

Adriane Paris
Air Force Federal Register Liaison Officer
Grace Keesling, USAF
[FR Doc. 2022-00749 Filed 1-14-22]
Re: Arizona Regional Airspace EIS

February 20, 2022

Dear Adriane Paris and Grace Keesling,

Thank you for the opportunity to comment on the Department of the Air Force's (DAF) Notice of Intent to Prepare an Environmental Impact Statement (EIS) for Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona NOI(FR Doc. 2022-00749, Filed 1-14-22, 87 Fed Reg 11 at 2597.)

We respect the role of the USAF in assuring the nation's security and appreciate the importance of appropriate training. At the same time, as the Notice of Intent recognizes, the DAF must act according to law, including environmental laws, and consider reasonable alternatives and limitations. Therefore, we urge DAF to consider four points as it analyzes its initial proposal and prepares its draft EIS.

First, DAF needs to analyze and explain why it has confined its assessment of Military Operations Areas (MOAs) to Arizona. The DAF NOI refers to the National Airspace System (NAS) and a "regional approach." USAF prizes power projection; most actual missions will involve flying considerable distances before engaging in tactical maneuvers. Therefore, for realistic training, USAF should consider flights to nearby neighboring areas, such as Nevada, New Mexico, and Texas. These states already host bases with training areas that might combine arms and maneuvers with challenging terrain, such as missile and munitions ranges in New Mexico, parallel mountains and valleys in Nevada, and armored operations at Fort Hood, Texas. To encourage joint war-fighting capabilities and training, USAF should explore U.S. Army areas as well, such as Fort Hood. Such combinations of operations, weaponry, and conditions are actually more likely to approximate the battlefields and other areas overseas in which USAF pilots might need to fly.

At a minimum, given the serious environmental issues involved, DAF should explain the basis of its geographical limitation.

Second, as senior Air Force and other Department of Defense leaders have pointed out, the United States will need to accelerate the transition from manned aircraft to drones and similar non-piloted aircraft. Given the serious, ongoing disturbances and environmental effects involved with the "optimization" of the existing Special Use Airspace (SUA), DAF should consider and analyze whether and how these steps relate to training with the platforms of the future. DAF is likely making long-term decisions through these proposed changes; some intrusions may not be necessary for drone training. DAF should consider whether the proposed changes match training and operational needs for the next decade and beyond, including for non-piloted aircraft.

Third, the EIS will need to account for especially diverse and complex environmental effects. For example, DAF might mistakenly assume that lower population densities in proposed MOAs suggest less disturbance, when in fact these natural areas are less populated in part because of their exceptional and unique natural and environmental conditions, often preserved through conscious human effort (eg. Malpai Borderlands, Diamond A Ranch) An EIS must examine the effects on these special ecosystems.

Indeed, the U.S. Government – and through it, the American people – have recognized the locations DAF proposes to target through designations as National Forests, National Monuments, protected wilderness and Zoological-Botanical areas. The U.S. Government has demonstrated its recognition of the special environmental qualities of some of these areas since President Theodore Roosevelt’s administration over a century ago and before Arizona became a state. It would be contradictory for DAF to now designate these places for the disruptions of military operations because past protections spared them from traditional development.

DAF must also confront some especially challenging tasks of environmental assessment. Some of the areas of Southeast Arizona in question are home to bird and animal life found nowhere else in the United States. For example, the “sky islands” in the Tombstone MOA with which we are most familiar, are recognized around the world for the rare combination of desert uplands, riparian canyons, and mountains forested with rare high-latitude species. They reveal rare migratory, nesting, and feeding conditions; these unique ecological systems—and their interaction – could be easily disrupted by intrusions. Some locations reflect unique Native American artifacts and cultural histories.

In effect, DAF is proposing an ongoing, permanent process of physical intervention in these unique areas. If the Departments of Agriculture or Interior wished to consider projects in these ecosystems, they would have to carefully research persistent disruptive effects. DAF must meet the same legal standard.

Moreover, DAF is not proposing distant overflights or temporary exercises. The DAF must assess risks to rare migrations and nesting caused by frequent supersonic flights (and booms) at 5000 feet. Flights at such speeds, at such levels, close to rock formations would likely lead to damage from sound waves. Has DAF assembled or commissioned research about the effects of such extreme intrusions on avian and other wildlife or vulnerable geological formations?

DAF also proposes the use of flares and chaff as part of its training. The use of incendiaries in such dry wooded and brush terrain is, to be blunt, extremely foolish. The U.S. Forest Service of USDA continually monitors the high risks of fires in these arid areas and has even undertaken operations to clear brush, wood, and make firebreaks. DAF seems to be considering regularly dropping matches and sparks in woods and plains suffering from drought.

Finally, if DAF proceeds with its plans for “optimizing” MOAs, it should further optimize by excluding areas – especially forests, mountains, and canyons – that the U.S. Government has recognized as protected places, whether as national forests, designated wilderness, parks, or memorials. To ensure safety from damage to birds, animal life, flora and rock formations, DAF should add a reasonable buffer to all these protected places.

We recognize that some planners might want training exercises in rare canyons, but they would not presume to disrupt the Grand Canyon; federally-designated forests and monuments also deserve recognition as places – prioritized through governmental and public processes – that warrant special protection from the obvious risks posed by supersonic flights and warfighting maneuvers and materials at extremely low levels.

In closing, we sincerely appreciate DAF’s efforts to solicit input as it analyzes its proposed action. We respect training requirements. Nevertheless, we urge DAF to stretch its review beyond the incremental approach of just expanding past patterns of MOAs in Arizona to encompass joint service and regional alternatives that might actually better suit future military needs while avoiding environmental risks and irreparable costs. Furthermore, a valid EIS must recognize the natural rarity and wealth of ecosystems beyond the direct human environment. Thousands of people over many decades and at considerable cost have worked to preserve the “remote” areas at issue. Prior actions by the U.S. Government over a century should offer a guide to places that are particularly vulnerable to damage from exceptional flights, maneuvers, and dangerous materials. Based on the present proposal and information DAF has provided, we recommend Alternative 1, No Action.

Sincerely,

Robert Zoellick
Sherry Ferguson Zoellick
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