

Arizona Regional Airspace EIS
501 Butler Farm Road, Suite H
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Submitted via certified mail and online form

To Whom It May Concern:

On behalf of the undersigned organizations and businesses, thank you for accepting our scoping comments on the proposal for Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona.

We have serious concerns, outlined below, about this proposal's potential impacts on public lands and wildlife, tribal lands, rural communities, and the environment across southern Arizona and southwest New Mexico, as well as what we believe was inadequate public outreach during the scoping process.

1. Public involvement The Air Force has failed to meaningfully engage with the public by limiting public meetings solely to potentially directly impacted communities, rather than regional population centers, and failing entirely to hold even one virtual meeting. We are aware of the restrictions under which the Air Force needed to hold its public meetings; of particular difficulty was the requirement that meetings not exceed 50 attendees. However, we cannot understand why there were no virtual meetings to alleviate any COVID-related restrictions. The Air Force seems to have tied its own hands and then shrugged off our reasonable requests for additional engagement. Additionally, the lack of sufficient notice and the already abbreviated scoping period made it nearly impossible for groups like Peaceful Gila Skies, who are clearly interested parties illustrated by the significant engagement during the Holloman AFB MOA expansion process, to understand the proposal, digest the available information, and identify our concerns. Because of the above, Peaceful Gila Skies requested in writing, an extension to the comment period. Our request was not granted. We are disheartened to reflect on the similarities of this process with the process we were forced to work with during the Air Force EIS process to optimize the air space for Holloman Air Force Base.
2. Purpose and need No data are provided to support the Air Force's purpose and need for the proposed action. No current and/or future needs are articulated for any of the ten Military Operations Areas (MOAs) or the aircraft stationed at any of the bases in Arizona.
3. Alternative 1 After reviewing the available materials for the Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona, the undersigned organizations conclude that we support Alternative 1, the No Action Alternative. Alternatives 2, 3, and 4 are unacceptable, in part for the reasons outlined below.

4. Lack of specificity The Air Force has provided no information about the type and number of aircraft that will train in the ten MOAs, the frequency of aircraft sorties, the number and timing of supersonic missions, specifics about missions to be executed, or the percentage of low-level or supersonic flights that will occur during nighttime hours. Absent this information, it is extremely difficult to provide substantive scoping comments. Is the airspace use for the beddown for the Taiwan Air Force and any other Foreign Military Sales training included in this proposal? What is the percentage of sorties by type of aircraft from foreign militaries that are part of this proposal?
5. Current and changing needs are unclear At the scoping meeting in Reserve on February 22, 2022, Air Force staff stated that current use by Luke AFB, Morris ANGB, and Davis-Monthan AFB is the basis for planning the SUA modifications. However, there appears to be considerable mission change at these bases right now. For example, F-16s of the Taiwan Air Force are being transferred from Luke AFB to Morris ANGB because the mission at Luke AFB is changing: “The need for the Proposed Action is to relocate the TAF F-16 FTU in order to accommodate the programmed beddown of F-35s at Luke AFB under the USAF’s 26 2012 Record of Decision (ROD). All F-16 FTUs currently operating at Luke AFB 27 must either be relocated or retired.”

https://www.afcec.af.mil/Portals/17/documents/Environment/Taiwan%20AF%20to%20Tucson/EA_for_TAF_Relocation.pdf

If that is true, how can current use be the basis for planning at Luke AFB? Reportedly, Luke is also shedding its Foreign Sales training mission as well. Is that true?

The same recent EA document for Taiwan Air Force also states that all current dimensions of SUA used by Morris ANGB are adequate to meet the F-16 training requirements. If that is the case, why do the flight floors for SUA scheduled by Morris ANGB need to be changed?

Reportedly the mission at Davis-Monthan is also changing: A-10 aircraft are being moved out and HH-60 helicopters that focus on rescue operations are being moved in.

https://tucson.com/news/local/davis-monthan-to-lose-a-10s-but-gain-rescue-units-in-air-force-plan/article_527a8140-da7c-11eb-bc5f-ebc68710d7b2.html

Clearly, “current use,” the response provided by Air Force staff to questions regarding intensity of use in the proposed modifications to SUA, is inadequate. There is still too little information available to make comprehensive scoping comments. And looking a little more closely at this problem reveals how inadequate the NOI is.

