

Air Force Proposes to Create Low Elevation Supersonic Airspace & Dramatically Increase Combat Training Across SE Arizona/SW New Mexico

Speak up to Protect Rural, Tribal Communities and Wilderness Areas from Dangerous Air Force Training! ([Public Hearings Link](#))

Written comment period for Draft Environmental Impact Statement ends October 9
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The United States Air Force is proposing to modify ten existing Military Operations Areas (MOAs) that stretch across southern Arizona into southwest New Mexico as part of their Special Use Optimization Strategy to expand low elevation combat training. The MOAs serve Luke Air Force Base in Phoenix, Morris Air National Guard Base in Tucson, and Davis-Monthan Air Force Base also in Tucson. The plan will authorize thousands of additional low-elevation fighter jet maneuvers and low elevation supersonic flights that cause sonic booms and impact dozens of rural communities, affect 30 tribes and pueblos with traditional ties to the area, and subject millions of acres of federal public lands, including national forests, the Continental Divide Trail, wilderness areas, national monuments and wildlife refuges, to increased noise, pollution, and risk of fire. **The proposal amounts to an attempt to turn an enormous swath of public, tribal and private lands in SE Arizona and SW New Mexico into a low elevation military training ground without regard for the economic, social, and cultural impacts on rural communities.**



Overall, the proposed alternative increases the number of low-level combat training missions in each of the 10 MOAs, the lowest, a 20% increase up to a 131% increase in the Tombstone MOA.

In seven MOAs, the flight floor for supersonic speeds (747.9+ mph) that cause sonic booms will be lowered from 30,000 feet mean sea level (MSL) to 5,000 feet AGL resulting in a five-fold increase in the sonic boom pressure on those below.

In five MOAs, fighter jets would be authorized to fly as low as 500 feet above ground level (AGL)

at speeds exceeding 600 miles per hour. The flight floor would be lowered to 100 feet AGL in the Tombstone MOA.

The areas authorized to drop burning flares and chaff have been expanded and in six MOAs dropping burning flares will be permitted at lower elevation - as low as 2,000 feet AGL. The number of permitted flares across all MOA's rises from an annual increase of 20% to up to 85% across the Tombstone MOA-dramatically increasing fire risks. The average annual usage of aluminized chaff bundles permitted is increased in each MOA, ranging from a 20% increase to a 38.8% in one MOA above Apache Tribal lands, and the Tombstone MOA changes from no chaff currently permitted to up to 7,000 bundles annually.

In all MOAs, the times of regular use would be extended to between 10pm and midnight.

The Air Force has not identified a compelling need for this dramatic increase in low elevation combat training.

SAMPLE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) COMMENTS

- The DEIS ignores the social and cultural impacts to tribal communities who will disproportionately experience the negative impacts from this proposal. Tribal communities were overlooked during the scoping period and the DEIS comment period and are absent from any of the Public Hearing locations. Three tribes, the Tohono O'odham Nation, White Mountain Apache Tribe, and San Carlos Apache Tribe, bear a disproportionate burden from the proposal since 5 of the MOAs are directly above millions of miles of Tribal lands and the impacts are so significant.
- The DEIS fails to offer a compelling reason why expanding low altitude combat training and lowering supersonic flight levels is warranted, given it states the Barry M Goldwater Range (BMGR) could provide all of its training needs with the addition of weekend scheduling. This is a much safer alternative than submitting dozens of communities and millions of acres of protected lands to significant increases in combat training sorties. The DEIS eliminates this alternative, shifts risks of low altitude combat training from the safer option - the BMGR - to rural and tribal communities who are unprepared for accidents and emergencies. The Air Force should reconsider the use of BMGR in the EIS.
- The DEIS minimizes the cumulative risk of fire from the substantial increase in the number of flares drops permitted. References and data regarding these risks is outdated and dismisses known cases of fire caused by military training, and ignores the rising threat of climate enhanced fires across the Desert Southwest. Communities and land agencies, ill-equipped to deal with large scale fire emergencies, are assigned to primary responsibility for crash response. No realistic plans for fighting a flare or crash fire are included in the plan.
- The DEIS dismisses possible impacts on the dozens of endangered and threatened species-particularly those with critical habitat below the airspace. The analysis does not adequately project the impacts of the increasing frequency of low-level jet flight on animal behavior- and thereby fails to consider the incremental and cumulative effects on these species - as is required by EIS regulations. The DEIS neglected to include NM Game and Fish as a consulting agency.
- The DEIS acknowledges that lowering the flight floor of supersonic jet flight to 5,000 ft (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 nationwide of broken car windshields, cracked foundations and dozens of recorded evidence of damaged houses. The Air Force should restrict low level supersonic flight to existing training grounds more suited for that level of risk.
- The DEIS analysis of noise is based on outdated research and needs to consider additional and more recent studies.
- The DEIS minimizes the effect on regional airspace needs within the developing civil aviation community.
- The Air Force has not responded to requests for information on the need for the optimization and has been unresponsive to existing noise and disturbance complaints from communities below their airspace.

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