



United States
Department of
Agriculture

Forest
Service

Southwestern Region
Regional Office

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File Code: 1950
Date: February 25, 2022

Sir/Madam
Arizona Regional Airspace EIS
501 Butler Farm Rd., Suite H
Hampton, VA 23666

Dear Sir or Madam,

The Southwestern Region of the USDA Forest Service appreciates the opportunity to comment during the official scoping period regarding the proposed action to further optimize Military Area Operations (MOA's) Tombstone, Outlaw, Jackal, Reserve, Morenci, Bagdad, Gladden, Sells, Ruby, and Fuzzy used by aircrews stationed at Davis-Monthan Air Force Base, Luke Air Force Base, and Morris Air National Guard Base in Arizona.

We acknowledge the changes that have occurred in the technological aspects of air combat and aircraft since the late 1990's when the first EIS was produced, and the need for pilots to train to meet the USAF mission in defense of the Nation. The Gila, Tonto, Coronado, and Apache-Sitgreaves National Forests look forward to continuing to work with the USAF on MOA operations.

We in the Forest Service also have our mission to manage the lands the public has entrusted to us. Understanding we do not have authority over the airspace above the four National Forests, we would like to make you aware of some key issues in the proposed action for modifying operations over National Forest System (NFS) lands.

- **Fire-starts** – One of our primary concerns with lowering the altitude for operations is the increased chance for fire starts from flares that do not immediately extinguish. While most might go out, lowering operations to the proposed altitudes measurably increases the chance that flares may not extinguish before hitting the ground. The NFS lands of the Southwest are very susceptible to fire starts, especially under the drought conditions common in the MOA areas. As you are aware, under the right conditions a flare or spark can cause a major wildland fire. Together we need to take all precautions against a wildland fire event.
- **Fire Operations** – Lowering the altitude of operations to the levels proposed in the MOAs over NFS lands creates a grave safety concern to the Forest Service whereby pilots may cross areas where aerial fire operations are occurring. Wildland fire and prescribed fire operations require a host of aerial support. There can be several aircraft in the air at once, most are flying at low altitudes and are not necessarily tracked by Federal air operatives. This poses a risk to aerial fire operations and to your pilots, if they suddenly come upon these operations, a risk neither of us can take.
- **Recreation experience** – The proposed low level sonic flights would diminish recreationists' solitude experience. Under the Wilderness Act of 1964, areas were established for the preservation and protection of public lands in their natural condition and as a place of refuge where the public can enjoy an untrammeled natural setting. The opportunity for the public to



experience places such as Wilderness areas was important enough to establish these lands as such. Forest Service Manual policy 2326.03(3) directs us to discourage flights over wilderness within 2,000 feet of the ground surface, except in emergencies or for essential military missions. The question then arises as to whether the operations are essential, and whether perhaps the training can be effective elsewhere to preserve the experience these lands provide. While there is no provision to not allow for low level flights, the 2,000-foot level at a minimum, is a standard that has been accepted and promoted by the FAA and NOAA. Even at that altitude the noise produced from sonic travel at the lower levels proposed would affect the primitive natural setting recreationists come to the Wilderness and Forest Service lands to enjoy.

- **Wildlife effects** - The increase in noise from the lower-level sonic flights may likely disrupt wildlife, including some threatened and endangered species. The sudden loud noises could have a negative effect for specie success and survival, especially during breeding season. The effects from the low-level flights should be examined and mitigations should be considered to reduce these effects. Effects from chaff accumulation should be considered, especially in areas of limited or confined threatened, endangered, or sensitive species habitat, or confined aquatic habitat and limited or avoided.

As land managers we believe the best solution to avoid these key issues would be to select the No Action Alternative which would not allow for the lowering the supersonic authorization flight levels. We do realize however that the USAF may continue pursue the proposed action and alternatives. As such, we believe we can contribute by providing insights, ideas, and information in how to potentially mitigate some of the effects associated with the key issues raised.

Therefore, pursuant to 40 CFR 1501.8, the Southwestern Region of the USDA Forest Service requests to be a cooperating agency for the Special Use Airspace Optimization to Support Air Force Missions in Arizona Environmental Impact Statement. We would then participate in the NEPA process at the earliest practicable time and assist matters within our jurisdiction by law and special expertise.

We encourage continued engagement on the Special Use Airspace Optimization to Support Air Force Missions in Arizona Environmental Impact Statement between the USAF and the USDA Forest Service. The following are points of contact for each National Forest and the Southwestern Region:

Forest	Point of Contact	Title	Email Address
Apache-Sitgreaves National Forests	[REDACTED]	Forest Aviation Officer	[REDACTED]
Coronado National Forest	[REDACTED]	Natural Resource Staff Officer	[REDACTED]
Gila National Forest	[REDACTED]	Environmental Coord.	[REDACTED]
Tonto National Forest	[REDACTED]	Fire, Fuels & Aviation Staff Officer	[REDACTED]
Southwestern Region	[REDACTED]	Director, Fire & Aviation Management	[REDACTED]

Southwestern Region	[REDACTED]	Director, Ecosystems Planning & Physical Resources	[REDACTED]
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Please send add all the contacts to your mailing list in regard to the EIS and reach out to [REDACTED] in response to the request to be a cooperating agency.

All of us in the Southwestern Region look forward to providing meaningful input as you continue with the EIS process for the Regional Special Use Airspace Optimization to Support Air Force Missions proposal.

Sincerely,

[REDACTED]

Regional Forester

cc:

[REDACTED]