6. Wildfire risk We have grave concerns about the risk of wildfire ignition in this arid region due to the dropping of flares from aircraft. Exacerbating the already considerable probability of wildfires is the Regional Special Use Airspace (SUA) Optimization proposal to decrease to 2,000 ft. Above Ground Level (AGL) the altitude at which flares may be dropped in the Outlaw, Jackal, Bagdad, Gladden, and Tombstone MOAs.

For example, three catastrophic wildfires have occurred in the past decade in the Gila National Forest and Gila and Aldo Leopold Wilderness Areas, burning nearly 500,000 acres, including the Whitewater-Baldy Complex Fire that still stands as the largest fire in New Mexico’s history. Climate change in the Southwest has brought about a dramatic decrease in

winter snowpack and summer monsoon precipitation, and increased mean temperatures, as well as long term drought, making the area extremely vulnerable to wildfire.

In June 2021, a wildfire known as the Telegraph Fire burned more than 180,000 acres and at least fifty structures near Superior, Arizona, on the border of the Outlaw and Jackal MOAs. This fire is believed to have been caused by the Arizona Air National Guard's dropping of flares from F-16s, which were confirmed to have been training in the area at the time the fire started.

The Air Force must thoroughly assess the wildfire risk from the use of flares and develop protocols to reduce wildfire risk and realistic plans for fighting a flare-induced fire. Further, they must justify the need for dropping flares from lower altitudes than currently authorized. They need to analyze the cumulative impacts of the number of flares that will be deployed across the ten MOAs in Arizona and New Mexico, especially in light of climate change and the current megadrought conditions in the Southwest. Additionally, the cost of fighting wildfires, particularly in remote areas, can be in the 10's of millions of dollars and the economic costs to communities can be similar. This must be addressed.

7. Contamination of land, air, and water from jet emissions and chaff The proposed Regional SUA Optimization over southern Arizona and southwest New Mexico will continue to generate significant amounts of jet emissions and contaminant releases, potentially causing diminished air and water quality and deposition of pollutants on the land beneath the MOAs.

Military jets emit air pollutants that are regulated by the Environmental Protection Agency. Releasing chaff from aircraft introduces aluminum, silica fibers, and plastic into pristine forests and wilderness areas. Wildlife can ingest these materials by mistaking these small particles for food. The chaff material can also enter waterways and pose a water quality concern. The proposed action would authorize the use of chaff in the Tombstone MOA for the first time, thus increasing the overall amount of pollution in the ten MOAs.

Flare pellets contain Teflon that breaks down into sodium trifluoroacetate and potassium perchlorate, among others, which are known to be extremely toxic to aquatic organisms.

The Environmental Impact Statement (EIS) should estimate the concentration of flares and chaff fibers to be released in the ten MOAs and evaluate the cumulative impact of deposition of this foreign material to land and waterways. The studies about chaff which are often cited are seriously outdated. New studies are needed.

8. Public safety Related to the above issue of contamination from flares and inhalable chaff is our concern about dud flares. Although the percentage of flares that fail to ignite may be small, these dud flares accumulate on the land as unexploded ordnance with potentially fatal consequences to unwary humans and wildlife alike. In 2017, a woman living near Fort Thomas, Arizona, (Jackal MOA) found a dud MJU-7A/B flare while walking. Not knowing what it was, she picked up the flare, which exploded in her hands. The woman sustained a 49% of total body surface area burn and underwent seven major operative skin excisions for

her deep third-degree burns. <https://gilavalleycentral.net/fort-thomas-woman-burned-in-flare-explosion/>

The sudden, loud noise from supersonic flights presents a serious human safety concern, as horses startle and may throw their riders, causing injuries and even fatalities to equestrians, hunters, packers, and outfitters who use public lands under the MOAs.

The lack of studies on the effects of airborne chaff on human and animal respiratory and pulmonary systems needs to be addressed. Similarly, toxic flare components impact not just aquatic life, but humans using public lands where these pollutants have been deposited on land or in waterways under the MOAs.

