

Referred to DAF

From: Haskins, Wendy - FS, NM <wendy.haskins@usda.gov>

Sent: Saturday, February 3, 2024 4:10 PM

To: KEESLING, GRACE E CIV USAF AFMC AFIMSC/CIET <grace.keesling.1@us.af.mil>

Cc: Thiel, Chris - FS, AZ <Christine.Thiel@usda.gov>; Mizuno, Lisa - FS, NM <Elisabeth.Mizuno@usda.gov>; Mandell, Andrew - FS, AZ <andrew.mandell@usda.gov>; Cox, Sean - FS, AZ <sean.c.cox@usda.gov>; Nuttall, Jacob - FS, NM <jacob.nuttall@usda.gov>

Subject: [Non-DoD Source] RE: ACTION: Interim Draft Arizona Airspace EIS for Review - NEW SUSPENSE 5 February

Dear Grace Keesling, GS-13, DAF,

Thank you for the opportunity for the USDA Forest Service Southwestern Region to provide early comments as a cooperator for the Draft Arizona Airspace EIS.

Enclosed is the collective response. Please feel free to reach out to us with any questions or thoughts about the comments.

We look forward to continuing to serve as a cooperator for the Arizona Airspace EIS and partner with the USAF during implementation.

With Sincerity,
Wendy Jo Haskins



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Director Ecosystem Resources & Environmental Planning
USDA Forest Service Southwestern Region
c(b) (6) [REDACTED]
wendy.haskins@usda.gov

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Common Comment and Response Worksheet (Version 3)

Date		Please reference the actual page number (i.e., 2-5, 3-46, etc.) NOT the pdf page number					Interim Draft EIS (Version 2) – January 5, 2024	FA8903-16-D-0032/TO FA8903-19-F-0086
Item	Commenter	Section	Page	Para	Line	Class	Comment	Response
1.							1. Avoid cross-referencing comments, do not refer to a previous comment# or state “see above”. All comments will be consolidated, and this reference will be inaccurate. 2. Contact the AFCEC PM if you have a question, do not insert questions as a comment. 3. Designate if a comment is “global” and only add it once. Avoid duplicate comments within your organization. 4. Reminder – comment matrices will be included in the Administrative Record.	
2.	Sean Cox Fire & Aviation Officer Coronado NF	Global					The Coronado NF Fire staff are aware of the operating minimums in designated range MOA’s, and minimum floors outside of said range and MOA locations. We appreciate the integration and use of the fire danger rating products in the Central Scheduling Enterprise program. We invite schedulers to routinely communicate and seek clarification on National Fire Danger Ratings with local federal fire dispatch centers; or at a minimum, with the Southwest Coordination Center based in Albuquerque, New Mexico. Standard Operating Procedures can easily be identified to make this a best practice with minimal impact to a schedulers’ workload. An easy graphic to demonstrate the susceptibility to fire starts throughout the calendar year is the utilization of the “pocket card for Southeast Arizona,” as shown in this example below (last page of this document)	
3.	A. Dahlby Wildlife Biologist Coronado NF	3.6.2.3 Special-status Species, Federally Listed Species	3-65	Table 3.6- 2	1		If the reason you are not including critical habitats for reptiles, small mammals, amphibians, fish, and invertebrates is same reason as listed on page 3-63, lines 19-21, then suggest stating that here.	
4.	A. Dahlby Wildlife Biologist Coronado NF	3.6.2.3 Special-status Species, Federally Listed Species	3-66	Ocelot and Jaguar	18-26		These two cat species occupy very similar habitats in AZ and NM, and those habitats are not as you describe them in the EIS (e.g., lowland wet communities does not accurately represent habitat where these species have been documented in SE AZ and SW NM). Suggest mentioning designated critical habitat in the jaguar paragraph (see Mexican spotted owl).	
5.	A. Dahlby Wildlife Biologist Coronado NF	3.6.2.3 Special-status Species, Federally Listed Species	3-66	Yellow-billed Cuckoo	27-34		Similar to jaguar and ocelot, the habitat description for this species does not reflect habitat used in SE AZ and SW NM. Suggest mentioning of designated critical habitat in this paragraph (see Mexican spotted owl).	
6.	C. Thiel NR Staff Officer Coronado NF	3.6.3 Environmental Consequences to Natural Resources	3-68	3	18-20		Replace “FAA” in this sentence with “USFWS”: <i>FAA defines significance threshold for actions likely to jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat.</i>	
7.								

