

To: Arizona Regional Airspace EIS % Stantec
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Comments on the Draft EIS

Sept 25, 2024

I am, and have been an Arizona resident in the Portal area since 2006. I live in East Whitetail Canyon, in the Chiricahua Mountains which is within the proposed north extension of the Tombstone training area. This canyon runs east-west and meets West Whitetail Canyon at a low saddle on the ridge top. Fighter jets, usually A10s, already use these 2 canyons for below radar flights even though they are outside the currently authorized area. Most of my comments pertain to Tombstone and the proposed northern extension.

The Draft EIS has serious omissions that present biased information to the decision maker. To begin with the maps of the training areas don't show large communities such as Safford, Globe or Douglas let alone smaller ones such as Portal, Elfrida or San Carlos. This omission gives the erroneous impression these training areas are empty of people - just like the Barry Goldwater Range. In fact, thousands of homes containing American Citizen will be greatly affected by your preferred alternative. The increased number of missions, lower elevation of flights, greater speeds and flares will affect more than a few recreationists in Wilderness areas.

Table 3.7-4 omits the Gila Box National Riparian Conservation Area (approved by the US Congress and the President). I believe the Gila River, Bonita Creek and Aravaipa Creek are included in the Wild and Scenic River system, contrary to your statement on page 3-92.

Another huge misstatement is on page 3-59 where you wrote that Arizona is mostly arid to semi arid. The EIS does not propose state-wide training but rather discrete areas, and the plant communities specifically within these training areas should be described. The Tombstone area includes multiple mountain ranges with elevation above 9,700 feet. There are hundred of thousands of acres of conifer forest, oak woodlands, chaparral and thick, productive grasslands. The Draft EIS misrepresenting the real situation and will give the decision maker the impression that only "desert" (like in the Goldwater) will be affected by the preferred alternative.

The draft plan fails to identify the roughly 25,000 Sandhill Cranes that spend approximately 5 months each year mostly in the Tombstone training area. These are big birds - 4 foot tall with 6-7 foot wingspans. They migrate into the Sulfur Spring Valley between Willcox and Douglas (neither towns shown on your maps) starting in October. Being "water birds" they are disturbed by low overflights. More important for the pilots who fly training missions is that these birds are blue-gray in color and almost disappear when seen against a blue sky. Additionally they migrate in flocks of 2 - 100 using the east-west valleys and low mountain passes over the Chiricahua Mountain range. The proposed north extension of the Tombstone area is one of the main travel route for Sandhill Cranes each fall and winter. I expect some very unhappy outcomes when birds and planes interact while both are flying through East and West Whitetail Canyons; especially since both prefer the same height above the surface.

Section 3.8.3 contradicts statements made earlier in the Draft EIS. Flights will be concentrated by topographic features. Pilots will focus on flying through canyons (as they currently do) to avoid radar. But, the canyons in the Chiricahua Mountains are where our homes are located. The proposed increased flight numbers, increased speeds and lower heights will impact us and decrease the value of our homes and property. Most people here chose this place because of the quiet rural setting. The plan statement on 3-116 is totally false. The plan describes how noise affects recreations in great detail but I found no analysis of the effects on people, like me while in our homes. To digress a bit - I am a patriot - I enlisted in the US Army in 1970 and served my Country as an infantry sergeant in Viet Nam (1st Cav. Division) in 1971-72. I chose to live where I am - 13 miles of county dirt roads and 1/2 mile of private driveway behind a locked gate for the quiet isolation. The proposed action will bring regular military flights right past and over my home. Already the A10s fly East Whitetail Canyon below the height of my home (which is 400 feet above the canyon bottom) and this triggers PTSD response. I will not be able to stay in my home if Alternative 2 is selected and will be forced to move elsewhere. I doubt I will get as much money for my house and land as I spent if military jets are roaring past. Would the lost value be considered a "taking"?

The Draft EIS does address the issue of noise, but in a totally bogus manner. Many (most?) flights are already up and down canyons where the sound is reflected off the walls and concentrated by both sides. Again, canyons are where I and my neighbors live. There are 15 homes here in East Whitetail Canyon and many times

that is Cave Creek Canyon, near Portal. The proposed North Extension of the Tombstone area is already being used by some A10 pilots (either disobeying orders or with poor navigation skills) even though it's outside the current training area. A member of your staff confirmed the current boundary location at the September 13, 2024 public meeting in Animas, NM. The biased analysis in the Draft EIS assumes flights will be evenly spaced within the training area. This is contrary to reality and seemingly designed too allow the decision maker to conclude that each location will suffer only a few impacting flights each year. In fact some location, such as where our homes are located will often be pounded. I suggest the EIS team, or the decision maker, hike a ways into Cave Creek Canyon and sit under the trees, listen to the flowing water and singing birds and at an unanticipated time have a F16 fly at the proposed height and speed above them. Then they will actually know what the impacts will be.

The analysis of the risk of flares starting fires is actually silly. Canyons such as Cave Creek are 3,000 feet deep. Dropping a flare 2,000 feet over the Canyon floor will be below the ridges on both sides. Flares will drift side ways in the erratic canyon winds. Based on my real life experiences formed by watching your pilots who don't follow procedures/orders and fly where they aren't suppose to and lower than they are suppose to - I expect regular fires getting started. And, as I pointed out earlier, the mountains in SE Arizona aren't like the Goldwater - we have thick forests and contiguous vegetation. A fire here will spread. Your draft plan acknowledges that it's the land management agencies (US Forest Service, Bureau of Land Management and Arizona State Land Department) responsibility to control the fires you ignite, (way to go Air Force !). A real problem for me is the US Forest Service has changed the policy on protecting homes adjacent to forest lands and they now exclude places like mine because of the narrow, steep driveway. They did a wonderful job protecting my house in 2011 when the Horseshoe 11 fire burned over 200,000 acres in the Chiricahua Mountain; and they spent over \$56 million containing the blaze. They won't do that again.

In conclusion, the Draft EIS does not accurately depict the affected natural environment, the human population, or the effects of the preferred or other alternatives on the human environment. While I would prefer an alternative that eliminates all lower elevation (below 5,000 feet above the surface) flights near civilian homes, no flares and no supersonic flights this isn't offered. Therefore I recommend Alternative 1 - the existing situation and will try to tolerate the pilots who go "off the reservation" and fly past my home.

Sincerely: Albert R. Bammann, 3001 W. Hilltop Rd. Portal, AZ 85632