9. Noise There are thousands of studies on the impacts of noise on human physical and psychological well-being. Indeed, the sheer volume of studies points to the magnitude of the problem. Virtually all existing noise research has been about its negative impacts, with very little research on the benefits of quiet, partly because there is so little of it available. What has been done suggests that quiet helps people relax, makes them more willing to help others, and enables them to perform better on tests and to get a good night's sleep. Research with children who have attention-deficit (hyperactivity) disorder shows that experiencing quiet in nature is as effective as medication and has none of the deleterious side effects. In short, the benefits of quiet cannot be overstated.

The Air Force EIS must include a robust study of the impacts of noise, including sonic booms, on human communities in both urban and rural settings, as well as in forests and other wildlife habitats.

10. Quiet recreation The areas affected by the ten MOAs in the proposal contain many parcels of public lands that are prime destinations for local residents and visitors alike. These areas are increasingly important as the US becomes a noisier place, and they must be protected. The COVID-19 pandemic has highlighted the importance of quiet places for physical, emotional, and spiritual health. The DEIS must disclose the effects of low-level and supersonic missions on the quiet recreation opportunities currently afforded in the public lands within the MOAs in the SUA Optimization proposal.

11. Wildlife impacts The proposed action encompasses four National Forests, twelve US Forest Service Wilderness Areas, three US Forest Service Wilderness Study Areas, 18 Bureau of Land Management Wilderness Areas, nine BLM Wilderness Study Areas, 22 BLM Areas of Critical Environmental Concern, four BLM Research Natural Areas, one BLM Riparian National Conservation Area, four National Wildlife Refuges, two National Monuments, the Continental Divide National Scenic Trail, and a National Recreation Trail.

In addition, the following streams and rivers, estimated at 155 river miles, have been proposed by a citizens' coalition for Wild and Scenic River designation: Upper Frisco Box, Devil's Creek, Mineral Creek, Whitewater Creek, Lower San Francisco River, Mule Creek, Galita Creek, Middle Fork Gila River (portions), West Fork Gila River (portions), Iron Creek, Spruce Creek, Willow Creek, West Fork Mogollon Creek, Mogollon Creek, and Indian Creek.

These vast public lands, with a large range of elevations and diverse ecosystems, contain habitat for many species of native plants, mammals, birds, amphibians, reptiles, fish, and other aquatic organisms. To provide just one example of the potential effects of the proposed action, many animal species use sound to communicate, to detect prey, and to avoid predation. Jet noise can mask communications, interfere with daily cycles, cause stress, and reduce the distance over which animals can perceive important acoustic signals.

The DEIS must include a thorough analysis of the extent to which the proposed action would impact all species of plants and wildlife, including federally-listed threatened and endangered species and state-listed Species of Conservation Concern. For example, the National Audubon Society Animas Mountain Important Bird Area, home to many imperiled species, is in the Tombstone MOA. The Portal/Cave Creek area in the Chiricahua Mountains, which would be impacted by increased and louder low-level military missions in the Tombstone MOA, is a popular destination for birders from all over the world.

12. Economic impacts to local communities A clean, quiet environment is directly linked to the tourism and outdoor recreation economy in New Mexico and Arizona. Birding, wildlife viewing, hiking, backpacking, hunting, and angling are important components of the outdoor economy in the region. Many studies point to the economic benefit of living near protected public lands. Counties with significant percentages of protected public lands create jobs at a greater rate and have higher per capita incomes than counties without protected lands.

Increasing low-level and supersonic military training exercises in these areas is likely to be significantly harmful to local economies, especially to areas with prime hunting and angling opportunities. High decibel, frequently-occurring noise by military aircraft is also likely to depress property values. The Air Force must complete a comprehensive analysis of the effects to local communities from the loss of tourism dollars and reduction in property values.

13. Effects on veterans Many military veterans recreate on public lands as a path to healing and peace. Time spent in wilderness and on public lands can be extremely effective for mitigating the effects of Post-Traumatic Stress Disorder (PTSD) and other trauma. Exposing veterans to low altitude military training exercises and the sudden-onset noise from supersonic flights would not only remove the palliative aspects of the quiet forest, but could actually cause more trauma.

