



November 9, 2024

Arizona Regional Airspace EIS  
c/o Stantec  
501 Butler Farm Rd., Suite H  
Hampton, VA 23666

**Re: Public Comments on Draft Environmental Impact Statement (DEIS) for Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona.**

To Whom it May Concern,

Pursuant to the Notice of Availability for the Draft EIS for Regional Special Use Airspace Optimization published in the Federal Register (EIS No. 20240140, Draft, USAF, AZ) on August 9th, 2024, please accept the following comments on this proposed action. We are submitting these comments via the portal provided as well as by certified mail prior to the extended deadline date of November 12<sup>th</sup>, 2024, thus making them timely.

WildEarth Guardians (Guardians) is a nonprofit conservation organization whose mission is to protect and restore wildlife, wild places, wild rivers, and the health of the American West. Guardians has offices in six states, including New Mexico and Arizona, and has more than 200,000 members and supporters across the United States and the world. Our organization has over 30 years of experience implementing our vision of a world where wildlife and wild places are respected and valued and our world is sustainable for all beings. These comments are being submitted on behalf of the members of WildEarth Guardians, whose members, supporters, staff and board are concerned with the management of public lands in the United States.

The Draft Environmental Impact Statement (DEIS) for Regional Special Use Airspace Optimization (SUA) proposes modifications to ten (10) existing Military Operations Areas (MOAs) that stretch across

southern Arizona into southwest New Mexico. The proposed actions will impact the Gila, Apache-Sitgreaves, Tonto, and Coronado National Forests; this includes 12 Forest Service Wilderness Areas. Additionally, public lands managed by the Bureau of Land Management (BLM) will likely be impacted. This includes 19 BLM Wilderness Areas, eight BLM Wilderness Study Areas, 28 BLM Areas of Critical Environmental Concern, four BLM Research Natural Areas, and one BLM Riparian National Conservation Area. This is in addition to four National Wildlife Refuges, two National Monuments and the Continental Divide National Scenic Trail. Our organization and members find value and use of these areas and are concerned with the proposed actions and their impacts to the interests of our members.

Because of the risks associated with this proposed action first and foremost WildEarth Guardians is making requests of the Air Force to modify the SUA. We also object to many parts of the proposed action. The following provides a summary of those requests and points of objection:

1. Due to the facts that; a) the EIS materials were only published in the National Registrar and local libraries, b) no hearings were scheduled in Cochise County, nor within the Tombstone MOA, nor on tribal lands, c) there were no additional in-person hearings scheduled during the extension period of 30 days that was granted, d) it is very difficult for rural residents and tribal members to know about proposed actions like this EIS, e) it is difficult and unreasonable for many rural residents to be able to drive long distances to be able to participate in a public hearings f) many rural and tribal communities have limited to zero access to high speed internet, in order to make the two virtual hearings and g) the comment period extension was not promoted well and now falls just a few days after the national general election (Nov. 5, 2024) and many people in Arizona and New Mexico who will be impacted by these actions are focused on ensuring they have the information necessary to vote, and mechanism to vote established; we formally request additional hearings be held in Cochise County, Arizona, on the San Carlos and White Mountain Apache and Tohono O'odam reservations, and within the Tombstone MOA to further educate people in those areas about the action. To promote these hearings so people can be aware of the proposed action, we request the Air Force publish an announcement about the hearings in all local newspapers within 25 miles of air space that may be impacted by this project, as well as in the two largest newspapers (by readership) in both Arizona and New Mexico. To facilitate additional time for such hearings, their promotion and time for community members to comment we are requesting a second extension of 45 days.
2. The Air Force failed to properly engage tribal governments, and the Bureau of Indian Affairs. We request that you have deliberate and robust consultation with the tribal nations of the San Carlos Apache, White Mountain Apache, Tohono O'odham Nation, and Pascua Yaqui Tribe. We request you fully suspend advancement of this EIS until such consultation has occurred. Additionally, we request that tribes be given additional time (at least 45 more days) to provide consultation on the SUA DEIS. Failure to properly consult with these tribes is in violation of President Biden's Executive Memorandum on Uniform Standards for Tribal Consultation (87 FR 74479) published on November 30, 2022.
3. The Air Force already has the Barry M. Goldwater Range (BMGR) available for training missions. As stated in the DEIS, the "BMGR is one of the Nation's most capable and productive training ranges and is indispensable to the ability of the U.S. Armed Forces to produce combat-ready

