9/18/2024

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 on the eastern side of the Chiricahuas has biodiversity unmatched anywhere else in the western United States. This is why the American Museum of Natural History established its Southwestern Research Station (SWRS) in that very unique location. Since 1955 the Research Station has served scientists, graduate and undergraduate students along with other organizations striving to add to knowledge of the natural world to preserve the World's biodiversity (see www.amnh.org). National and international scientific research studies in and around this incredible area have been ongoing for decades. Note that the SWRS also welcomes and houses naturalists & ecotourists be they individuals or groups.

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

90 mammal species
370 bird species
75 reptile & amphibian species
21 bat species
1200+ plant species
60 species of butterflies
Many other insect species in such high numbers not yet possible to estimate

Low level loud flyovers, sonic booms, and chaff pollution are all harmful to human residents & their animals as well as to many of the species included in the list above; homes, properties and businesses will sustain extraordinary impact and damage. The Chiricahua & Peloncillo areas are very remote and are 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 at least a 2 hour 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 extensive facilities at the American Museum of Natural History SWRS). Even a small accident could easily cause devastating irreparable damage. At a distance of 150 feet (45 meters) from the aircraft, the noise level is typically around 115-125 dB. This is loud enough to cause immediate and severe hearing damage if proper hearing protection is not used. Increasing the frequency of low ceiling F15 and F-35 supersonic flights make human & environmental destruction & damage an inevitable probability.

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 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,

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