In addition to military veterans, other members of the public are also afflicted with PTSD from causes such as physical and sexual violence and experiences with natural disasters. The wild places, including public lands under the ten MOAs, which currently serve as safe havens for veterans and other PTSD sufferers, could instead become inhospitable places and even sources of further trauma.

The Air Force should analyze the Regional SUA Optimization's impacts on veterans and other persons with PTSD.

14. Risk of Crashes Training sorties, by their very nature, inevitably experience accidents and mishaps. The potential catastrophic effects of military jets crashing in remote wilderness

areas or other public lands, or in one of the rural communities impacted by the MOAs proposed for training, is a frightening prospect for affected communities and land management agencies. There have been several Air Force jet crashes, including one from Luke Air Force Base that crashed near Buckeye on February 10, 2022 according to the *Arizona Republic* in an article dated 2/11/2022. The article documents five other Air Force jet crashes in Arizona between 1994 and 2016.

The DEIS needs to fully evaluate the impact of Class A (total loss of aircraft and loss of life), Class B, and Class C mishaps. In addition, the DEIS needs to identify agency response protocols in forests and wilderness, which are necessarily quite different from responses in urban areas with available emergency response infrastructure. First response units in rural, low-income communities affected by the proposal lack the personnel, resources, and expertise to respond to aircraft crashes.

15. Impacts to wilderness areas, roadless areas, Wilderness Study Areas, Areas of Critical Environmental Concern, Research Natural Areas, Riparian National Conservation Areas, National Wildlife Refuges, and National Monuments There are ever fewer remaining places in the US where humans have had little to no impact. Therefore, it is immensely important to protect remaining areas that provide outstanding opportunities to experience solitude and primeval natural characteristics. Southwest New Mexico and southern Arizona are fortunate to be home to a variety of areas (see the list in #11 above) that provide all those values. Please see the attached map of federal public lands in relation to the MOAs included in the proposed action.

More information on the ways in which designated areas would be affected by the proposed action is included in the section on individual MOAs.

Have federal agencies that manage federal public lands, such as the US Forest Service, Bureau of Land Management, National Park Service, and US Fish and Wildlife Service, been consulted on the proposed action? If not, they should be notified about the proposed action so that they can provide input to the Air Force.

Have state agencies in Arizona and New Mexico that manage state lands been consulted on the proposed action? If not, state agencies, such as the New Mexico State Land Office, New Mexico Department of Game and Fish, Arizona Game and Fish, and Arizona and New Mexico State Parks Departments should be notified of the proposed action and a request made for their input.

16. Environmental justice The proposed action would profoundly affect three tribes, the Tohono O'odham Nation, White Mountain Apache Tribe, and San Carlos Apache Tribe. The Air Force claims to be consulting directly with tribal governments, which are often not representative of tribal members' concerns. To our knowledge, the Air Force held a public meeting in Ajo, Arizona on the edge of the Tohono O'odham Nation, but not on White Mountain or San Carlos Apache lands which are clearly places without easy internet access - the threshold used by the Air Force to determine where to hold public meetings.

The Tohono O'odham Nation could experience an extended period of military training every day with more extreme noise as the Air Force increases the time of use of the Sells, Ruby, and Fuzzy MOAs by 5-6 hours per day, to as late as midnight, Monday through Friday and at other times by a Notice to Airmen (NOTAM). The impacts of extreme noise on tribal members must be analyzed, as must the potential impact of the pressure wave of supersonic flights on sacred sites on Native lands under MOAs.

In addition to tribes, southern Arizona and southwest New Mexico are populated by several low-income communities of color. Unfortunately, the Air Force failed to hold meetings in relatively populous minority and low-income communities, such as in Grant and Hidalgo Counties in New Mexico. All federal agencies must address environmental justice to ensure that proposed actions do not have disproportionately high and adverse human health or environmental effects on low-income or minority populations.

17. Regional SUA Optimization public information fails to include all available airspace

The available Air Force information provided did not mention all SUAs currently in use by Davis-Monthan and Luke Air Force Bases and the Morris Air National Guard Base. For example, Luke AFB controls and uses the Sunny MOA. Similarly, all three bases currently use the Barry M. Goldwater Range for missions, and this use is expected to continue even if an Alternative in the proposed SUA Optimization project is implemented. By excluding Barry M. Goldwater Range and the Sunny MOA, the Notice of Intent and EIS website minimize the actual amount of SUAs available to the bases and imply that only the MOAs identified in the public information will be available to meet their training needs.