aircrews.” With “approximately 1.7 million acres and over 7,000 square miles of airspace”, we believe the BMGR is the best location for the proposed Air Force training actions and request the Air Force confine all proposed training and actions related to this SUA and EIS to the BMGR. Additionally, the DEIS fails to offer a compelling reason why expanding low altitude combat training and lowering supersonic flight levels in other MOA’s is warranted, given that it states the Barry M. Goldwater Range (BMGR) could meet its training needs with the addition of weekend scheduling. As such, the Air Force has failed to clearly establish the need for this proposal. Importantly, restricting proposed actions to the BMGR will cause the least amount of impact to communities, wildlife, wilderness areas, and local soundscapes in Arizona and New Mexico.

4. We join others, including our colleagues from the Continental Divide Trail Coalition (CDTC) in opposing the expansion of the Tombstone MOA, the lowering of the floor to 100 feet AGL in the Tombstone MOA, and the lowering of the height for supersonic flight in the Tombstone MOA.
5. We strongly oppose the expanded use of flares, and at lower elevations, due to the increased potential for wildfires. Our partners of the San Carlos Apache Tribe have documented evidence of flare-causing litter in the forest, as well as evidence of multiple flare-caused fires on their lands. To our knowledge, the tribe has not been compensated for these damages. Until these past grievances are addressed, and added risks are fully analyzed, flare drops should be suspended.
6. The DEIS fails to analyze the environmental cumulative impacts, including impacts of trophic level bioaccumulation and biomagnification of polytetrafluoroethylene (also known as PFAs). We request an analysis of the impacts of PFAs from this project be conducted and shared with the public.
7. The DEIS analysis of impacts to Threatened and Endangered Species is inadequate. Despite the determination that the action “may affect” these species, we believe the proposed action will have detrimental effects on wildlife including species listed on the federal list of Endangered Species. We request the Air Force establish Avoidance Zones over all wilderness areas, wildlife refuges, designated critical habitats, national park units, traditional cultural properties, and tribal lands. Such an alternative was not considered by this DEIS, and we thus request such an alternative be analyzed.
8. In general, low-level fighter jet maneuvers and supersonic flights, which will cause sonic booms, will impact millions of acres of federal public lands that sustain ecosystems, water quality and wildlife, and are used for recreation and tourism. They will also have an effect on dozens of rural communities, and at least four tribes; Tohono O’odham Nation, White Mountain Apache Tribe, San Carlos Apache Tribe, and Pascua Yaqui Tribe. The proposed low elevation flights in this DEIS would shatter the area’s natural soundscape, stress wildlife, pets, and livestock, ruin the wilderness experience and qualities wilderness areas were set aside for, and threaten the well-being of rural and tribal communities. Releasing chaff and dropping flares over fragile ecosystems pollutes the environment and increases the risk of wildfires in a region under severe

drought conditions exacerbated by worsening climate change. For these reasons, as well as others outlined above and expanded on below, we ask the Air Force to abandon this DEIS, or minimally choose Alternative 1 - No Action Alternative.

9. The Air Force has failed to consider the cumulative effects of the impact of implementing this proposed project, in addition to the [USAF 492 SOW Beddown](#) project. The Beddown project includes development and deployment of next-generation AI enabled surveillance/targeting, hypersonic drones, and uncrewed aircraft. In particular it is not clear how the two DEIS documents released by the Air Force, the Beddown EIS and the SUA Air Force optimization DEIS interface. The separation of these two DEIS appears deceptive in nature. We ask the Air Force to provide immediate clarification on how these two proposals relate, how they will impact the effects of each and importantly their cumulative impacts of the two actions. Without doing so we believe both proposals are in violation of the National Environmental Policy Act (NEPA).