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8.	Lisa Mizuno, NEPA Gila NF	3.2.2 Affected Environment	3-7		1	A	There is an inconsistency in the figure based on description of the Affected Environment on page 3-5 lines 31 to 38 which describes which MOAs would address impacts to airports and civilian aviation due to horizontal and vertical changes. The figure addresses the Outlaw and Jackal MOAs and includes the Reserve and Morenci MOAs. The inconsistency is showing air strips and helispots in the Reserve and Morenci MOAs. Either remove those features from the two MOAs or for more consistency, include the same features in the New Mexico portion of MOAs	
9.	Lisa Mizuno, NEPA Gila NF	3.4.3.4	3-39		12-17	M	Understand noise does not reach levels for FAA reporting or analysis for the Reserve and Morenci MOAs on the Gila National Forest. Supersonic Noise Exposure for Alternative 2 (as well Alternative 3 and 4) at the proposed flight level changes is new and does increase noise levels above subsonic noise levels. As stated in the Gila National Forest scoping letter (dated February 2, 2022), the value and character of solitude of the Gila and Blue Range Wilderness areas is very important to forest users. These areas are of extreme quiet with little human activity. There is the potential for more public concern, disagreement, and comments on proposed supersonic flight levels and potential impacts of sonic booms over wilderness areas. But overall, the lack of including or acknowledging the presence of the Gila and Blue Range Wilderness areas within the text or figures is concerning. Request additional mitigations for Wilderness areas.	
10.	Lisa Mizuno, NEPA Gila NF	3.6.3				C	The entire section lacks analysis of effects or impacts to wildlife species from overpressure or pressure waves generated from sonic booms	
11.	Sandra Taylor, Wildlife Biologist Gila NF	3.6.2.3 Table 3.6-2	3-65		1	M	Add to table 3.6.2 designated critical habitat for spokedace and loach minnow which is located within the Reserve MOA.	
12.	Sandra Taylor, Wildlife Biologist Gila NF	3.6.3.2	3-76		14, 15	S	The Mexican gray wolf is an experimental population. Replace the determination of “may affect but is not likely to adversely affect” with “not likely to jeopardize”.	
13.	Sandra Taylor, Wildlife Biologist Gila NF	3.6.3.2	3-76 3-77		32-43 1-5	M	In the Final Recovery Plan for the Southwestern willow flycatcher (August 2002), it mentions that SWFL are sensitive to vibrations. Impacts of pressure waves (vibrations) caused by sonic booms should be considered in the analysis for effects to the species.	
14.	Lisa Mizuno, NEPA Gila NF	3.6.3.2	3-77		21-34	C	Sonic boom sudden noise and pressure waves on breeding Mexican spotted owls should be assessed. On line 22, study states there is a different response by owls to “events such as thunderstorms” compared to normal overflights.	
15.	Lisa Mizuno, NEPA Gila NF	3.7.2				M	There is concern that ownership and recreational areas are not being displayed for the Reserve and Morenci MOAs like the other MOAs displayed in Tables 3.7-1 to 3.7-3. Understand that these are not included due to not having proposed changes in the horizontal or vertical expansions or noise levels. There is the potential for more public concern, disagreement, and comments on recreational	

