

Letter to the Editor on US Air Force Draft Environmental Impact Statement As It Applies to Tombstone MOA

It appears as if a dart were randomly thrown at a map of southeastern Arizona and southwestern New Mexico where no habitation was seen because Portal, Arizona, and Rodeo, New Mexico, are frequently absent on maps. It's easy to disregard, dispossess, and dispose of poor rural areas if one has never visited or been made aware of the area's unique ecology, geology, zoology, and biology. On a map we don't exist yet we live here and fiercely protect our biodiversity.

Cave Creek Canyon is considered by many to be one of the best and most accessible ecological classrooms in the US. Its extraordinary diversity draws professional and amateur naturalists from around the world. This area is in short "a living laboratory" and the American Museum of Natural History operates the non-profit biological Southwestern Research Station at the head of the canyon. I list a partial list of their 2024 classes:

- Bat Field Survey Training: May 30-June 6, 2024
- Bat Acoustic Training: June 10-15, 2024
- Herpetology Field Course: July 27-August 4, 2024
- Lepidoptera Course: August 4-14, 2024
- The Bee Course: August 18-28, 2024
- Trees of the Chiricahua Mountains: September 30-October 4, 2024

In addition there were birding and nature tours, among them:

- Spring Migration Birding Tours: April 21-27 and May 5-11, 2024
- Monsoon Birding and Nature Tour: September 1-7, 2024

Researchers and students use the Southwestern Research Station, and it is also opened to the public with a hummingbird seating area and a gift shop. It encourages visitors and invites the public to many of its summer talks. Community members nurture their interests by taking advantage of these outreach events.

Another community nature involvement is our Visitor Information Center (VIC) at the opposite end of Cave Creek Canyon from the Southwestern Research Station. Operated by Friends of Cave Creek Canyon in partnership with the US Forest Service, the VIC regularly posts bird and animal sightings and dispenses information about trails, roads, and events involving the canyon and the community.

Use of the website iNaturalist is encouraged by visitors and twice annual bioblitzes are sponsored. The one in April garnered 383 species from 57 observers and 1,036 observations. These observations came mostly from community members but also from students, teachers, and visitors to the canyon, another example of community activism in Cave Creek Canyon.

You should by now have a better idea of what occurs regularly in Cave Creek Canyon. Community members play an active role in preserving it, from picking up trash to maintaining trails. We are involved because we love and appreciate our Coues deer, coatimundis, ringtailed cats, collared peccaries, and myriad bird species including the Elegant Trogon, Mexican Chickadee, and Mexican Jay.

But this legacy that we have worked aggressively to protect over decades is now threatened by the DEIS which proposes to increase sorties from 3450 to 8000 per year and to lower the floor to 5000 feet above ground level for supersonic flights and 500

feet for training flights. This risible proposal will most certainly impact every biome, every animal, every bird, and every individual here. Adequate mitigations for harm to wildlife are not provided. Exclusions or avoidance areas for sensitive wilderness areas were not examined. There are statements such as:

- The noise from planes is “generally compatible with all land uses.”
- “Based on estimated noise levels, the proposed modifications and use of the MOAs would be expected to have temporary minor impacts in the form of disturbance to wildlife inhabiting land beneath the airspace.”

“Risible” because the noise from flights—let alone an increase in their number at lower floors—will most definitely impact the breeding and raising of young for the threatened Mexican Spotted Owl and the Yellow-billed Cuckoo. The blasting noise from supersonic flights frightens humans let alone birds and wildlife. I have witnessed such flights at very low levels tear through the canyon. Community members choose to forego cellphone service in some areas, gas stations, and grocery stores in order to enjoy solitude, quietness, peacefulness, birdsong, animal observation, and the joy of existing with nature.

What the Air Force is proposing is mendacious and not well thought out. The proposal to expand the size and use of the Tombstone MOA amounts to an attempt to turn an enormous area of SE Arizona and SW New Mexico into a low-elevation military training ground without regard for ecological, economic, social, and cultural impacts. The Air Force should restrict low level supersonic flight to existing training grounds, such as the Barry M Goldwater Range, which is more suited for that level of risk. To add fuel to the fire, no public hearings were held in Portal, Bisbee, Douglas, or any newly affected communities in SE Arizona, despite the significant changes to the use of the Tombstone MOA.

—Rene Donaldson
September 20, 2024