

March 1, 2022

Arizona Regional Airspace EIS
(via webform)

To Whom It May Concern:

We are writing to submit scoping comments on the Department of the Air Force's Notice of Intent to Prepare an Environmental Impact Statement for the Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona.

First, we have concerns about the manner in which this process has been conducted. The nearest public meeting for the Tombstone MOA was not only outside of the MOA itself but a 2-hour drive for some in the area. In addition, the time of day at which it was scheduled required that attendees make a long drive after dark on a remote road, which was not feasible for many of our older residents. Despite this, this meeting had over 100 people in attendance which demonstrates the public concern about this project. Many more were not able to attend.

In the future, we request that public meetings be held in locations more accessible to us. Possibilities would include Portal, AZ; Rodeo, NM; and Bisbee, AZ. In addition, we hope that meetings would be webcast through something like Zoom. (We have seen the virtual presentation on your web site, but it offers minimal information and no interaction.)

Next, we have concerns about the **lack of information in the proposal** as currently presented by the Air Force. Below is some of the information that is missing (and that representatives were unable or unwilling to address adequately at the public meeting that was held):

- Why are the proposed changes needed given other military training areas already available?
- What types of planes will be flying under this proposal?
- How many flights will be done? How many flights at low level? How many supersonic flights? How many flights at night? How many flights with chaff? How many flights with flares?
- Over what range will the noise and environmental contaminants be spread, and what will be the effect on both human and wildlife populations?
- Will drones or remotely piloted vehicles be included in this proposal? What types? How many flights?
- Can we get better maps that clearly show the MOA boundaries in relation to towns, roads, etc.?

In addition to this missing information, there are some serious concerns that we request be addressed in the Environmental Impact Study.

We are concerned about and request further data on the **risk of wildfires** resulting from the proposed increase in military training. The Tombstone MOA has already experienced severe wildfires that have cost millions of dollars. In the current environment, we are at extreme risk for fire. This puts at risk both human life and property. The flares that planes would drop as a part of this training would make additional fires inevitable.

We are concerned about and request further data on the **extreme noise** resulting from the proposed increase in military training. I understand that noise from flights at the levels being proposed are above the level at which OSHA requires hearing protection. Not only would human safety be endangered by this, but the impact on wildlife would be severe. These MOAs are home to considerable wildlife, some of which are endangered or at risk species.

We are concerned about and request further data on possible **aircraft accidents** resulting from the proposed increase in military training. In the Tombstone MOA, we already witness “hot dog” pilots making dangerous low runs through our canyons. Accidents have already happened, and more are inevitable. This results not only in a tragic loss of human lives of those serving our military, but also a danger to those living in the area.

We are concerned about and request further data on **contamination of land, air, and water** resulting from the proposed increase in military training. Military flights will generate significant amounts of pollutant emissions and contaminant releases to the environment. Dropping chaff and flares will leave dangerous and persistent chemicals and other waste that is unacceptable.

We are concerned about and request further data on the **impact to air traffic at local airports** resulting from the proposed increase in military training. There are small airports in Rodeo, NM and Douglas, AZ (both at Douglas Municipal Airport and at Cochise College at their flight training school) that apparently have not been considered. In addition, our local fire and rescue crews use helicopter transport for emergency trips to hospitals, because ground transport from our rural area is not feasible. The proposed training expansion would deny the community access to life-saving care for strokes, heart attacks, snake bites, and other serious trauma.

Given all of this, we are concerned about and request further data on the **economic impact** of the proposed increase in military training, in terms of decreased tourism, less business activity, and lower property values.

We also request that **qualified experts** be involved in the Environmental Impact Study to insure that these issues are examined. In addition, the U.S. Forest Service, Bureau of Land Management, National Park Service, U.S. Fish and Wildlife Service Wilderness, Wilderness Study Areas, National Monuments, Research Natural Areas, Areas of Critical Environmental Concern, National Wildlife Refuges, and Special Management Areas should all be consulted.

Finally, we are already experiencing **military flights that do not adhere to existing rules**. We are concerned that an increase in allowable flights will also lead to an increase in flights that do not adhere to the rules. We request that the Air Force better monitor and enforce this.

While it may appear that the Tombstone MOA is a relatively sparsely populated area, in fact, there is a group of active residents who have made the decision to live here, and we are very concerned about this proposal. As residents and business owners in the Tombstone MOA, we are apprehensive and will follow up carefully on the next steps of this process. We sincerely request you consider the above points, look more carefully at the consequences of this proposal, and adopt Alternative 1, No Action.

Sincerely,

Karen Fasimpaur and
Brad Emerson

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cc: Cochise County Board of Supervisors, Governor Doug Ducey, Representative Ann Kirkpatrick, Senator Mark Kelly, Senator Kyrsten Sinema