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							uses and opportunities in relation to assessed impacts and effects of the proposed changes, especially within the Gila and Blue Range Wilderness areas	
16.	Lisa Mizuno, NEPA Gila NF	Appendix L2				M	The Gila National Forest would like to be able to review the BA and USFWS response for this project. The Mexican spotted owl is one of the species of forest concern due to the impacts to PACs, critical habitat, and recovery habitat within the Upper Gila Mountain Ecological Management Unit from previous fires.	
17.	Ronald Turner Trails and Wilderness Coordinator Tonto NF	Recreation				M	Concern is NF mandate to protect wilderness character. Low level flight detracts from wilderness character and diminishes our user’s wilderness experience. The area on the flight maps I am most concerned about is Outlaw as it contains two of our wilderness areas. The Superstitions and Salt River Canyon. To reduce the flight deck to for supersonic travel while also increasing the amount of flare use in combination of also lowering flight levels for flare training to 2000 feet above ground level would have a negative impact on our wilderness To add to my concerns, I have witnessed low level flights by the military in both Four Peaks Wilderness and the Mazatzal Wilderness over the last few months. Each time at very high speeds and seemingly low altitudes. This may be a good time to get those concerns addressed as I don’t see an MOA that includes either of those locations. I have zero issues with and flights taking place outside our wilderness areas. Regional Office Note: perhaps recognizing designated wilderness areas as special places and having some additional mitigations could help reduce concerns for noise and solitude. An example would be for pilots to try and avoid sonic booms when flying over a designated wilderness area. Others may include timing etc. if appropriate.	
18.	Andrew Mandell Fire Staff Officer Tonto NF	Global					From fires perspective our concerns are captured in the draft response very well. Regional Office note: The USFS would like to invite the bases to consider establishing ways to engage with the USFS Fire & Aviation staff at each Forest and Regional Office for up-to-date status on fire conditions and operations.	
19.	L Atkinson NR Specialist	3.10.2.2	3-104		25	A	Oak Flat, not Oak “Flats”	
20.	L Atkinson NR Specialist	3.10.2.2	3-104		27	A	The National Register of Historic Places Form for <i>Chí’chil Bitdagoteel</i> (Oak Flat) submitted on September 22, 2014, not 1994	
21.	L Atkinson NR Specialist	4.0 References	4-5		36	A	Year 2014, not 1994	
22.								
23.								
24.								
25.								

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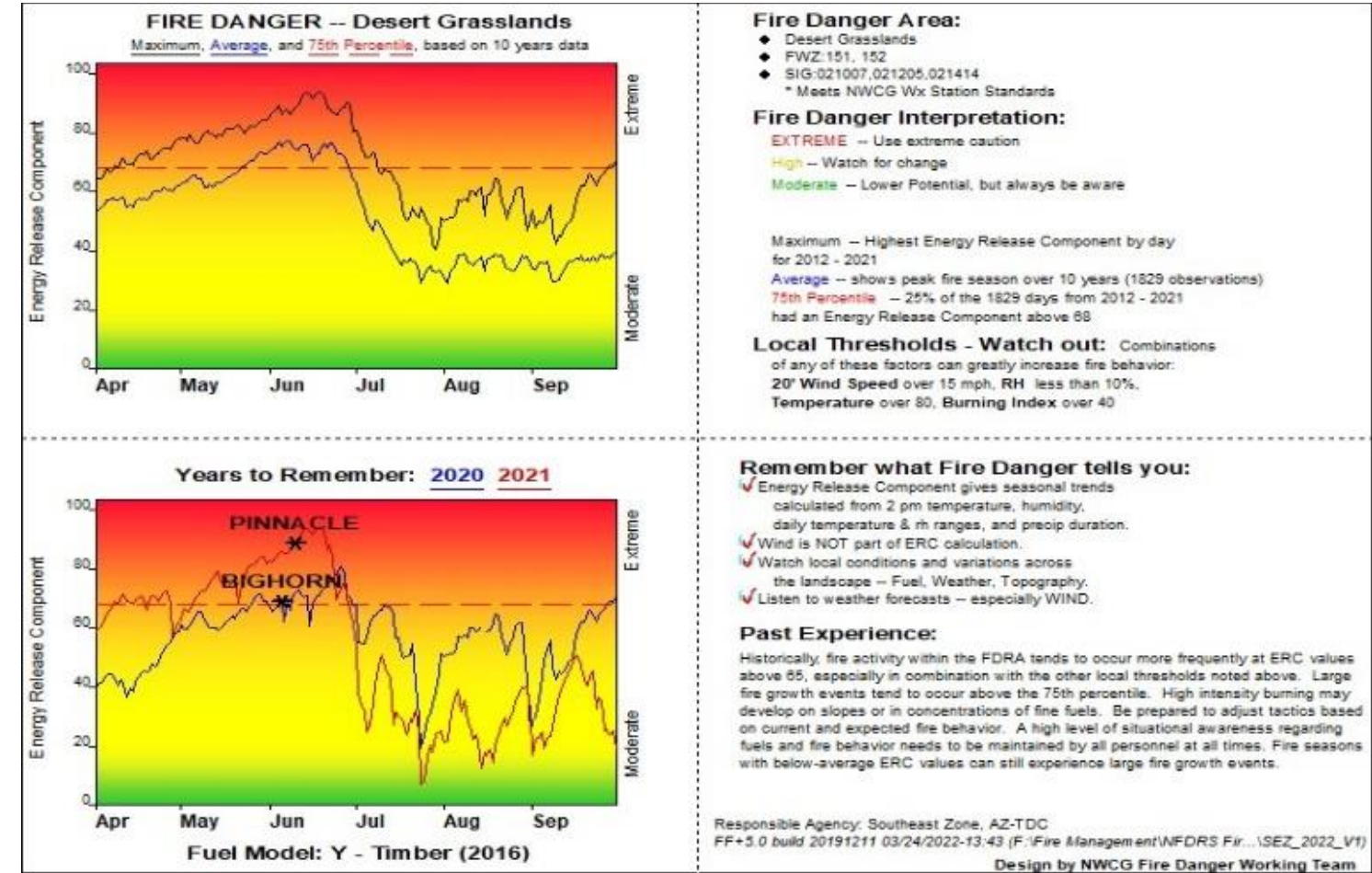
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Column B: Source (Commenter/Authority)
Column C: Section Number of Comment
Column D: Page Number of Comment (first page associated with comment)
Column E: Paragraph number, on page, of Comment
Column F: Line Number (within Paragraph above) of Comment
Column G: Comment Classification
Column H: Comment
Column I: Response

