

September 30, 2024

Comment on Draft Environmental Impact Statement for Regional Special Use Airspace Optimization To Support Air Force Missions in Arizona

We, as residents and property owners of Aravaipa Canyon, and living in or closely adjacent to either Outlaw MOA/ATCAA, Jackal MOA/ATCAA, or Jackal Low MOA discussed in the Draft Environmental Impact Statement (DEIS), strongly oppose changing the overflight regulations in these areas for military aircraft. **We therefore support Alternative 1 – No action, Existing Airspace.** The Barry M. Goldwater Range (BMGR) in southwestern Arizona, which has over 7,000 square miles of airspace is a very capable and productive training range and should be used for this training. Expanding the hours of operation for BMGR, including all weekends, and more efficiently coordinating flight schedules at BMGR would provide the appropriate amount of training.

In general, Alternatives 2, 3, and 4 propose in the Outlaw and Jackal MOAs that overflights be lowered from 3,000 feet Above Ground Level (AGL) to only 500 feet AGL (or in some areas to only 100 feet AGL), allow dropping of flares to be lowered from 3,000 feet AGL to 2,000 feet AGL, and lower authorization of supersonic flights from 30,000 feet AGL to 5,000 (or 10,000 feet) AGL. Below are the specific reasons that we oppose changing overflight regulations for military aircraft in the Outlaw and Jackal MOAs.

(1) These lower overflight proposals increase the risk of **wildfires** caused by dropping flares from lower elevations something that the DEIS does not adequately address. In 2021, both the nearby Pinnacle Fire (south of the Santa Teresa Mountains) and the nearby Telegraph Fire (south of Superior) occurred before the dry lightning season, were thought to be human-caused, and military overflights dropping flares were known to have occurred in these areas. As a result, flares are thought to be the cause of these wildfires making releasing flares from a lower elevation over the Outlaw and Jackal MOAs cause more harm and a big mistake. At this point the drought in these areas, which includes wilderness forested areas, is as extreme now as it was in 2021 making wildfires a great risk.

(2) We have had times here in Aravaipa Canyon when there were many low overflights resulting in harm and very great and potentially debilitating **noise** well over 100 decibels. These proposals would increase this risk and is something that the DEIS does not adequately address. The DEIS noise analysis is deceptive because it relies on Day-Night Average Sound Level and is not the actual sound a person hears when an aircraft flies over. We live in a narrow canyon and the proposal would allow even lower overflights. Our Bureau of Land Management ranger suffered harm and lost most of her hearing for several months because of low overflights in the canyon as documented in her OSHA (Occupational Safety and Health Administration) complaint. There is no reason for low overflights over wilderness areas, and areas adjacent to wilderness areas, where recreation for hikers and protection of the environment for wildlife should be the highest priority. The Wilderness Act of 1964 was explicitly developed to preserve federally designated Wilderness Areas, such as this one, in their natural condition and free from mechanized intrusion.

(3) Lowering the level of supersonic flights, many at night, would result in harm and increase the impact of **sonic booms** on our residents and damage buildings, an impact that the DEIS does not adequately address. Additionally, sonic booms would cause harm for hikers in the Aravaipa Canyon Wilderness and birds and wildlife including bighorn sheep. Sonic booms

could cause danger for the many people who ride horseback (horses could throw their riders) and greatly disturb livestock (could cause cattle to stampede endangering both the cattle and people working them) maintained by ranchers and residents.

(4) Aravaipa Canyon has important populations of birds and wildlife and an invaluable population of **bighorn sheep** that were reintroduced at significant expense and effort by Arizona Game and Fish Department in the 1960s and again more recently (this effort is also financially supported by the Desert Bighorn Sheep Society). Bighorn sheep are part of the wilderness environment and hunted in a limited way along the Aravaipa Canyon rims. Lowering overflights would increase the disturbance to bighorn sheep behavior from noise and sonic booms and negatively affect their mating and reproduction. The effects of the noise increase on animals is a major concern and is not addressed adequately in the DEIS.

(5) Aravaipa Canyon and the region around it has many **endangered and threatened species** and other species of concern. For example, four federally listed species of birds, the yellow-billed cuckoo, southwestern willow flycatcher, Mexican spotted owl, and cactus ferruginous pygmy-owl, that breed in or frequent Aravaipa and the nearby region. Disruption of the quiet, isolated nature of this area by an increase in wildfires, debilitating noise, and sonic booms would significantly impact the continued viability of these listed species, an impact that the DEIS does not adequately address. In addition, there are five federally listed fish in Aravaipa Creek and nearby, the loach minnow, Gila chub, razorback sucker, spikedace, and Gila trout. An increase in wildfire danger and the runoff of ash could potentially result in extirpation of some of these fish, as have wildfires in other areas. Finally, the last wild Mexican wolf was killed in east Aravaipa in 1976. Mexican wolves are now expanding and might recolonize Aravaipa in the near future. Unnatural aspects of overflights causing wildfires, noise, and sonic booms are very likely to impact Mexican wolf recolonization. The effects of the noise increase on animals is a major concern and is not addressed adequately in the DEIS.

Thanks for consideration of our concerns. We again urge you to **support Alternative 1- No Action, Existing Airspace**

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