Since the information on the Goldwater Range and the Sunny MOA were not included in the scoping information, it is unclear whether the purpose and need for this proposed action are justified. Can these areas be used instead without causing significant impacts to rural and tribal communities, public lands, and wildlife, as will occur with Alternatives 2, 3 and 4?

18. Impacts to structures from supersonic flights We are very concerned about possible damage to structures caused by increased levels of overpressure generated by supersonic flight. The pressure waves generated by supersonic flights at 5,000 - 10,000 ft. AGL fall within a range that can break glass, crack plaster, and collapse free-standing walls.

<https://www.gov.nl.ca/ecc/files/env-assessment-projects-y2010-1404-supersonic-ea-annex-b-ver-10.pdf> These concerns are in addition to the human safety and animal - domestic and wild - effects listed above.

19. Comments specific to individual MOAs

Tombstone MOA

- Tombstone proposed action Alternatives 2 and 4 expand the existing Tombstone MOA for an additional 798 square miles. What are the needs to be met by expanding the lateral dimensions of the airspace (Alternatives 2 and 4) vs. not expanding the airspace

horizontally (Alternative 3)? What is the increase in impacts to residents, wildlife, tourism, recreation, and ranching for the laterally-expanded airspace? The expanded airspace will impact the Chiricahua National Monument, an important tourist destination in southeast Arizona. The loss in recreational value from supersonic and low-level (100 ft. AGL) training over this area should be assessed.

- Assess the impacts on local residents, wildlife, tourism, recreational values, ranching, and other economic activities of the increase in times of use for the Tombstone MOA to include the weekends. There are many important recreation areas, including the Continental Divide National Scenic Trail, Chiricahua National Monument, wilderness areas, and wilderness study areas, that will be affected by using the MOA on the weekends when recreational use is higher. The loss in recreational values should be evaluated.
- Evaluate the increase in extreme noise and property damage from pressure waves due to sonic booms from fighter jets allowed to reach supersonic speeds at significantly lower altitude (5000 ft. AGL to 10,000 ft. AGL floor, down from 30,000 ft. MSL). Because the pressure waves generated by supersonic flights at 5,000 - 10,000 ft. AGL fall within a range that can break glass, crack plaster, and collapse free-standing walls, evaluate the potential damage to property that will occur for Alternatives 2 - 4, as well as the impacts to residents, wildlife, recreation, cattle ranching activities, and other economic activities that occur in the area. Ecologically important areas such as the San Bernardino National Wildlife Refuge and Leslie Canyon National Wildlife Refuge and the Cave Creek area of the Chiricahuas could be adversely affected by supersonic training at these low altitudes. The impacts must be evaluated.
- Similarly, there will be an increase in extreme noise and potential damage from military aircraft training as low as 100 ft. AGL.
- The Air Force proposes to authorize deployment of chaff in the Tombstone MOA. Currently, use of chaff is not permitted. The environmental impacts to land, air, and water from release of these aluminum-covered silica fibers must be assessed.
- Flares will be permitted to be released at 2000 ft. AGL (down from 5000 ft. AGL), increasing wildfire risk from flares not burning out before they hit the ground. “In Nevada, flare fires have occurred in areas where minimum release altitudes are 5,000 feet AGL.” A fire in Meadow Valley, for example, that burned 21,600 acres in 1993 was attributed to flare use by a BLM fire investigator.
<https://ntrl.ntis.gov/NTRL/dashboard/searchResults/titleDetail/PB98110620.xhtml> The increased wildfire risk of allowing flares to be dropped from 2000 ft. AGL should be evaluated.
- The Air Force should include an assessment of the range of impacts to important birding areas in the Chiricahuas (e.g. Cave Creek, National Audubon Society Animas Mountain Bird Conservation Area), and the research conducted by the Southwestern Research Station of the American Museum of Natural History located outside Portal, Arizona.