Comment Classifications

- (C) Critical: Critical comments will result in a critical issue. Provide convincing support.
- (M) Major: Major comments are significant concerns that may result in a major issue. This category may be used with a general statement of concern followed by a detailed comment on the specific entries in the document that, considered in total, constitute the concern.
- (S) Substantive: An entry in the document that appears to be or is potentially unnecessary, misleading, incorrect, or confusing.
- (A) Administrative: Administrative comments correct inconsistencies between different sections, typographical and grammatical errors.
- (

Notes: Comments must be actionable ("add the following text:...", "delete...", "change text to:")
Place only one comment per row.
Classify comment as C, M, S, or A.



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Subject: [Non-DoD Source] RE: INFO: Interim Draft Arizona Airspace EIS for Review in January 2024

Dear Grace Keesling,

Thank you for the notification of the upcoming review for the Interim Draft EIS for Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona. I have let key POC know and we should be able to meet the

request. As you know the annual use or loose will not end until Jan 12th so staffing may be limited until that time. All should be back by then, and some may be back before then.

We look forward to continuing to work with you and your team.

Sincerely,
Wendy Jo Haskins



Wendy Jo Haskins
Director Ecosystem Resources & Environmental Planning
USDA Forest Service Southwestern Region
c(b) (6) [REDACTED]
wendy.haskins@usda.gov

Caring for the land and serving people

Referred to DAF

Referred to DAF

From: Mizuno, Lisa - FS, NM <Elisabeth.Mizuno@usda.gov>
Sent: Monday, March 18, 2024 10:10 AM
To: KEESLING, GRACE E CIV USAF AFMC AFIMSC/CIET <grace.keesling.1@us.af.mil>
Cc: Mizuno, Lisa - FS, NM <Elisabeth.Mizuno@usda.gov>; Haskins, Wendy - FS, NM <wendy.haskins@usda.gov>
Subject: [Non-DoD Source] RE: ACTION: Interim Draft Arizona Airspace EIS for Review - NEW SUSPENSE 5 February

Ms Keesling, greetings...

I have reached out to the biologists and they are ok with waiting to review the BA and USFWS correspondence when the Final EIS is released which meets the intent of our comment on the subject.

Thank you, please let me know if you have any other questions.

Sincerely – Lisa Mizuno



Lisa Mizuno
Environmental Coordinator
Forest Service
Gila National Forest
p: 575-388-8267

elisabeth.mizuno@usda.gov
3005 E. Camino del Bosque
Silver City, NM 88061
www.fs.usda.gov



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From: Haskins, Wendy - FS, NM <wendy.haskins@usda.gov>

Sent: Saturday, February 3, 2024 4:10 PM

To: KEESLING, GRACE E CIV USAF AFMC AFIMSC/CIET <grace.keesling.1@us.af.mil>

Cc: Thiel, Chris - FS, AZ <Christine.Thiel@usda.gov>; Mizuno, Lisa - FS, NM <Elisabeth.Mizuno@usda.gov>; Mandell, Andrew - FS, AZ <andrew.mandell@usda.gov>; Cox, Sean - FS, AZ <sean.c.cox@usda.gov>; Nuttall, Jacob - FS, NM <jacob.nuttall@usda.gov>

