 5,000' AGL for supersonic flights will not negatively affect the Wilderness Areas and other protected areas of the Chiricahua, Peloncillo and surrounding mountain ranges is completely out of step with how these other agencies view the value and importance of the lands they manage, and how residents and visitors treasure them.

Thank you for the opportunity to comment on this proposal.

Kim Vacariu

[address and phone redacted]