

Senator-elect Rubén Gallego  
1114 Longworth House Office Building  
Washington, DC 20515

November 13, 2024

Senator-elect Rubén Gallego,

This is a time-sensitive public engagement inquiry regarding your knowledge of oversight at any point in the early stages of interagency communication surrounding the DAF proposals for SUA Optimization and SOW Beddown in Arizona.

Your service in the Committee on Natural Resources' Subcommittees on Indian and Insular Affairs, Oversight and Investigations, and on Water, Wildlife and Fisheries; in combination with your service in the Committee on Armed Services' Subcommittees on Intelligence and Special Operations and on Tactical Air and Land Forces, indicates you should be uniquely positioned to either illuminate or evaluate the overwhelming lack of transparent and democratic due process surrounding these two proposals.

Considering the confluence of your committee assignments, your imminent position as senator, and the thousands of comments made by Arizonans requesting immediate mitigation of the oversight surrounding these proposals; I believe you bear a responsibility to address the public on this matter.

I am formally requesting a public statement from you as a Ranking Member of the Committee on Armed Services' Subcommittee on Intelligence and Special Operations, and as Senator-elect during the brief period provided for public review and comment on the DEIS for the 492 SOW Beddown.

It is necessary that both of these DEISs be entirely revised or replaced, and resubmitted through public hearings in the affected areas including Tribal Lands, as well as the Tucson and Phoenix metro regions, whose residents together comprise the largest single stakeholder for educational and recreational use of the affected areas.

The 492 SOW Beddown DEIS includes an email comment by an EPA Environmental Review Scientist, which assumes that the Proposal for SUA Optimization supports the Proposal for SOW Beddown at Davis-Monthan, and seeks clarification on how the two proposals relate to each other.

Members of the public share this assumption, and make the same request.

The SUA Optimization proposal, still in process, was released claiming a need to meet training deficiencies due to current Arizona SU airspace being insufficient. The SOW Beddown proposal was released claiming Arizona's vast training space is advantageous to that proposed action.

This contradictory sequence is compounded by the fact there are multiple documents declassified by the Government Accountability Office which show the DAF has studied Davis-Monthan for an AFSOC transformation since at least 2005.

Other clarifications are needed for accurate public review and comment.

A year after the SUA Optimization proposal was released, DAF staff began stating a need to move training out of the Barry M. Goldwater Range, to make room for “more hazardous” training there. However, the SOW Beddown DEIS states that proposed action would reduce testing with live munitions such as rockets, missiles, and bombs in the BMG Range.

This incongruousness, together with the 492 SOW being specialized in the testing, training, and deployment of weapons for warfare categorized as “Unconventional”, “Asymmetrical”, and “Irregular”; as well as Psychological Operations, Surveillance, and Un-crewed Aircraft, suggests that DAF intent to move existing training from the BMG Range into civilian areas might be related to the possibility of testing and training next-generation AI-enabled un-crewed aircraft and other experimental weapons such as hypersonic drones for missile deployment, in the BMG Range.

That possibility is elevated by the DAF intent to couple the 492 SOW with an Air Combat Command Intelligence Squadron at Davis-Monthan AFB, a highly unique and specialized coupling in the roster of domestic DAF installations.

This matter is a serious concern for many members of the public, because we are in the earliest stages of navigating ethics surrounding AI-enabled weapons, and world leaders are urgently asking for international AI-arms talks to address serious problems such as computational bias and collateral casualties.

In addition to the very serious risks of bodily stress, chemical exposure, and wildfire to people and nature posed by the potential actions of SUA Optimization, which supports the proposed SOW Beddown, any technological militarization of civilian life would be a serious impact to self-determination, privacy, and psychological stress.

For accurate public review and comment, immediate clarification is needed - does the DAF intend for military aircraft to ever train with AI-enabled surveillance & targeting technology in any of the MOAs proposed for SUA Optimization, and will AI-enabled un-crewed military aircraft ever be operated in any of the MOAs proposed for SUA Optimization?

The confusing, contradictory, and opaque way the proposals for 492 SOW Beddown and SUA Optimization are being presented to the public includes the fact that despite a formal Freedom of Information Request, the Air Force intervened to hide from the public, comments by the US Forest Service opposing SUA Optimization due to serious wildfire danger and other risks.

The avoidance of transparent and democratic due process for these two proposals is unacceptable to many members of the public, whose trust is additionally broken because the DAF, and specifically Special Operations Command, are implicated in adjudication of serious chemical contaminations from Davis-Monthan AFB and Cannon AFB.

In your substantive relationship with related matters through your service in the Committee on Armed Services' Subcommittee on Intelligence and Special Operations, you may have become aware of the regional precedent of AFSOC terminating their Low Altitude Training Area Environmental Analysis of New Mexico airspace in 2012, because a Finding of No Significant Impact (FONSI) could not be reached due to inadequate comprehensive assessment by the DAF.

Now, Arizonans are facing a situation where not only is the DAF's comprehensive assessment inadequate; but standards of methodology and public engagement are being blatantly trampled, and crucial information from Federal agencies is being withheld and silenced.

Again, I urgently ask you to address the public regarding any previous knowledge, and your current position, regarding these matters; well before the December 9 deadline for public review and comment on the DEIS for 492 SOW Beddown at Davis-Monthan AFB.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melinda Matson Spina', with a stylized flourish at the end.

Melinda Matson Spina