***Please see the comments below that expand background on our requests.***

A. ADDITIONAL HEARINGS AND TIME TO INFORM COMMUNITIES:

The Air Force provided 60 days for public comment on this action, and then provided an additional 30 days via an extension (published in the Federal Register on Oct. 11, 2024). While there were nine (9) In-person Public Hearings scheduled and two virtual public hearings and the EIS materials were published and provided to many local libraries, the public that will be impacted by these actions have been largely unaware of the proposed actions. Our communication with the legislative offices of Senator Kelly, and Governor Hobbs of Arizona, and Senator Heinrich and Representative Vasquez of New Mexico indicate there was a lack of communication and coordination with their offices as well. No hearings were scheduled in Cochise County, nor within the Tombstone MOA, nor on tribal lands. And there were no additional in-person hearings scheduled during the extension period of 30 days that was granted. The majority of the area impacted by this action is over rural areas. It is very difficult for rural residents and tribal members to know about proposed actions like this EIS if they are only published in the Federal Register and at local libraries. It is also difficult and unreasonable for many rural residents to be able to drive long distances to be able to participate in a public hearing. This is inequitable for persons in these areas. Furthermore, the comment period extension was not promoted well and now falls just a few days after the national general election (Nov. 5, 2024). Many people in Arizona and New Mexico who will be impacted by these actions have been focused on ensuring they have the information necessary to vote, and a mechanism to vote established. It is unreasonable under such circumstances to expect community members to be able to absorb an understanding of the proposed action and take the time to provide comments on the action, and to do so without knowing about the action. As such we request additional hearings be held in Cochise County, Arizona, with the San Carlos and White Mountain Apache, and within the Tombstone MOA to further educate people in those areas who might be impacted by the action, about the action. To promote these hearings so people can be aware of the proposed action we request the Air Force publish an announcement about the hearings in all local newspapers within 25 miles of air space that may be impacted by this project, as well as in the two largest newspapers (by readership) in both Arizona and New Mexico. To facilitate additional time for such hearings, their

promotion and time for community members to comment we are requesting a second extension of 45 days.

#### B. TRIBAL CONSULTATION:

WildEarth Guardians had previously requested additional consultation with four tribes (San Carlos and White Mountain Apache tribes, Tohono O’odham Nation, and Pascual Yaqui Tribe) as part of our comments submitted in March of 2022 (*Attachment 1*). Our understanding is that the Air Force has failed to consult with these tribes as requested despite the fact this project is proposed to directly impact the air space of these federally recognized tribal nations.

We are also aware that in March of 2022, the San Carlos Apache Tribe commented on the SUA proposal. In their letter, signed by San Carlos Apache Tribal Chairman Terry Rambler, they stated “the Tribe requests government-to-government consultation on the EIS before making a decision as to whether to support or object.” Furthermore, they noted “As to this EIS, unfortunately, the Tribe was not provided the Notice of Intent. Nor was there any considered effort to achieve the government-to-government consultation contemplated under Executive Order No. 13175 (65 Fed.Reg. 67249, Nov. 6, 2000), or the terms of President Biden’s Memorandum of January 26, 2021, on Tribal Consultation and Strengthening Nation-to-Nation Relationships, which the U.S. Department of Defense is currently seeking comments on.”

The failure to facilitate deliberate and robust consultation with tribal nations is in violation of President Biden’s Executive Memorandum on Uniform Standards for Tribal Consultation (87 FR 74479). [The order](#) published on November 30, 2022, establishes uniform minimum standards to be implemented across all agencies regarding how tribal consultations are to be conducted. Importantly, the Memorandum states the following:

- *The United States has a unique, legally affirmed Nation-to-Nation relationship with American Indian and Alaska Native Tribal Nations, which is recognized under the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions.*
- *The purpose of this memorandum is to establish uniform minimum standards to be implemented across all agencies regarding how Tribal consultations are to be conducted.*
- *Tribal consultation is a two-way, Nation-to-Nation exchange of information and dialogue between official representatives of the United States and of Tribal Nations regarding Federal policies that have Tribal implications.*
- *Consultation should generally include both Federal and Tribal officials with decision-making authority regarding the proposed policy that has Tribal implications. Consultation will ensure that applicable information is readily available to all parties, that Federal and Tribal officials have adequate time to communicate, and that after the Federal decision, consulting Tribal Nations are advised as to how their input influenced that decision-making.*