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Common Comment and Response Worksheet (Version 3)

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Item	Commenter	Section	Page	Para	Line	Class	Comment	Response
1.							1.	
2.	Sean Cox Fire & Aviation Officer Coronado NF	Global					The Coronado NF Fire staff are aware of the operating minimums in designated range MOA's, and minimum floors outside of said range and MOA locations. We appreciate the integration and use of the fire danger rating products in the Central Scheduling Enterprise program. We invite schedulers to routinely communicate and seek clarification on National Fire Danger Ratings with local federal fire dispatch centers; or at a minimum, with the Southwest Coordination Center based in Albuquerque, New Mexico. Standard Operating Procedures can easily be identified to make this a best practice with minimal impact to a schedulers' workload. An easy graphic to demonstrate the susceptibility to fire starts throughout the calendar year is the utilization of the "pocket card for Southeast Arizona," as shown in this example below (last page of this document)	No change to EIS indicated. Local conditions are already considered by airspace managers prior to use. Airspace managers have established lines of communication with fire management personnel.
3.	A. Dahlby Wildlife Biologist Coronado NF	3.6.2.3 Special-status Species, Federally Listed Species	3-65	Table 3.6- 2	1		If the reason you are not including critical habitats for reptiles, small mammals, amphibians, fish, and invertebrates is same reason as listed on page 3-63, lines 19-21, then suggest stating that here.	Change made. Line 19-21 are the sentences introducing Table 3.6-2. Added a table note reiterating that there is no ground disturbance, thus no effect to critical habitat for amphibians, reptiles, fish, small mammals, and invertebrates.
4.	A. Dahlby Wildlife Biologist Coronado NF	3.6.2.3 Special-status Species, Federally Listed Species	3-66	Ocelot and Jaguar	18-26		These two cat species occupy very similar habitats in AZ and NM, and those habitats are not as you describe them in the EIS (e.g., lowland wet communities does not accurately represent habitat where these species have been documented in SE AZ and SW NM). Suggest mentioning designated critical habitat in the jaguar paragraph (see Mexican spotted owl).	Change made. Jaguar paragraph updated reflect accurate habitat and sentence on jaguar critical habitat added. Additional information on ocelot habitat added to ocelot paragraph.
5.	A. Dahlby Wildlife Biologist Coronado NF	3.6.2.3 Special-status Species, Federally Listed Species	3-66	Yellow-billed Cuckoo	27-34		Similar to jaguar and ocelot, the habitat description for this species does not reflect habitat used in SE AZ and SW NM. Suggest mentioning of designated critical habitat in this paragraph (see Mexican spotted owl).	Change made. YBC paragraph updated with habitat information from the USFWS ECOS website. Sentence on critical habitat added as well.
6.	C. Thiel NR Staff Officer Coronado NF	3.6.3 Environmental Consequences to Natural Resources	3-68	3	18-20		Replace "FAA" in this sentence with "USFWS": <i>FAA defines significance threshold for actions likely to jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat.</i>	Change made. This sentence is providing the FAA significance threshold criteria for assessing proposed actions. It has been revised for clarity.
7.								
8.	Lisa Mizuno, NEPA Gila NF	3.2.2 Affected Environment	3-7		1	A	There is an inconsistency in the figure based on description of the Affected Environment on page 3-5 lines 31 to 38 which describes which MOAs would address impacts to airports and civilian aviation due to horizontal and vertical changes. The figure addresses the Outlaw and Jackal MOAs and includes the Reserve and Morenci MOAs. The inconsistency is showing air strips and helispots in the Reserve and Morenci MOAs. Either remove those features from the two MOAs or for more consistency, include the same features in the New Mexico portion of MOAs	No change. The figures for each MOA show airports beneath the MOA and those within close vicinity that may be impacted. Thus, a few of the airports that occur beneath Reserve and Morenci are shown on the figure that is addressing Outlaw and Jackal MOA since they are in close vicinity to Outlaw MOA. There are not dimensional changes proposed to Morenci and Reserve, thus a specific figure for airports beneath those MOAs is not necessary.

