

As a resident of the community of Paradise, AZ in the Chiricahua Mountains, I strongly oppose the proposed changes for the Tombstone MOA detailed in the Draft EIS for the Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona. My husband and I moved here permanently two years ago after purchasing our cabin in 2018 because of the beauty, solitude, and abundance of outdoor recreation. Although there are currently only eight full-time residents in Paradise occupying five houses, there are another 22 homes owned by part-timer residents who frequently spend time here for the exact same reasons.

I am opposed for the following reasons as the changes will lead to:

- **Lower quality of life** for residents from noise stress and loss of privacy/solitude.
- **Lower property values and county property taxes losses** from the need to disclose the fact that we now live in a combat training zone, and potential lost sales or substantial reduction in sale proceeds from that disclosure.
- **Economic harm** in terms of tourism and ranching due to extreme noise levels.
- **Noise pollution and damage to structures** from F-16 and other planes flying as low as 100 feet above ground level and sonic booms at altitudes as low as 5,000 feet.
- **Fire risks** from flares, which don't necessarily burn out below 2,000 feet or which may not ignite before hitting the ground. THE CHIRICAHUA MOUNTAINS ARE HEAVILY FORESTED, NOT A DESERT LIKE THE BARRY M. GOLDWATER RANGE.
- **Pollution and biodiversity damage** from chaff releases.
- **Risk of military aircraft crashes**, affecting people and startling horses and livestock, as well as wildlife.
- **Devastation to wildlife** and unique biodiversity in this area.

The Chiricahuas are home to the Chiricahua National Monument, which is proposed to become a national park and will be included in the expanded Tombstone MOA. In addition, these mountains contain the Chiricahua Wilderness, and there are many more protected public lands within the Tombstone MOA. Wilderness areas have been designated by Congress, and the preservation of their wild character, including such components as quiet and solitude, is a national priority established by Congress. Combat military flights are anathema to national parks, designated wilderness areas, and other protected public lands.

Furthermore, specific deficiencies in the DEIS are as follows:

- **The DEIS analysis of Noise is analytically inadequate.**
  - The DEIS relies on a measure of decibels DNL or Day-Night Average Sound Level. DNL is calculated by summing the sound exposure during daytime hours with weighted measure for nighttime hours and averaging this sum over a 24-hour day. It is an average not the ACTUAL SOUND that a person hears. DNL is not a measure sensitive to very loud, isolated events, such as an F-16 overflight, which may not even influence this measure.

- The DEIS reports some Lmax or SEL noise levels that are quite high and in a dangerous level. The CDC says “any sound that is 85 decibels or higher can cause hearing loss.” Lmax for an F-16 can be as high as 131 dB according to the Air Force. This is loud enough to cause immediate and severe hearing damage if proper hearing protection is not used.
- The DEIS uses outdated research and does not consider additional and more recent studies.
- The DEIS acknowledges that lowering the flight floor of supersonic jet flight to 5,000 feet AGL will increase the sonic boom pressure five-fold. But the flawed analysis concludes there will be no increase in negative impacts, despite the increasing evidence of broken car windshields, cracked foundations, and recorded evidence of damaged houses. The Air Force should restrict low level supersonic flight to existing training grounds more suited to that level of risk.
- **The DEIS analysis of Safety issues is analytically inadequate and does not provide adequate mitigations.**
  - The DEIS minimizes the cumulative **risk of fire** from the substantial increase in the number of flares drops permitted. References and data regarding these risks is outdated and dismisses known cases of fire caused by military training and ignores the rising threat of climate enhanced fires here. No realistic plans for fighting a flare or crash fire are included in the plan. This is a real concern as the US Forest Service has told residents of Portal and Paradise that they will not protect homes or businesses adjacent to forest lands as they did for the Horseshoe II fire in 2011.
  - With the significant increase in flights in the Tombstone MOA, there will be an increasing **likelihood of “mishaps” or crashes**. This is exacerbated by pilots “hot dogging” in the canyons and breaking regulations.
- **The DEIS analysis of Natural Resources is analytically inadequate and does not provide adequate mitigations.**
  - The DEIS dismisses possible impacts on the many **endangered and threatened species**, particularly those with critical habitat below the airspace. The analysis does not adequately project the impacts of the increasing frequency of low-level jet flight on animal behavior and fails to consider the incremental and cumulative effects on these species.
  - Research shows that a very high impact from aircraft noise may cause direct mortality, destruction of nests, and/or reduced use or abandonment of an area or nests.
  - The DEIS should consider Avoidance Zones over all wilderness areas, wildlife refuges, designated critical habitats, national park units, traditional cultural properties, and tribal lands. These alternatives and mitigations were not adequately considered.

In short, expanding military combat training over rural communities and tribal and public lands is not acceptable for the many reasons noted above. The Air Force should restrict its lower elevation and supersonic flights, and other combat training such as dropping chaff and flares, to the Barry M. Goldwater Range where it is already happening. The Air Force must not shift the burden of risk to rural and tribal communities in southern Arizona and New Mexico.

Sincerely,

Jennifer Towne  
Paradise, Arizona 85632