The Air Force and DOC also violate the Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships, which was published in the Federal Register on [January 26, 2021 \(86 FR 7491\)](#). The Memorandum requires agencies to submit detailed plans of action to implement the policies and directives of [Executive Order 13175](#). It does not appear that the Air Force or DOD has submitted a plan of action or subsequent reports demonstrating consistency with the policies and directives of Executive Order 13175.

The Air Force and Department of Defense (DOD) has failed to properly consult with tribes that will be affected, or whose lands will be affected by the SUA DEIS and as such should suspend advancement and implementation of the EIS until such consultation has occurred.

### C. NOISE IMPACTS:

As part of this Draft EIS for the SUA, the Air Force is proposing to lower the altitude of which planes can fly to below 5000 feet, and in some cases as low as 500 feet above ground level (AGL), and in other cases just 100 feet above the ground. Such flights shall cause sonic booms that would shatter the soundscape where they occur. Such booms will stress wildlife, pets, and livestock, ruin the wilderness experience and qualities that wilderness areas were set aside for, and threaten the well-being of rural and tribal communities. 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 public lands, including Wilderness areas impacted by this SUA, are used by people, such as members of WildEarth Guardians, that seek the experience of solitude and a natural soundscape. The proposed action will obliterate the ability of the public to have such experiences, while also degrading the characteristics of the public lands and wilderness areas.

The Continental Divide National Scenic Trail (CDNST) was designated by Congress in 1978 as a unit of the National Trails System. The CDNST and its' users will be negatively impacted by this proposed action. The *Continental Divide National Scenic Trail Comprehensive Management Plan* was approved by the U.S. Forest Service and set forth as policy in 2009. The Comprehensive Plan states that the CDNST's nature and purposes are "to provide high-quality, scenic and primitive hiking and horseback riding opportunities and to conserve natural, historic and cultural resources along the CDNST corridor." This overarching policy direction serves to implement Congress's direction in the National Trails System Act, and should be incorporated into this EIS planning direction and project proposal evaluation. In order to preserve this nature and purpose, the Comprehensive Plan also establishes guidelines for using the US Forest Service's Recreation Opportunity Spectrum (ROS) classes in management of the CDNST. The Comprehensive Plan states that, where possible, the CDNST should be located in areas with an ROS Classification of primitive or semi-primitive. To retain primitive or semi-primitive classification on a stretch of trail, evidence of humans should not be noticeable or should not draw the attention of the trail user.

Lowering the existing flight floor in multiple MOAs such as in the Tombstone MOA from 500 feet AGL to 100 feet AGL, or in the Reserve MOA, and authorizing supersonic flights as low as 5,000 feet increases risks to hikers of the CDNST. Such startlingly low direct overflights, or noise from supersonic flights will make human impact very noticeable, threatening the primitive and semi-primitive nature and ROS classification of the CDNST in that area. It could also be dangerous and cause hikers to be startled and become injured. This could be especially true for visitors who are not from the region and not expecting Air Force training missions. The DEIS reports some Lmax or SEL noise levels that are high and of a dangerous level. The CDC says “any sound that’s 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, exemplifying the danger such flights can cause to recreational users of the areas impacted by the SUA, including hikers of the CDNST.

Additionally, the [Arizona National Scenic Trail](#), designated by Congress in 2009 as a unit of the National Trails System, has similar language, identifying the trail as a crown jewel of Arizona’s recreation economy. The Arizona National Scenic Trail lies directly within the Outlaw MOA. Our partners at the Arizona Trails Association have a veterans healing program, and several of their members have reported triggering events from low-level flyovers over segments of the Arizona National Scenic Trail, which is counterproductive to healing the traumas of our servicemen and women.

Lastly, the DEIS analysis of Noise is inadequate and misleading. 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. To try and hide the actual sound impact by averaging over time is misleading (as well as ridiculous) as it is not reflective of sound impact when a person, or animal hears the sound. DNL does not measure very loud, isolated events, such as an F-16 overflight.