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9.	Lisa Mizuno, NEPA Gila NF	3.4.3.4	3-39		12-17	M	Understand noise does not reach levels for FAA reporting or analysis for the Reserve and Morenci MOAs on the Gila National Forest. Supersonic Noise Exposure for Alternative 2 (as well Alternative 3 and 4) at the proposed flight level changes is new and does increase noise levels above subsonic noise levels. As stated in the Gila National Forest scoping letter (dated February 2, 2022), the value and character of solitude of the Gila and Blue Range Wilderness areas is very important to forest users. These areas are of extreme quiet with little human activity. There is the potential for more public concern, disagreement, and comments on proposed supersonic flight levels and potential impacts of sonic booms over wilderness areas. But overall, the lack of including or acknowledging the presence of the Gila and Blue Range Wilderness areas within the text or figures is concerning. Request additional mitigations for Wilderness areas.	Change made. Wilderness Areas added as a subsection to 3.7 Land Use to discuss the noise exposure changes more specifically in these areas.
10.	Lisa Mizuno, NEPA Gila NF	3.6.3				C	The entire section lacks analysis of effects or impacts to wildlife species from overpressure or pressure waves generated from sonic booms	Change made. Available research on sonic boom impacts to wildlife has been added.
11.	Sandra Taylor, Wildlife Biologist Gila NF	3.6.2.3 Table 3.6-2	3-65		1	M	Add to table 3.6.2 designated critical habitat for spokedace and loach minnow which is located within the Reserve MOA.	Change made. Added a table note - “The Proposed Action would not involve any ground disturbance, thus critical habitat for federally listed amphibians, reptiles, fish, small mammals, and invertebrates is not included in this table.”
12.	Sandra Taylor, Wildlife Biologist Gila NF	3.6.3.2	3-76		14, 15	S	The Mexican gray wolf is an experimental population. Replace the determination of “may affect but is not likely to adversely affect” with “not likely to jeopardize”.	Change made.
13.	Sandra Taylor, Wildlife Biologist Gila NF	3.6.3.2	3-76 3-77		32-43 1-5	M	In the Final Recovery Plan for the Southwestern willow flycatcher (August 2002), it mentions that SWFL are sensitive to vibrations. Impacts of pressure waves (vibrations) caused by sonic booms should be considered in the analysis for effects to the species.	Change made. Revised the following sentence (this is the only mention of vibrations in the Recovery Plan: “Noise disturbance, particularly from recreationists, is listed among the threats to the southwestern willow flycatcher and is often accompanied by other impacts such as vegetation damage and removal, increased incidence of fire, increased spread of invasive plant species, increases in predation, and disturbance from vibrations from low-frequency noise.” Additional research on sonic boom impacts has been added throughout section 3.6 and the environmental conclusion section for southwestern willow flycatcher. There is no species-specific research on sonic boom or vibration impacts on Southwestern willow flycatcher.
14.	Lisa Mizuno, NEPA Gila NF	3.6.3.2	3-77		21-34	C	Sonic boom sudden noise and pressure waves on breeding Mexican spotted owls should be assessed. On line 22, study states there is a different response by owls to “events such as thunderstorms” compared to normal overflights.	Change made. Available research on sonic boom impacts to wildlife has been added.
15.	Lisa Mizuno, NEPA	3.7.2				M	There is concern that ownership and recreational areas are not being displayed for the Reserve and Morenci MOAs like the other MOAs displayed in Tables 3.7-1 to	Change made. An analysis of Wilderness Areas beneath all MOAs has been added.

