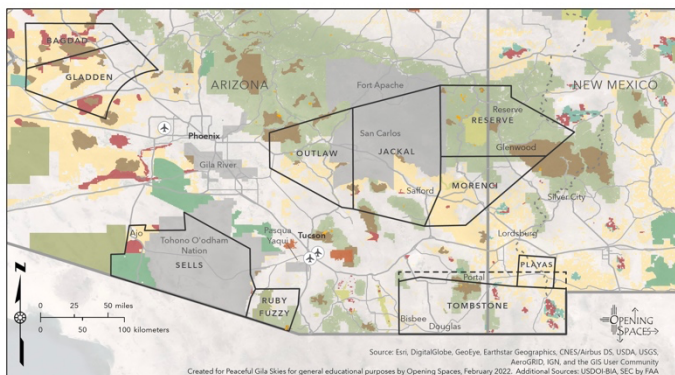


Air Force Releases Plan for Low-Elevation, Supersonic Combat Training Across Southeast Arizona/Southwest New Mexico

Speak up to Protect Rural and Tribal Communities and Wilderness Areas from Dangerous Air Force Training!

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, and Morris Air National Guard Base and Davis-Monthan Air Force Base 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 southern Arizona and southwest New Mexico into a low elevation military training ground without regard for the economic, social, and cultural impacts on rural communities.**

Federal public lands that could be affected by the Air Force proposal include four National Forests (Gila, Apache-Sitgreaves, Tonto, Coronado), 12 US Forest Service Wilderness Areas; 3 US Forest Service Wilderness Study Areas; 18 Bureau of Land Management (BLM) Wilderness Areas, 9 BLM Wilderness Study Areas, 22 BLM Areas of Critical Environmental Concern (ACEC), 4 BLM Research Natural Areas (RNA); 1 BLM Riparian National Conservation Area (Gila Box); 4 National Wildlife Refuges (Buenos Aires, Leslie Canyon, San Bernardino, and Bill Williams River) and 2 National Monuments (Chiricahua National Monument and Organ Pipe Cactus National Monument). Additionally, 83 miles of the Continental Divide National Scenic Trail and the Catwalk National Recreation Trail could be affected.



FEDERAL PUBLIC LANDS & TRIBES AFFECTED BY AIR FORCE ARIZONA REGIONAL SPECIAL USE AIRSPACE OPTIMIZATION

- | | | | |
|--|--|--|--|
| ■ Federal Public Lands | ■ National Wildlife Refuge | | |
| ■ Area of Critical Environmental Concern | ■ BLM Public Lands | | |
| ■ Conservation Area | ■ Research Natural Area | | |
| ■ National Forest | ■ Wilderness Area | | |
| ■ National Monument | ■ Wilderness Study Area | | |
| ■ National Park | | | |

There are 10 MOAs in this region, occupying airspace over more than 32,000 square miles of desert, grasslands, forests, farms, ranches, towns and cities.

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 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.

In seven MOAs, the flight floor for supersonic speeds (747.9+ mph) that cause sonic booms would 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.

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 chaff bundles (each bundle contains 5.0 – 5.6 million aluminum-covered silica

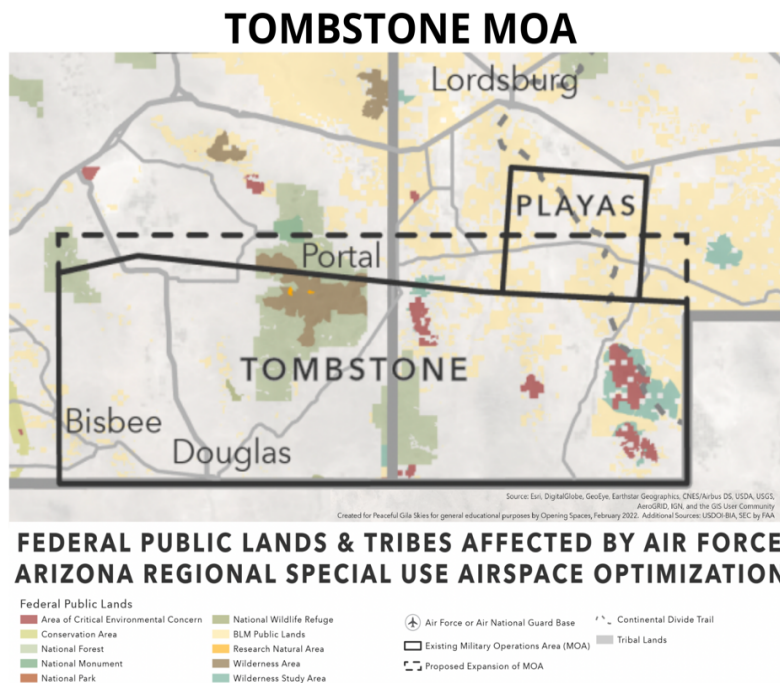
fibers) permitted is increased in each MOA, ranging from a 20% increase to a 38.8% in one MOA above Apache Tribal lands. The Tombstone MOA changes from no chaff currently permitted to up to 7,000 bundles annually. In all MOAs, the times of regular use would be extended to between 10pm and midnight.