#### D. WILDFIRE RISK:

The Air Force is also proposing to authorize the dropping of flares and chaff bundles containing up to 5 million aluminum-coated silica fibers at low elevations. While it is purported that the flares are to burn out prior to landing on the ground there have been multiple events where these flares have caused wildfires and injured people. The injuring of US citizens and our public lands is not acceptable “collateral damage” for Air Force training.

The DEIS claims that “The probability of a single flare starting a fire cannot be predicted to any level of statistical significance, particularly since it would depend on so many variables as to be totally situationally dependent. If a burning flare reaches the ground or the canopy of a tree or shrub, it may or may not start a fire.” (DEIS p 3-20); and that “The conditions that must be satisfied in order for a fire to start and spread include: (1) the source must be very near to or in contact with a fuel element, (2) the source must have sufficient residual energy to ignite the fuel element, and (3) fuel conditions must support the spread of fire.”

The entire region where the proposed action is to occur is in an arid region that is naturally drought prone and meets such conditions. The idea that a drought prone region does not provide the conditions necessary to start and spread a fire is laughable. According to the [Arizona Department of Water](#)

[Resources \(AZDWR\)](#) “Drought is a prolonged period of below-average precipitation severe enough to negatively impact the environment and human activities. Drought is a natural occurrence and Arizona is especially sensitive to drought, since water is scarce here even during average years. Population growth continues to increase demand for water. Drought can impact domestic water supplies, ranching and farming production, vegetation, forest health and wildlife populations.” Furthermore, “Arizona has been in some stage of drought since 1994, according to statewide precipitation patterns.” Using the [AZDWR Interactive Drought Dashboard](#), it is easy to see that since 2000, every county where this proposed action is to occur has faced drought, with all having Severe (D2), Extreme (D3), or Exceptional (D4) Drought every year. The dropping of hot flares in the MOA’s as proposed is simply not compatible with the environmental conditions of these areas. The US Forest Service is having to invest hundreds of millions of dollars to execute their [Wildfire Crisis Strategy](#) to reduce the impacts of wildfire on resources and communities. Here, the Air Force is proposing to invest in potentially igniting fires, creating a conflict with the Department of Agriculture and US Forest Service. Additional analysis of potential for impacts of the action, including the potential for causing a wildfire, are needed.

Note, it is highly likely that the 2021 Telegraph fire, which burned nearly 200,000 acres, was caused by dropping of flares during similar military training. Fire Commanders of the Telegraph Fire stated there was a high probability that the fire was caused by military training flares. Additionally, the San Carlos Apache Tribe has documented at least 10 fire events between 2004 and 2021 caused by flares. The tribe has stated, “These flares-caused fires were responsible for damaging 21,163.7 acres.”

The information and data referenced in the DEIS regarding wildfire risk are outdated, dismiss known cases of fire caused by military training and importantly ignore the increased threat of climate enhanced fires in an area plagued by drought. Additionally, no realistic plans for fighting a flare or crash fire are included in the plan. With the proposal for flights to occur at lower altitudes there is an increased risk of accidents occurring, including plane crashes. Additionally, we are aware that FAA regulations regarding overflights of persons, vehicles, or structures in un-congested areas by 500 feet (14 CFR § 91.119, 2024) have occurred. Such dangerous actions further increase possible crashes. The DEIS does not adequately analyze the direct and cumulative impacts of a potential wildfire that could be caused by flares or a crash. Nor is there any information that indicates there has been communication and coordination with the US Forest Service regarding the proposed actions, or the potential impacts of wildfire and resources required to address a wildfire caused by flares or a plane crash. Increasing the use of flares significantly, such as in the Tombstone MOA, while simultaneously lowering the height from which the flares are dropped, will increase the risk of wildfire in this area despite the arbitrary and capricious determination in the DEIS that “the increased number of flares proposed does not directly correlate to an increased fire risk.” (DEIS p. 3-21).

