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TO: Arizona Regional Airspace EIS

c/o Stantec
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(Submitted via online form)

FROM: Kim Vacariu

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To Whom It May Concern:

The Draft Environmental Impact Statement for Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona has failed the people who are affected by this proposal through its lack of transparency, as specified below. **Therefore, I ask the DAF to abandon this DEIS or add the supplemental appendices indicated below, or to choose the Alternative 1 - No Action Alternative. Please note: The 30-day Comment Period extension is insufficient for the USAF to complete the noted supplements to the DEIS that must be included to meet the NEPA requirements indicated.**

1. Transparency of process and accountability in the DEIS is inadequate and ignores NEPA

The requirements of NEPA are clear: Proposals with the potential to impact the environment must be fully exposed to public scrutiny and comment, and vetted with affected agencies. The DEIS achieves neither of these basic NEPA mandates, and in some cases appears to ignore them completely in very obvious ways. I will describe here several of these many inequities and suggest solutions to correcting these basic DEIS oversights.

2. Lack of Public Participation

The primary example of this lackluster approach to NEPA is the avoidance of any realistic public scrutiny through allowing only a limited number of public hearings to occur in remote, low population areas, some of which were not even located in an affected MOA. And in the most obvious instance of NEPA avoidance, having no public hearings scheduled at all in Cochise County, AZ, the most populous and most heavily impacted by the DEIS of any county in the proposal (Tombstone MOA). An overly-optimistic plan to provide public comment opportunities via virtual format completely ignored the reality of poor internet service and unfamiliarity with virtual formats within much of the proposal's affected areas. The process of public commenting via the USAF's website was extremely poorly publicized, to the point that without local activism the massive plan would have gone basically unnoticed by the public.

ACTION NEEDED: Extend the Public Comment Period by at least 60 days to allow for expanded engagement of the affected public in population centers like Douglas, Bisbee, Tucson and Phoenix.

3. Lack of Transparency of Existing Agency and Public Input

One of the most critical aspects of the DEIS process is NEPA-required input from agencies whose management activities are impacted by proposed actions, and from the public, via pre-DEIS

scoping periods. The DEIS does not include any agency-related submissions or comments, and the USAF has delayed or refused to provide those agency comments when subjected to FOIA requests. In addition, the DEIS does not respond to, in fact ignores, all but a tiny fraction of the 6,665 public scoping comments it received. There were no changes to any of the components of the original scoping document, indicating almost an ignorance of any public concerns. Efforts to obtain further missing information in the DEIS via FOIA have been unnecessarily delayed, resulting in lawsuits to recover the information (Center for Biological Diversity).

ACTION NEEDED: Immediately provide appendices with USAF responses to all substantive public comments, and all Agency comments in a supplemental DEIS. Immediately provide all substantive information requested via previously submitted FOIAs. Extend Comment Period by 60 Days.

4. Lack of Realistic Alternatives

The DEIS fails to recognize one of the best alternatives for continuing to expand combat training operations with the least impact to the environment and communities involved.

According to the DEIS, rerouting existing combat training away from Barry M. Goldwater Range to the Tombstone MOA is intended to allow for an increase in “more hazardous” operations at BMGR. But the vast number of combat training sorties to be rerouted to the Tombstone MOA includes thousands of A-10 training missions now being flown at BMGR that will disappear when A-10s are soon retired—opening vast airspace at BMGR for new “more hazardous” operations at Barry Goldwater without any rerouting of flights to the Tombstone MOA. Why was this logical alternative ignored in the DEIS? Technically, there is no such thing as “more hazardous” combat training flights. What could be more hazardous than combat training at low elevations over the Tombstone MOA wilderness and residential areas with flares, chaff and sonic booms?

ACTION NEEDED: Restrict all low-level combat training activities to Barry M. Goldwater Range where they are already happening, and where retiring A-10s will offer large amounts of new airspace for inclusion of “more hazardous” training missions without rerouting any flights to Tombstone MOA.