***Tell the Air Force that expanding military combat training over rural communities and tribal and public lands is not acceptable.**

***The Air Force should restrict its lower elevation and supersonic flights, and other combat training, such as dropping chaff and flares, to the Barry M Goldwater Range where it's already happening.**

***The Air Force must not shift the burden of risk to rural and tribal communities in southern AZ and southwest NM.**

The following discussion outlines the details of the proposed action and principal concerns by MOA.



MOA	Attributes and Operations ¹	1 - No Action	2 - Proposed Action
Tombstone	Times of Use	0600-2100 M-F; other times by NOTAM	0600-2100 daily, other times by NOTAM
	Horizontal Dimensions	3,968 sqmi	4,766 sqmi
	Vertical Dimensions	A and B: 500 feet AGL to 14,500 feet MSL C: 14,500 feet MSL to FL180	Combine A,B,C: 100 feet AGL to FL180
	Chaff/Flare Authorization (minimum release altitude)	No/Yes (5,000 feet AGL)	Authorize chaff; 2,000 feet AGL minimum release
	Supersonic Authorization	30,000 feet MSL	5,000 feet AGL
	Annual sorties	3,450	+4,550 (8,000 total)
	Day/Night Percent	89 / 11	No change
	Percent Including Supersonic	0	1
	Chaff/Flare Annual Usage	0 / 16,240	7,000 / 30,000

The Tombstone MOA Proposed Action:

- Expands the existing Tombstone MOA for an additional 798 square miles.
- Increases the number of combat training flights (sorties) permitted in the Tombstone MOA up to 131% for a total of 8,000 sorties annually.
- Increases the area of federal lands impacted by the proposal, especially in the southern end of Chiricahua National Monument.

- **Increases the times of use** for the MOA from 6 am – 9 pm during the weekdays to also include the weekends. This increase will negatively impact tourism and recreation values.
- There will be an **increase in extreme noise due to sonic booms** from fighter jets allowed to exceed supersonic speeds at significantly lower altitude (5000 AGL floor down from 30,000 MSL). The pressure wave generated by supersonic flights at 5,000 feet above ground level fall within a range that can break glass, crack plaster, and collapse free standing walls.
- There will be an **increase in extreme noise from military aircraft training as low as 100 ft AGL**.
- The Air Force proposes to **authorize release of chaff** in the Tombstone MOA. Currently, use of chaff is not permitted. This authorization will allow release of up to 7,000 bundles of chaff containing 5 to 5.6 million aluminum-covered silica fibers per bundle, polluting our environment.
- As many as **30,000 flares per year (up from 16,240) 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.
- The Air Force did not adequately assess the **range of impacts to important birding areas** in the Chiricahuas (e.g. Cave Creek) and the research conducted by the Southwestern Research Station of the American Museum of Natural History located outside Portal.
- **Federal public lands In Arizona impacted by the proposal**
 - 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 in Chiricahua and Dragoon Mountains, Chiricahua Wilderness
 - US Fish and Wildlife Service – San Bernardino National Wildlife Refuge, Leslie Canyon National Wildlife Refuge.
- **Federal public lands in New Mexico impacted by the proposal**
 - 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 – Peloncillo Mountains, Bark Robinson WSA
 - Approximately 67 miles at the southern end of the Continental Divide National Scenic Trail lie within the Tombstone MOA.
- National Audubon Society Animas Mountain Bird Conservation Area is located within the Tombstone MOA.