#### E. ENVIRONMENTAL IMPACTS:

The geography covered by the SUA DEIS is host to dozens of endangered and threatened species (E&T). This includes but is not limited to Mexican wolf, southwestern willow flycatcher, Mexican spotted owl, Chiricahua leopard frog, Yaqui chub and yellow-billed cuckoo. Table 3.6 -1 of the DEIS identifies the



Federally Listed Wildlife with Potential to Occur Below the MOAs. Table 3.6-2 identified the species with Critical Habitats Occurring Below the MOAs.

The DEIS is woefully inadequate in its analysis of impacts to wildlife and E&T species. 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. Extreme sound disturbances can cause direct mortality, wildlife to abandon habitat including nest or roost habitat, impact their ability to reproduce, access food, and raise young.

According to the Air Force itself (Effects of Aircraft Noise and Sonic Booms on Domestic Animals and Wildlife: A Literature Synthesis (June 1988); "Aircraft noise and sonic booms have been implicated as a cause of lowered reproduction in a variety of animals." Also, "[F]ield studies indicate that the reproduction of wild populations may be more affected by noise disturbance than domestic populations. The reproductive effects have primarily been the result of disturbance of the animal's behavior during the reproductive cycle." This Air Force document also states, "Birds appear to be more affected behaviorally by a sonic boom than domestic mammals (Casady and Lehmann 1967; Bell 1972; Ewbank 1977; Cottureau 1978). Investigators have been particularly concerned about the potential adverse effects of aircraft noise and sonic booms on the behavior of wild breeding birds, which ultimately could disrupt their reproductive cycle. In addition, a bird startled during incubation could inadvertently knock an egg out of the nest."

While the DEIS states, "Although the concerns listed above have been raised in the literature and examples have been documented, studies of unconfined wildlife and domestic animals to overflight by military jet aircraft at 500 feet AGL or higher have not shown measurable changes in population size or reproductive success at the population level or other significant biological impact (Manci et al. 1988; Bowles 1995a; Dufour 1980)." The DEIS for the most part disregards impacts to individuals, and sub-populations. Furthermore, the terms "assumed", "may" and "unlikely" are used a great deal in the DEIS. Yet, the DEIS concludes that activities are ok to occur based on assumption that they may not have effects or impacts, or because they are unlikely. These conclusions are thus arbitrary. On page 3-83 of the DEIS, it is stated as related to small mammals, reptiles, fish, amphibians, and invertebrates; "...data largely suggests that these groups experience little harmful effect from aircraft noise and therefore these species are considered to experience no effect from the Proposed Action." If 1 is greater than zero, how is little effect equal to no effect? The amount of decisions made in the DEIS that lack data to support said decisions are astounding. The majority of descriptions of analysis of impacts to Special Status species is no greater than one paragraph. While the DEIS notes "it is difficult to generalize animal responses to noise disturbances across species and more work is needed to determine if noise adversely impacts wildlife" (DEIS P. 3-77), it nonetheless determines that the effects of the proposed Aircraft Noise on wildlife will be only "temporary minor impacts" (DEIS p. 3-80); and that "There are no significant impacts to natural resources." (DEIS p. 3-90). We do not believe there has been adequate studies to result in the conclusions made in the DEIS, and thus the conclusions are arbitrary and capricious.

As related to the chaff and flares, the DEIS states that "The use of chaff and flares does not affect water quality or aquatic habitats," and "There are no activities proposed that would impact the geology,