- Avoidance areas in the Tombstone MOA should include the following federal public lands in Arizona:
 - Bureau of Land Management - Baker Canyon Wilderness Study Area (WSA), Guadalupe Canyon Area of Critical Environmental Concern (ACEC)
 - National Park Service - Chiricahua National Monument
 - US Forest Service - Coronado National Forest, Chiricahua Wilderness Area
 - US Fish and Wildlife Service – San Bernardino National Wildlife Refuge, Leslie Canyon National Wildlife Refuge.

- Avoidance areas in the Tombstone MOA should include the following federal public lands impacted in New Mexico and Arizona:
 - Bureau of Land Management - Central Peloncillo Mountains ACEC, Gray Peak WSA, Antelope Pass Research Natural Area (RNA) ACEC, Guadalupe Canyon ACEC, Guadalupe Canyon WSA, Alamo Hueco WSA, Alamo Hueco ACEC, Big Hatchet Mountains WSA, Big Hatchet Mountains ACEC, Cowboy Spring ACEC, Cowboy Spring WSA, Whitmire Canyon WSA
 - US Forest Service– Coronado National Forest – Bark Robinson WSA
 - Approximately 67 miles at the southern end of the Continental Divide National Scenic Trail.
 - National Audubon Society Animas Mountain Bird Conservation Area.

Outlaw, Jackal, Morenci, and Reserve MOAs

- San Carlos Apache Tribe (San Carlos Apache Reservation) and White Mountain Apache Tribe (Fort Apache Reservation) and rural communities under the MOAs could experience an increase in extreme noise and property damage due to the sonic booms and pressure waves from fighter jets allowed to reach supersonic speeds at significantly lower altitude (5000 ft. AGL to 10,000 ft. AGL down from 30,000 ft. MSL), as well as lowering the floor for aircraft training to 100 - 500 ft. AGL from 1500 – 5000 ft. AGL.

Because the pressure waves generated by supersonic flights at 5,000 - 10,000 ft. AGL fall within a range that can break glass, crack plaster, and collapse free-standing walls, evaluate the potential damage to property that will occur for Alternatives 2 - 4, as well as the impacts to residents, wildlife, recreation, cattle ranching activities, and other economic activities that occur in the area. Ecologically important areas like the BLM Areas of Critical Environmental Concern and the Gila Box Riparian National Conservation Area could be adversely affected by supersonic training at these low altitudes. The ecological impacts must be evaluated. Additionally, impacts of supersonic flights to the telescopes at the Mt. Graham International Observatory must be evaluated.

- The impact of increased military aircraft noise on communities, wildlife, tourism and recreation from an increase in the times of use - 6 am to 10 pm Monday through Friday and other times by a Notice to Airmen (NOTAM) - should be evaluated.

- Avoidance areas in the Outlaw, Jackal, Morenci, and Reserve MOAs should include the following federal public lands in Arizona:
 - Bureau of Land Management – Aravaipa Canyon Wilderness, Turkey Creek Riparian ACEC, Table Mountain RNA ACEC, Desert Grasslands RNA ACEC – Sombrero Butte, Bear Springs Badlands ACEC, North Santa Teresa Wilderness Area, Needles Eye Wilderness Area, White Canyon Wilderness Area, Fishhooks Wilderness Area, Gila Box Riparian National Conservation Area, 111 Ranch RNA ACEC.
 - US Forest Service - Coronado National Forest – Galiuro Wilderness, Santa Teresa Wilderness, Mt. Graham WSA, Mt. Graham International Observatory; Tonto National Forest - Superstition Wilderness, White Canyon Wilderness, Salt River Canyon Wilderness; Apache-Sitgreaves National Forest - Escudilla Wilderness, Mount Baldy Wilderness, Bear Wallow Wilderness.

- Avoidance areas in the Outlaw, Jackal, Morenci, and Reserve MOAs should include the following federal public lands in New Mexico:
 - BLM – Apache Box ACEC, Apache Box WSA
 - USFS – Gila National Forest - Blue Range Wilderness, Gila Wilderness, Hells Hole WSA, San Francisco Canyon WSA, Catwalk National Recreation Trail
 - 16 miles of the Continental Divide National Scenic Trail
 - The following stream segments proposed for Wild and Scenic River designation: Upper Frisco Box, Devil’s Creek, Mineral Creek, Whitewater Creek, Lower San Francisco River, Mule Creek, Galita Creek, Middle Fork Gila River (portions), West Fork Gila River (portions), Iron Creek, Spruce Creek, Willow Creek, West Fork Mogollon Creek, Mogollon Creek, and Indian Creek. The estimated mileage is 155 river miles.