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	Gila NF						3.7-3. Understand that these are not included due to not having proposed changes in the horizontal or vertical expansions or noise levels. There is the potential for more public concern, disagreement, and comments on recreational uses and opportunities in relation to assessed impacts and effects of the proposed changes, especially within the Gila and Blue Range Wilderness areas	
16.	Lisa Mizuno, NEPA Gila NF	Appendix L2				M	The Gila National Forest would like to be able to review the BA and USFWS response for this project. The Mexican spotted owl is one of the species of forest concern due to the impacts to PACs, critical habitat, and recovery habitat within the Upper Gila Mountain Ecological Management Unit from previous fires.	Biological Assessment or supporting documents for Section 7 consultation will not be circulated to cooperating agencies prior to submittal. A copy of the BA/supporting documents and related USFWS correspondence will be included in the EIS.
17.	Ronald Turner Trails and Wilderness Coordinator Tonto NF	Recreation				M	Concern is NF mandate to protect wilderness character. Low level flight detracts from wilderness character and diminishes our user’s wilderness experience. The area on the flight maps I am most concerned about is Outlaw as it contains two of our wilderness areas. The Superstitions and Salt River Canyon. To reduce the flight deck to for supersonic travel while also increasing the amount of flare use in combination of also lowering flight levels for flare training to 2000 feet above ground level would have a negative impact on our wilderness To add to my concerns, I have witnessed low level flights by the military in both Four Peaks Wilderness and the Mazatzal Wilderness over the last few months. Each time at very high speeds and seemingly low altitudes. This may be a good time to get those concerns addressed as I don’t see an MOA that includes either of those locations. I have zero issues with and flights taking place outside our wilderness areas. Regional Office Note: perhaps recognizing designated wilderness areas as special places and having some additional mitigations could help reduce concerns for noise and solitude. An example would be for pilots to try and avoid sonic booms when flying over a designated wilderness area. Others may include timing etc. if appropriate.	Change made. Section 3.7 Land Use has been revised to specifically discuss Wildnerness Areas beneath all the MOAs.
18.	Andrew Mandell Fire Staff Officer Tonto NF	Global					From fires perspective our concerns are captured in the draft response very well. Regional Office note: The USFS would like to invite the bases to consider establishing ways to engage with the USFS Fire & Aviation staff at each Forest and Regional Office for up-to-date status on fire conditions and operations.	No change to EIS indicated. Airspace managers have established lines of communication with fire management personnel; military aircraft avoid SUA if there are fire fighting activities occurring.
19.	L Atkinson NR Specialist	3.10.2.2	3-104		25	A	Oak Flat, not Oak “Flats”	Change made.
20.	L Atkinson NR Specialist	3.10.2.2	3-104		27	A	The National Register of Historic Places Form for <i>Chí’chil Bít dagoteel</i> (Oak Flat) submitted on September 22, 2014, not 1994	Change made.
21.	L Atkinson NR Specialist	4.0 References	4-5		36	A	Year 2014, not 1994	Change made.
22.								
23.								
24.								

