

My name is Carol Comeau, and I have been a Portal, Arizona, resident for 18 years. I am adamantly opposed to the plan to expand/optimize MOAs in Arizona and New Mexico. My comments refer specifically to the Tombstone MOA. Included are concerns I believe must be addressed in the Draft Environmental Impact Statement.

1. Potential detrimental impacts to wildlife

The Tombstone MOA is in one of the most biologically diverse areas in the United States. In particular, the Chiricahua Mountains are internationally known by wildlife enthusiasts and researchers. The American Museum of Natural History's Southwest Research Station (SWRS) has been based in the canyon since 1955. It was established in Cave Creek Canyon because of the area's uniqueness and biological importance. Because of the proximity to the Sierra Madres in Mexico, SE AZ/NM supports a great diversity of wildlife found nowhere else in the United States. For example, the Mexican Chickadee is a species only found in two areas in the United States- the Chiricahuas in AZ and the Peloncillos in NM. Sensitive species such as the Chiricahua Leopard Frog, Jaguar, Twin-spotted Rattlesnake, Elegant Trogon, and Mexican Spotted Owl can be found in the area your proposal encompasses. Frequent low-altitude flights can disrupt the feeding and breeding habits of wildlife as well as cause an increase in stress levels. For the draft EIS it is imperative and mandated by law that you consult with the US Fish and Wildlife Service to ensure any action authorized, funded, or carried out is not likely to jeopardize the continued existence of any endangered or threatened species or result in destruction or adverse modification of critical habitat.

2. Potential detrimental impacts to plant communities/special ecosystems

The Coronado National Forest has several areas with special designation status: the Chiricahua Wilderness Area, the South Fork Zoological and Botanical Area, and the Pole Bridge Canyon Research Natural Area. Chiricahua National Monument in southeastern Arizona is a prime biodiversity region that draws hikers, bird-watchers, geologists and history buffs. This special area could become a national park under a new bill recently introduced in Congress. Protected areas in New Mexico include the Peloncillo Mountains, Baker Canyon National Wildlife Refuge, Baker Canyon Wilderness Study Area, Whitmore Canyon Wilderness Study Area, San Bernardino Wildlife Refuge, and the Animas Peaks. Several devastating fires have occurred within the Tombstone MOA. In 2011 Horseshoe Two Fire burned a total of 223,000 acres within the Chiricahua Mountains. Your proposal will have a catastrophic effect if a fire caused by chaff and flares were to occur. The draft EIS must thoroughly assess the wildfire risk from the use of flares and chaff. Potential mitigation measures to reduce the risk as well as realistic plans for fighting a military induced fire must be developed.

3. Potential detrimental impacts to the area's economy

Increasing low-level military training exercises in these areas is likely to be significantly harmful to local economies. Many people are drawn to the area by its natural beauty and tranquility. Birding is a very important component of the tourism economy in the region. This premier birding region attracts birders from around the world. Frankly, the tranquility of the area has already frequently been violated by military pilots who ignore regulations and come roaring up Cave Creek Canyon at low elevations. I and other community members have lodged complaints to military authorities- which are frequently denied or ignored. Any further increase in low-flying military aircraft and sonic booms is not acceptable. The draft EIS must assess economic losses to our communities. The draft EIS must also assess the social damage done to those who come to recreate in a pristine environment.

When a Draft EIS is made, it is incumbent upon the Air Force to fully consider the potential impacts to this extremely sensitive and biologically diverse area. It is imperative that you identify an alternative that will not just minimize potential environmental and economic impacts but will completely mitigate those impacts. That may mean that you must come up with an additional alternative that you have not previously identified.

Carol Comeau
Portal, Arizona