5. Lack of correct analytical information

The DEIS claims that its increased combat training missions will cause “no significant impact” to communities in the Tombstone MOA. The DEIS’s lack of accurate transparency in addressing the impacts of noise levels alone is particularly obvious. The DEIS claims that there will be no increase in noise levels and no impact on tourism, property values, or wildlife. The amount of information available to the contrary of this statement is overwhelming. You don’t have to be a scientist to know that when one doubles the number of combat training missions from 3,500 to 8,000 flights annually, including much noisier F-35s — and at the same time dramatically lowers the elevation and increases the speed of those flights, that you would certainly be increasing noise levels. This blatant avoidance of accuracy is suspect to the point that it brings into question the qualifications of the technicians who wrote the DEIS. Either these statements are grossly unresearched or the USAF is overtly hiding the true impacts of the expansion from the public. That’s a clear violation of NEPA.

ACTION NEEDED: Up-to-date data on noise impacts must be immediately provided in an appendices supplement to the DEIS. Comment Period Needs to be Extended 60 Days.

6. Lack of correct analysis of Socioeconomics

The USAF video shown prior to virtual and public hearings states that “Noise levels could affect housing values,” but that statement is then contradicted in the DEIS, which states that: “Noise exposure would not be at a level expected to impact property values,” and that “it would not be expected that the Proposed Action would have any quantifiable impacts to the existing housing values within the region.”

Lack of DEIS transparency in describing the true potential impacts on real estate values is a violation of the intent of NEPA to disclose relevant factual information to the public.

Many studies show that property values are affected by noise levels. In addition to the requirement for home sellers to disclose the value-reducing fact that their properties are beneath a USAF combat training zone, a 2003 meta-analysis of property values concluded that the noise discount was about 0.50 to 0.60% per dB. “A given property located at 55 dB would sell for about 10-12 percent less if it was located at 75 dB, all other things held constant. Stated differently, under these same circumstances, a \$200,000 house would sell for \$20,000 to \$24,000 less.” (Sources: [Pennsylvania State University, 2003](#); [Abubakar Tafawa Balewa University, 2016](#).)

A research thesis by USAF Captain Melissa Johnson analyzed USAF aircraft noise and the effect on property values, concluding “it has been found that the noise being created by USAF aircraft is associated with a negative impact on local community housing values.” (Source: [Johnson, Wright-Patterson Air Force Base, 2006](#).)

The impact of noise on real estate values is now recognized by the cities of Chicago and Burlington, VT, which are both reviewing noise ordinances that would instruct county assessors to devalue real estate property taxes in high-noise areas using existing sales data for these areas. <https://oharenoise.org/sitemedia/documents/about-us/news/2016/CookCoAssessorDocs/CCAO%20Article%20Airport%20Noise%20Reductions%20Norwood%20Park%20Sun%20Times%2023Sept16.pdf>
<https://www.burlingtonfreepress.com/story/news/local/vermont/2024/09/10/winooski-burlington-airport-vermont-air-force-f-35-noise/75085503007/>

In the Tombstone MOA, Arizona statute 28-8484 requires that realtors disclose military aircraft training activity in the area. (Source: [Arizona Revised Statutes, 2024](#); [Tucson Association of Realtors, 2024](#).) Realtors and land owners in the area have expressed concerns that this will inevitably affect property values.

ACTION NEEDED: Relevant data on the effects of this proposal on property values must be analyzed and published as an appendix supplement to the DEIS; Relevant data on the biological effects of Chaff and relevant data on the threat, and actual occurrence, of ground fires caused by malfunctioning Magnesium Flares must be analyzed and published as an appendix supplement to the DEIS. Extend the Comment Period by 60 days.

CONCLUSION

The Air Force must not shift the unacceptable burden of risk in moving hundreds of dangerous combat training flights from the huge, completely unpopulated, federally-controlled airspace at BMGR to the smaller, heavily-populated Tombstone MOA which contains highly sensitive economic and biological components. This is totally inadequate risk analysis.

Expanding military combat training over rural communities and tribal and public lands is not acceptable. 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’s already happening. The Air Force must not shift the burden of risk to rural and tribal communities in southern AZ and NM.

Thank you for this opportunity to comment on the Draft Environmental Impact Statement for Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona.

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