topography, or soils in the affected environment. The use of chaff and flares does not affect soil chemistry.” However, the DEIS also says that flares are made of “magnesium and Teflon” (DEIS p. 3-20). Teflon is also known as polytetrafluoroethylene, which is widely identified as [Per- and polyfluoroalkyl substances](#). These are also known by their acronym PFAs. PFAs compounds are known to not degrade easily in the environment and are commonly known as “forever chemicals.” These chemicals have been shown to pollute soil, especially when burned, which is obviously the case with flares (International Chemical Secretariat, 2022; Citizens for Safe Water Around Badger, 2024). PFAs are widely regarded as presenting environmental hazards to both water and soil as documented by the EPA and others (EPA, 2024). The DEIS does not mention the term “polytetrafluoroethylene” nor “PFAs”. While Appendix F. does mention polytetrafluoroethylene there is zero analysis of the impacts of dropping PFAs materials over wilderness areas, hunting grounds, and waterways that provide drinking water for a huge swath of the American southwest. Chaff can contain PFAs and also presents dangers to water, soil, wildlife and natural resources. A 2023 DOD report discloses that PFAs including “about a dozen fluoropolymers, including fluoroelastomers, are ingredients in polymer bonded explosives, pyrotechnics, and propellant components used in munitions, decoy flares, and chaff” ([U.S. Department of Defense](#), 2023). The lack of analysis of impacts of knowingly polluting the environment with PFAs chemicals, fails to address the potential for cumulative and long-term effects of bioaccumulation and biomagnification of PFAs. We demand such analysis be conducted. Without such an analysis we believe the proposal must be abandoned due to potential environmental impacts due to release of PFAs into the environment.

#### F. WILDERNESS CHARACTERISTICS:

This proposed action will impact the following Wilderness Areas, and put these Wilderness Areas and the characteristics for which they have been designated as Wilderness in jeopardy; the Gila and Blue Range Wildernesses in New Mexico; and the Superstition, Salt River Canyon, White Canyon, Needles Eye, Aravaipa Canyon, Galiuro, Santa Teresa, Fishhooks, Bear Wallow, Escudilla, Mount Baldy, Chiricahua, Arrastra Mountains, Tres Alamos, Rawhide Mountains, Harcuvar Mountains, Swansea, East Cactus Plain, Harquahala Mountains, Aubrey Peak, Upper Burro Creek, Hummingbird Springs, Organ Pipe Cactus, Cabeza Prieta, Coyote Mountains, Big Horn Mountains, Baboquivari Peak, and Pajarita Wildernesses in Arizona. It also will threaten the Blue Range Primitive Area (the only remaining Primitive Area in the US) and many Wilderness Study Areas.

While the 1990 Arizona Desert Wilderness Act allows for military overflights in some Wilderness areas, it does not give the Air Force a free pass to abuse and damage all Wilderness wherever it pleases. We request an analysis be conducted that analyzes an alternative that excludes training over established Wilderness areas. We do not believe the proposed action should occur over Wilderness areas which is another reason we implore the Air Force and DOD to choose the No Action Alternative.

#### G. CARBON EMISSIONS AND CLIMATE IMPACTS:

As global temperatures hit new highs and the effects of climate change bear down on our planet, communities from all over the globe, along with scientists and environmental groups are stepping up pressure to force armies to disclose all their emissions and end long-standing exemptions that have kept

some of their climate pollution off the books. A lack of reporting and significant data gaps means it is inherently difficult to estimate the total greenhouse gas (GHG) emissions of our military agencies. Nevertheless, the available data indicates this contribution could be very large. This proposed action is a perfect example of the need for a clear understanding of the impacts of increased carbon emissions from military training operations. Among the world's biggest consumers of fuel, militaries account for 5.5% of global greenhouse gas emissions, according to a 2022 estimate by international experts (Climate and Environment Observatory, 2022). The Southwestern United States is warming and drying faster than almost anywhere else in the continental U.S. due to climate change, and communities and ecosystems here are experiencing the effects of these changes. The Air Force cannot be exempt from being held to account for their GHG contributions. And the public should have access to information regarding the potential climate impacts of this SUA Optimization proposal. The lack of analysis of the impacts of increased carbon emissions on the environment fails to address the potential for cumulative and long-term effects and contributions to the main drivers of climate change. We demand an analysis of the climate impacts of the proposed action be conducted. Without such an analysis we believe the proposal must be abandoned due to potential environmental impacts due to increased GHG emissions.

#### H. CUMULATIVE EFFECTS:

The Council on Environmental Quality's (CEQ) regulations (40 CFR §§ 1500 - 1508) implementing the procedural provisions of the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. §§ 4321 et seq.), and as of 11/06/2024 define cumulative effects as:

*Cumulative effects, which are effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from actions with individually minor but collectively significant effects taking place over a period of time.*

As noted in the CEQ NEPA Chapter 1 - [Introduction to Cumulative Effects Analysis](#). Cumulative effects result from spatial (geographic) and temporal (time) crowding of environmental perturbations. The effects of human activities will accumulate when a second perturbation occurs at a site before the ecosystem can fully rebound from the effect of the first perturbation.

