

March 4, 2022

U.S. Air Force
Arizona Regional Airspace EIS
501 Butler Farm Road, Suite H
Hampton, VA 23666

Re: Opposition to the Tombstone MOA proposal for Expanded Military Training over the Chiricahua and Peloncillo Mountain region

To Whom It May Concern:

Chiricahua Regional Council (CRC) is a citizen's watchdog group that monitors public agency actions and other issues affecting the Chiricahua, Peloncillo, and Dragoon Mountains, and nearby areas of southeastern Arizona, southwestern New Mexico, and adjacent northern Mexico. The CRC promotes responsible land use and wise, science-informed stewardship of our unique natural heritage. Our broad constituency includes scientists, ranchers, birders, naturalists, astronomers, artists, residents, visitors, and many others, who value our region's spectacular qualities.

CRC is not opposed to military training. We are, however, deeply opposed to the Department of the Air Force's proposed action to expand its Military Operations Area over the Chiricahua and Peloncillo Mountain region and surrounding private lands and towns in Arizona and New Mexico for the following reasons:

(1) We object to the way in which this process has been conducted. The nearest public meeting for the Tombstone MOA was not only outside the MOA itself but a 2-hour drive for some in the area and at an inconvenient time of day for many residents. Yet, enough local people were concerned that more than 100 people attended.

(2) Considerable information is lacking in the proposal as currently presented by the Air Force – and representatives at the meeting were unprepared to address those gaps.

(3) This area is in a 1,200-year drought cycle, and the Chiricahuas have already been hit by major wildfire events: The 2011 Horseshoe II fire burned 225,000 acres. The Air Force plan to increase the number of flares is extremely dangerous: The Forest Service has already had several instances of wildland fire ignitions caused almost certainly by flares from Air Force training flights. In the spring of 2021, the Telegraph Fire, near Globe Arizona, was likely ignited by a flare dropped from an Air Force, Air National Guard training flight. This fire cost the taxpayers approximately \$35 million and put more than 1,000 firefighters at risk, in extremely rough terrain at the height of the southwestern fire season.

(4) The historic Chiricahua Wilderness Area, part of America's first Wilderness Act of 1964, is a national treasure. While CRC certainly supports military preparedness, we strongly believe that the Chiricahua Wilderness is not an appropriate place for military training flights.

(5) According to the National Park Service's sound map, southwest New Mexico is one of the quietest regions in the country. Cochise and Hidalgo Counties are renowned for their relaxed atmosphere, natural beauty, dark skies, and numerous federally protected areas. Many people are drawn to this area for its exceptionally high quality of life, and wildlands and wildlife critical to maintaining what's left of nature.

(6) That natural beauty, dark skies, and quiet means that the local economy depends heavily on tourism. The draw of the birding opportunities available in Cave Creek Canyon, one of the world's most celebrated avian viewing spots, generates millions of dollars in income for local businesses. This trend is expected to grow exponentially in the future.

(7) The local residents depend heavily on the local EMS services, and 25-30 percent of patients are medivac'd from this area to hospitals. Increasing the size of the MOA would disrupt if not eliminate helicopter service.

For all these reasons – and more – Chiricahua Regional Council is strongly opposed to the revised MOA as proposed. We ask that the Air Force thoroughly develop an alternative that reduces the Tombstone MOA to exclude entirely the most biologically important areas, primarily the areas of the Coronado National Forest within the MOA, along with adjacent or nearby National Monuments, National Wildlife Refuges, and other specially designated areas. Among the already proposed Alternatives, we can only potentially support Alternative 1 ("no action"), but believe that the Air Force needs to evaluate further exclusions (as it did for the Douglas Airport area of the southern Sulphur Springs Valley) because of the changing demographic, economic, and biological conditions within the MOA

Sincerely,

Wynne Brown, President
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