March 1, 2022

I am writing to register strong objection to expansion of the Air Force Tombstone MOA over eastern Cochise County, the Chiricahua Mountains, and the New Mexico boot-heel Peloncillos.

The Cave Creek Canyon portion of Portal AZ area on the eastern side of the Chiricahuas has amazing biodiversity unmatched anywhere else in the western United States. This is why the <u>American Museum</u> <u>of Natural History</u> established the year-round <u>Southwestern Research Station (SWRS)</u> in that very unique location. The SWRS "serves scientists, students and groups that strive to conserve the World's biodiversity and add to knowledge of the natural world" (see <u>www.amnh.org</u>) Since 1955 the SWRS has served biologists, geologists, anthropologists, graduate and undergraduate students. Scientists from the American Museum of Natural History and institutions from around the world conduct research at the SWRS, some of their studies have been ongoing for decades.

Several years ago, I attended a presentation by the resident biologist at the SWRS, Dr. Lanan. She highlighted the following astonishing richness of species in this area:

90 mammal species
370 bird species
75 reptile & amphibian species
20 bat species
1200+ plant species
60 species of butterflies
(not yet possible to estimate the huge number of other insect species)

Low level massively loud flyovers, sonic booms & jet air pollution will harm human residents as well as many of the species included in the list above; homes, properties and businesses are also likely to sustain damages. The Chiricahua area is extremely remote and is currently suffering from prolonged drought. Flares have potential to ignite massive uncontrollable burns with spread to inaccessible mountains & canyons. In 2019 at a Portal AZ/Rodeo NM community meeting, National Forest Service (NFS) leaders estimated a 2hour emergency arrival time from their headquarters to Portal. Residents were advised that lives of NFS firefighting teams would not be risked to save homes or businesses in this area (**this includes the American Museum of Natural History SWRS extensive facilities). Even a small accident could easily cause devastating irreparable damage.

While concerns listed above specify the Portal AZ Chiricahua area, the Tombstone MOA also includes critical areas in the Peloncillo Mountains, Baker Canyon Wildlife Refuge & Wilderness Study Area, San Bernadino Wildlife Refuge, and Animas Peaks.

I respectfully argue that in view of the (daily) likelihood for extreme damages to all life forms in the aforementioned locations, there should be no expansion to the MOA's over eastern Cochise County, the Chiricahua Mountains, and the New Mexico boot-heel.

Sincerely,

Deborah Herczog, M.A., M.S.N. [address redacted]