Sells, Ruby, and Fuzzy MOAs

- The Tohono O’odham Nation could experience an extended period of military training every day with more extreme noise from the proposal to increase the times of use of the MOAs by 5 – 6 hours/day Monday through Friday and until midnight and other times by a Notice to Airmen (NOTAM).
- Impacts of extreme noise to people and wildlife for longer periods at night should be analyzed.
- Avoidance areas in the Sells, Ruby, Fuzzy MOAs should include the following federal public lands in Arizona:
 - Bureau of Land Management – Cuerda de Lena ACEC, Baboquivari Peak Wilderness Area, Baboquivari Peak ACEC
 - National Park Service – Organ Pipe Cactus National Monument
 - US Forest Service – Coronado National Forest – Pajarito Wilderness
 - USFWS – Buenos Aires National Wildlife Refuge

Bagdad and Gladden MOAs

- The proposed alternatives increase the times of use by 5 hours/day Monday through Friday, extending military aircraft noise until midnight, and other times by a Notice to Airmen (NOTAM).
 - The impacts to residents, wildlife, tourism, and recreation of military aircraft noise at night should be assessed.
 - Military aircraft will be permitted to fly as low as 500 ft. AGL (down from 5000 ft. AGL), increasing the noise and disturbance given lower altitude. Assess the impacts on local residents, wildlife, tourism, recreational values, ranching, and other economic activities of lowering the floor in Bagdad and Gladden MOAs to 500 ft. AGL.
 - Flares will be permitted to be released at 2000 ft. AGL (down from 5000 ft. AGL) increasing wildfire risk from flares not burning out before they hit the ground. “In Nevada, flare fires have occurred in areas where minimum release altitudes are 5,000 feet AGL.” A fire in Meadow Valley, for example, that burned 21,600 acres in 1993 was attributed to flare use by a BLM fire investigator. Environmental Effects of Self-Protection Chaff and Flares. | National Technical Reports Library The increased wildfire risk of allowing flares to be dropped from 2000 ft. AGL should be evaluated.
 - Avoidance Areas in the Bagdad and Gladden MOAs should include the following federal public lands in Arizona:
 - Bureau of Land Management – Arrastra Mountain Wilderness, Poachie Desert Tortoise Habitat ACEC, Burro Creek Riparian and Cultural ACEC, Three Rivers Riparian ACEC, Tres Alamos Wilderness, Harcuvar Mountains Wilderness, Rawhide Mountains Wilderness, East Cactus Plain Wilderness, Cactus Plain Wilderness Study Area, Swansea Historic District ACEC, Swansea Wilderness, Aubrey Peak Wilderness, McCracken Desert Tortoise Habitat ACEC, Upper Burro Creek Wilderness (West), Upper Burro Creek Wilderness (East), Harquahala Mountains Wilderness, Harquahala Mountains ACEC, Hummingbird Springs Wilderness, Big Horn Mountains Wilderness, Clay Hills Research Natural Area ACEC.
 - USFWS –Bill Williams River National Wildlife Refuge
20. Impacts to Commercial and Private Air Traffic Because the wake turbulence of low flying combat aircraft is a danger to small aircraft that fly at the same altitude, the impacts to private and commercial air traffic from the proposed action should be assessed.
21. Cumulative impacts Under the National Environmental Policy Act (NEPA), the Air Force must analyze how the Regional SUA Optimization proposal, when added to the existing use of MOAs, will impact southwest New Mexico and southern Arizona. The Regional SUA Optimization proposal can reasonably be expected to cause greater cumulative impacts when combined with the MOAs’ current use for domestic and international training missions.

Thank you for considering the comments of the undersigned organizations and businesses.
Please keep all of us on the list of interested parties as this process proceeds.

Sincerely,

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