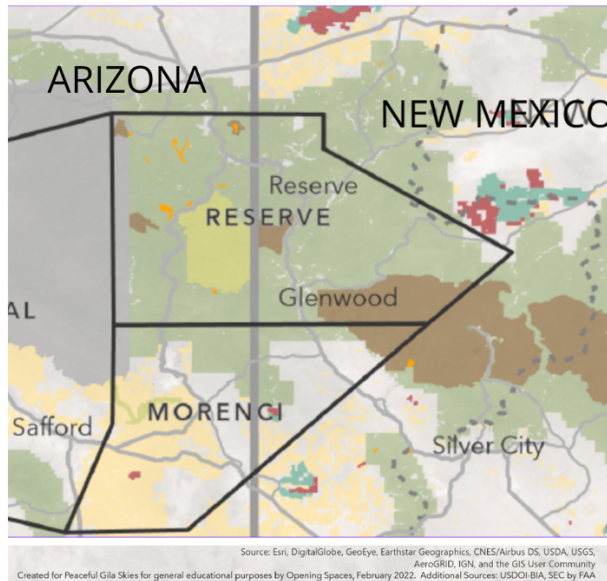
Public Comments on the Proposed Action for Tombstone MOA

- By creating a low altitude combat training ground across two states, dozens of sensitive resource areas, and multiple towns and cities that depend on tourism as the basis of their economy, the DEIS fails to acknowledge or analyze the resulting negative impacts on the socio-economic fabric of these communities.
- 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, such as the Barry M Goldwater Range, which is more suited for that level of risk.
- More than doubling the military training activity above these communities will negatively impact wildlife, domestic animals, real estate values and create conflicts with existing land use such as traditional ranching and farming, degrading the quality of life. These social, cultural and economic impacts have not been properly measured or analyzed by the existing DEIS, thereby minimizing the risks and negative consequences.
- The Tombstone MOA, one of the smallest of the 10, is being positioned to receive the most significant increase of chaff and flare use, and consequently, an environment most heavily polluted by the dispersal of chaff fibers in an area heavily used recreationally. The dramatic rise in the number of flares increases the risk of wildfire in areas

already vulnerable to wildfire and with limited resources for firefighting. The DEIS fails to acknowledge any increased risk of fire and uses 30-year-old data to analyze the likelihood of fires from flares or crashes and places the burden for the initial emergency response on local resources.

- Lack of meetings within communities affected delegitimizes the DEIS process, disenfranchising the people who are impacted most by the proposed changes. Offering virtual meetings as an alternative has been shown to be considerably less effective at engaging rural communities. Complaints about current fighter jet incursions into unauthorized airspace above the town of Portal have gone unanswered by the Air Force bases in Tucson.

RESERVE AND MORENCI MOAS



FEDERAL PUBLIC LANDS & TRIBES AFFECTED BY AIR FORCE ARIZONA REGIONAL SPECIAL USE AIRSPACE OPTIMIZATION



MOA	Attributes and Operations ¹	1 - No Action	2 - Proposed Action
Morenci	Times of Use	0600-2100 M-F; other times by NOTAM	0600-2200 M-F, other times by NOTAM
	Horizontal Dimensions	2,325 sqmi	No change
	Vertical Dimensions	1,500 feet AGL to FL180	No change
	Chaff/Flare Authorization (minimum release altitude)	Yes/Yes (2,000 feet AGL)	No change
	Supersonic Authorization	30,000 feet MSL	5,000 feet AGL
	Annual sorties	3,350	+700 (4,050 total)
	Day/Night Percent	90 / 10	No change
	Percent Including Supersonic	11	No change
	Chaff/Flare Annual Usage	13,950 / 13,460	16,920 / 16,330
Reserve	Times of Use	By NOTAM	0600-2200 M-F, other times by NOTAM
	Horizontal Dimensions	3,348 sqmi	No change
	Vertical Dimensions	5,000 feet AGL to FL180	No change
	Chaff/Flare Authorization (minimum release altitude)	Yes/Yes (5,000 feet AGL)	No change
	Supersonic Authorization	30,000 feet MSL	5,000 feet AGL
	Annual sorties (used with Morenci)	--	--
	Day/Night Percent	--	--
	Percent Including Supersonic	--	--
	Chaff/Flare Annual Usage	--	--