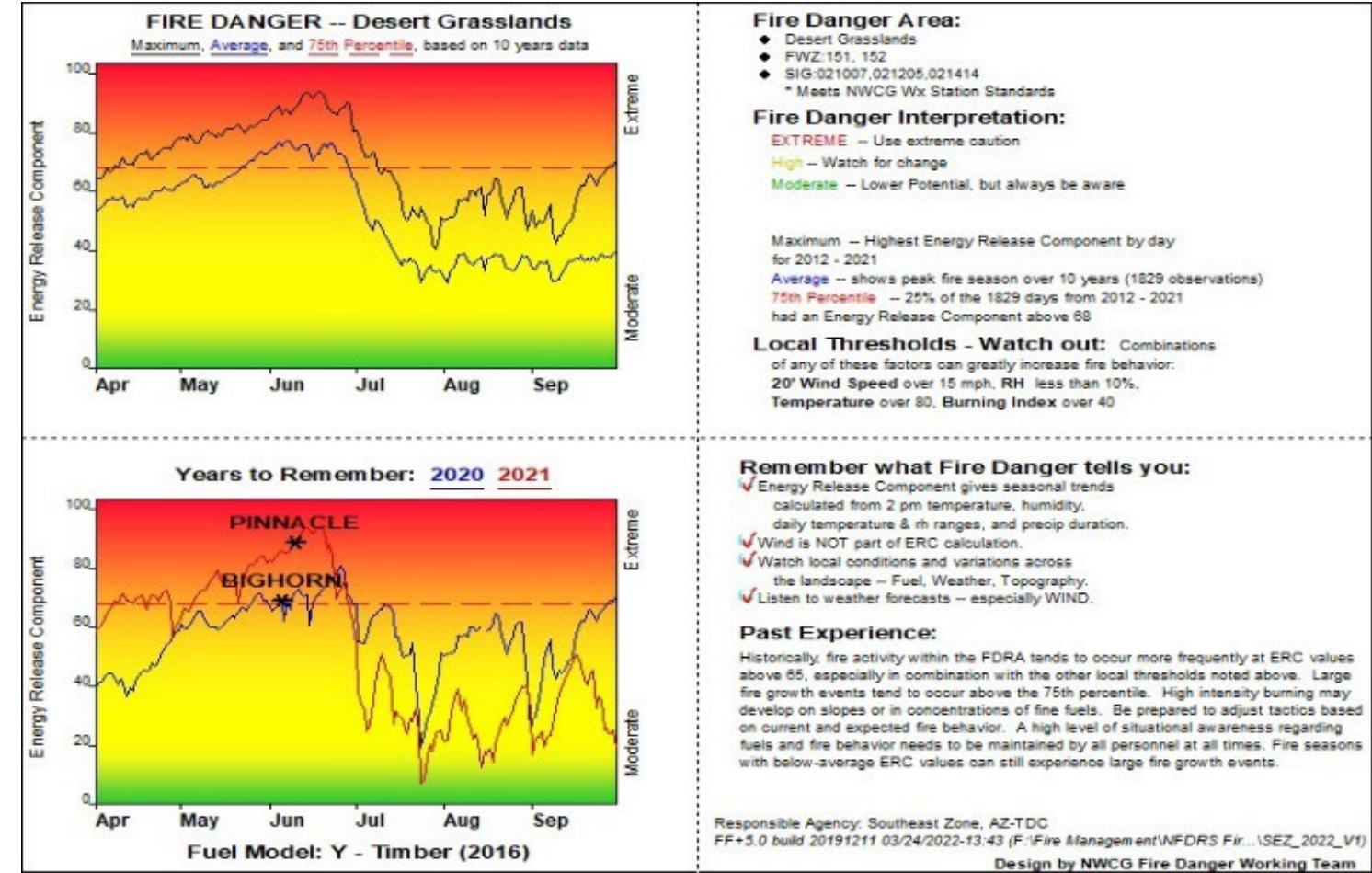
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Column A: Comment Identifier Number
Column B: Source (Commenter/Authority)
Column C: Section Number of Comment
Column D: Page Number of Comment (first page associated with comment)
Column E: Paragraph number, on page, of Comment
Column F: Line Number (within Paragraph above) of Comment
Column G: Comment Classification
Column H: Comment
Column I: Response

Comment Classifications
(C) Critical: Critical comments will result in a critical issue. Provide convincing support.
(M) Major: Major comments are significant concerns that may result in a major issue. This category may be used with a general statement of concern followed by a detailed comment on the specific entries in the document that, considered in total, constitute the concern.
(S) Substantive: An entry in the document that appears to be or is potentially unnecessary, misleading, incorrect, or confusing.
(A) Administrative: Administrative comments correct inconsistencies between different sections, typographical and grammatical errors.
(

Notes: Comments must be actionable ("add the following text:...", "delete...", "change text to:")
Place only one comment per row.
Classify comment as C, M, S, or A.



From: Haskins, Wendy - FS, NM

Sent: Monday, May 6, 2024 5:36 PM

To: KEESLING, GRACE E CIV USAF AFMC AFIMSC/CIIE

Subject: RE: ACTION: Interim Draft Arizona Airspace EIS for Review - NEW SUSPENSE 5 February

Hi Grace Keesling,

Thank you very much for sending the responses and for the consideration to them.

We look forward to continuing to work with you and your team as a cooperator as the project progresses.

With Sincerity,

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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	Robert Wilson	Forest Aviation Officer	robert.j.wilson@usda.gov
Coronado National Forest	Chris Thiel	Natural Resource Staff Officer	christine.thiel@usda.gov
Gila National Forest	Lisa Mizuno	Environmental Coord.	elisabeth.mizuno@usda.gov
Tonto National Forest	Taiga Rohrer	Fire, Fuels & Aviation Staff Officer	taiga.rohrer@usda.gov
Southwestern Region	Jake Nuttall	Director, Fire & Aviation Management	jacob.nuttall@usda.gov

Southwestern Region	Wendy Jo Haskins	Director, Ecosystems Planning & Physical Resources	wendy.haskins@usda.gov
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Please send add all the contacts to your mailing list in regard to the EIS and reach out to Wendy Jo Haskins 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,

MICHIKO J. MARTIN
Regional Forester

cc: Neil Bosworth, Adam Mendonca, Judy Palmer, Kurt Davis