

Arizona Regional Airspace EIS
c/o Stantec
501 Butler Farm Rd., Suite H
Hampton, VA 23666

October 9, 2024

To Whom It May Concern:

This letter provides my personal comments on the Draft Environmental Impact Statement for Regional Special Use Airspace Optimization to support Air Force Missions in Arizona, which I will respectively refer to as the DEIS, and SUA Optimization.

The DEIS and its surrounding processes conspicuously lack integrity in analyses and transparency. I request that the DAF fundamentally amend the DEIS, or prepare a replacement DEIS, to seriously analyze risks of SUA Optimization while conducting all attendant actions in the EIS process with appropriate transparency.

My comments include my personal endorsement of the entirety of specific comments submitted to the DAF by the Peaceful Chiricahua Skies coalition.

Release of the DEIS was deferred by the DAF from spring to autumn during the climax of a historically volatile presidential election. The deferral of the DEIS release by the DAF severely compounded an issue of insufficient opportunity for public awareness during the brief period allotted for public comment. October 4, 2024, U.S. President Joe Biden publicly expressed concern for potential violence and national crisis surrounding the imminent election.

The DAF did not hold in-person public hearings in Tribal lands and Cochise County, the most severely affected and bandwidth-limited communities; or in Tucson and Phoenix, areas densely populated by members of the public who form the largest single stakeholder for recreational and educational use of the most severely affected public lands.

Due to these factors, I request an emergency extension of the DEIS period for public comment, to extend at least 30 days beyond the 2024 presidential election; and including in-person public hearings in the crucial locations avoided by the DAF during the current period.

Furthermore, I submit these additional comments on the DEIS and its surrounding processes:

Environmental Equity

Any risks within MOAs which overlap Tribal lands would compound historic and continuing military and military-adjacent impacts to Native Nations including conquest, forced relocation, broken treaty promises, and some Tribal lands' origins as prisoner of war camps; as well as exposure to habitual practice with combat aircraft, bombs, and other munitions, surveillance, chemical dumping, mining/transport of ore used in nuclear weapons, and mining/transport of other minerals critical for military aims, such as copper. The need for specifically military redress on this issue is further compounded by the fact that the record of service in U.S. Armed Forces by members of Native Nations is five times the national average.

As a person raised in a family profoundly defined by military identity, culture, and service; I am appalled by this issue which the proposal for SUA Optimization has made me grossly more aware of.

Serious reform concerning environmental inequity in the DEIS, and in military and military-adjacent operations more broadly, is imperative.

DAF Subterfuge

Due to DAF analysis of the region for potential use by Air Force Special Operations Command lasting *at least twenty years*, due to modern advances in research/data technology, and due to the region's extensive classifications by groups including the United States Army Fort Huachuca Sentinel Landscape partners, the Department of Defense Partners in Flight Program, the U.S. Important Bird Areas Program, the U.S. Fish and Wildlife Endangered Species Initiatives, the North American Bird Conservation Initiative, the Convention on Migratory Species of the United Nations Environment Program, and the Critical Ecosystem Partnership Fund; it is *egregiously deceptive* that the DEIS repeatedly cites irrelevant studies - *many of which are two to five decades old* - in dismissing risks of SUA Optimization.

Forthright seriousness in analysis required of the DEIS is imperative.

Psychological/Behavioral Impacts

The DEIS fails to take any look at human psychological impacts of compounding existing militarization of outdoor life in the borderlands, or at longterm ecological behavioral impacts. The DEIS does not analyze cumulative risks to species-specific communication, predation, and escape, or to ecological research, from hearing and startle effects of longterm exposure to repeated incidents of disturbance during low flyovers.

Serious analysis of psychological and behavioral impacts to humans, wildlife, and ecology from longterm exposure to repeated incidents of disturbance, and by compounding existing militarization of outdoor life in the borderlands, is imperative.

Hazardousness

The MOAs are currently used for training that is incorrectly defined as "non-hazardous". (At least ten wildfires in the Outlaw/Jackal MOAs have been ignited by DAF flares, and there are verifiable hazardous impacts longstanding within the Sells MOA). Although the DAF defines current activity within the Barry M. Goldwater Range (BMGR) as "hazardous", the DEIS states "non-hazardous" training would move from the BMGR to the MOAs, to accommodate "more hazardous" training coming to the BMGR.

An accurate and consistent definition of “hazardous” by the DAF is imperative.

AFSOC

Air Force Special Operations Command (AFSOC) has considered Davis-Monthan USAF base for transformation/beddown since at least 2005, as evidenced in numerous documents released by the U.S. Government Accountability Office (U.S. GAO). AFSOC transformation/beddown of Davis-Monthan USAF base is being proposed within the same timeframe that SUA Optimization is being proposed. The outcomes of the two proposals are undeniably connected by operational logistics.

It is disingenuous for SUA Optimization to not be more prominently affiliated with potential AFSOC operations within the DEIS, particularly due to AFSOC’s present implication in the extraordinary contamination of New Mexico groundwater, the euthanizing of thousands of New Mexico cows, and the poisoning of New Mexico residents.

Clarification of any relationship between AFSOC transformation/beddown and SUA Optimization is imperative.

UAVs/UASs

The DAF has ignored inquiries regarding future regional operation of AI-enabled and/or uncrewed aircraft. The development and operation of military UAVs/UASs is a self-proclaimed specialty of AFSOC. It is disingenuous to not clarify within the DEIS whether the “more hazardous” training in BMGR, which SUA Optimization aims to support, features development of new/experimental military UAVs; or if the DAF intends now or later for Arizona MOAs to support operation of UAVs/UASs in general.

Particularly due to public contention surrounding the development and operation of AI-enabled and/or uncrewed aircraft - for ethical reasons including automation bias, collateral damage, and model collapse; clarification on permissible regional operating areas for future use of DAF UAVs/UASs is imperative.

DAF Violations and Public Recourse

Hundreds of military combat training flights flagrantly violating existing rules over rural communities in Arizona and New Mexico have been rigorously documented by community members. Should more permissive rules be authorized, there is low community expectation they will not be surpassed.

My firsthand account and complaint of a warplane flying in negligent proximity to the iconic geologic hoodoos of Portal Peak in the Chiricahua Mountains range, buzzing a cliff containing the brooding nest of raptors presumed to be eagles, resulted in correspondence between the DAF 355th Wing Public Affairs (PA) office and myself, which was terminated by the PA office September 26, 2022. During that correspondence, the PA office gave no answers to my repeated questions regarding records related to DAF flight violations, protocol for public recourse to flight violations, and other important concerns. The PA office only asserted that military pilots do not violate restrictions, and military leaders know what they’re doing.

Clarification on DAF accountability and public recourse in cases of flight violations, and potential unforeseen impacts of SUA Optimization, are imperative.

Public and Governmental Purview

Regional organizations and community members have been requesting adequate transparency surrounding existing violations and SUA Optimization for over two years. More than six thousand substantive public comments made during scoping were ignored or dismissed by the DAF in the DEIS. Regional governmental leaders in city, state, and federal offices have recently issued official statements of opposition or requests for transparency.

DAF accountability to public and governmental purview surrounding the DEIS and Final EIS processes is imperative.

Our military service members honor the United States with their dedication. I request that military leaders, in turn, respect that dedication by honestly analyzing how duties assigned to service members impact the country they honor.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melinda Matson Spina', written in a cursive style.

Melinda Matson Spina