According to U.S. Environmental Protection Agency's document [Consideration Of Cumulative Impacts In EPA Review of NEPA Documents](#) (1999); "Cumulative impacts result when the effects of an action are added to or interact with other effects in a particular place and within a particular time. It is the combination of these effects, and any resulting environmental degradation, that should be the focus of cumulative impact analysis. While impacts can be differentiated by direct, indirect, and cumulative, the concept of cumulative impacts takes into account all disturbances since cumulative impacts result in the compounding of the effects of all actions over time. Thus the cumulative impacts of an action can be viewed as the total effects on a resource, ecosystem, or human community of that action and all other activities affecting that resource no matter what entity (federal, non-federal, or private) is taking the actions."

The [Executive Summary of the 492nd Special Operations Wing Beddown at Davis-Monthan Air Force Base Draft Environmental Impact Statement](#) (*hereafter Beddown*) states “AFSOC aircrews would use airspace over areas in Arizona and New Mexico, including special use airspace. No new special use airspace would be created and no modifications to existing special use airspace are being proposed due to this Programmatic Basing Action.” It further states that “Potential impacts could include impacts to noise, air quality, soil and water resources, biological and cultural resources, socioeconomics, infrastructure, and hazardous materials and hazardous waste.” Clearly the actions proposed in the Beddown are known to the US Air Force. The proposed action of Beddown includes a) moving the “492 SOW, located at Hurlburt Field, Florida, is being transformed into an Air Force Special Operations Command (AFSOC) Power Projection Wing (PPW) that is proposed to be relocated to Davis-Monthan Air Force Base (AFB), Arizona”, and b) the Power Projection Wing (PPW) “would include the 492 SOW, 492nd Theater Air Operations Squadron, 6th Special Operations Squadron, 6th Special Operations Aircraft Maintenance Squadron, an unnamed MC-130J Special Operations Squadron, an unnamed MC-130J Special Operations Aircraft Maintenance Squadron, 319th Special Operations Squadron, 21st Special Tactics Squadron, and the 22nd Special Tactics Squadron.” The activities are to occur at the Davis-Monthan Air Force in Pima County, AZ, and it appears the DEIS targets the impacts of the action on only the Airforce base and immediate vicinity. There appears to be no analysis of the actual impacts of the associated mission related to the moving of said aircraft and associated missions to Arizona. As the Beddown project would use airspace over areas in Arizona and New Mexico, it is possible, and likely, although not clear that these missions may use the same airspace as this proposed DEIS for Regional Special Use Airspace Optimization. Because of the lack of clarity on the relationship between Beddown and the Special Use Airspace Optimization, we request the Final EIS clarify the relationship of the two. If there is any relationship between the two it is incumbent upon the Air Force to analyze the cumulative effects of the Beddown action and associated missions as related to the Special Use Airspace Optimization action to meet the requirements of cumulative effects analysis of NEPA as noted above.

#### CONCLUSION:

The communities, landscapes and wildlife that will be impacted by this action in Arizona and New Mexico have the right to exist and thrive. For the health of the entire Greater Gila region, and due to the lack of analysis of the impacts of this proposed action, we oppose the proposed modifications to Military Operations Areas over southeast Arizona and southwest New Mexico and ask the Air Force to rescind the proposed action, or implement the proposed No Action Alternative.

Please note that we would like to receive notification of when the Final EIS and Record of Decision is available. Please send to: Andrew Rothman, WildEarth Guardians, 3798 Marshall St., Suite 8, Wheat Ridge, CO 80033, and via email to [arothman@wildearthguardians.org](mailto:arothman@wildearthguardians.org)

Thank you,

A handwritten signature in black ink, appearing to read "Andrew Rothman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrew Rothman  
Wild Places Program Director  
WildEarth Guardians