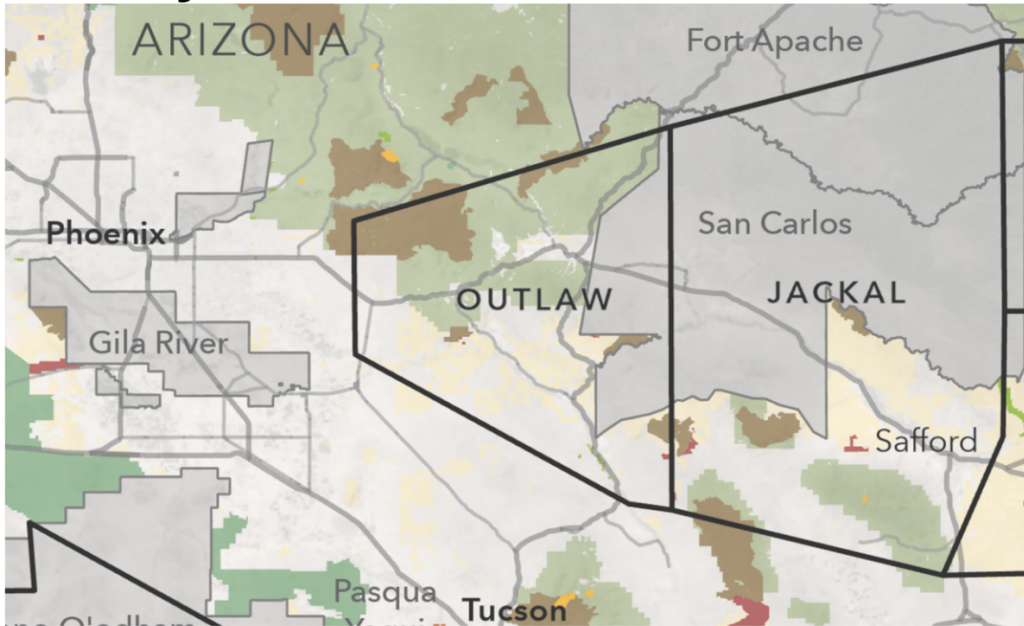
Proposed Action for Morenci and Reserve MOAs:

- **Lowers elevation of supersonic flights** of fighter jets within both MOAs from 30,000 ft. down to 5,000 feet above ground level (AGL). These flight paths cross over the majority of the Apache-Sitgreaves National Forest, and a significant portion of the Gila National Forest. Notable areas include the Blue Primitive Area, almost half of the Gila Wilderness, the Catwalk National Scenic Trail in Glenwood, The Cosmic Campground, portions of the Continental Divide National Scenic Trail, and multiple river sections included in the proposed Wild and Scenic designation for the Gila River and the San Francisco River.
- **Increases the number of combat training flights (sorties)** permitted in the two MOAs up to 20% for a total of 4,000 sorties annually and the hours that low altitude training is permitted has expanded.
- **Increases the number of bundles of chaff** used in evasive maneuvers up to 21% to 16,920 bundles. Each bundle contains 5.0 – 5.6 million aluminum-coated silica fibers, dispersing pollution throughout our environment.
- **Raises the average annual use of flare cartridges** by up to 21% resulting in over 16,000 dropped flares annually, targeted over millions of acres of highly flammable forest lands.
- The impact of increased military aircraft noise on communities from an **increase in the times of use** - 6 am to 10 pm Monday through Friday will have an impact on quality of life in these areas.
- **Federal public lands impacted in Arizona**
 - US Forest Service -Coronado National Forest – Mt Graham, Apache Sitgreaves National Forest, Escudilla Wilderness, Mount Baldy Wilderness, Bear Wallow Wilderness, Blue Range Primitive Area, Lee Valley Recreation Area, Williams Lake Recreation Area, Big Lake Recreation Area.
- **Federal public lands impacted 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 is in the Reserve MOA.

Public Comments on the Proposed Action for Morenci and Reserve MOAs

- The DEIS acknowledges that lowering the flight floor of supersonic jet flight to 5,000 ft (AGL) from 30,000 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 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 such as the Barry M Goldwater range, and the existing MOA's where supersonic flight is already authorized, both of which are more suited for that level of risk.
- Increasing military training activity above these communities will negatively impact wildlife, domestic animals, real estate values and create conflicts with existing land use such as traditional ranching and farming, degrading the quality of life. These social, cultural and economic impacts have not been properly measured or analyzed by the existing DEIS, thereby minimizing the risks and negative consequences.
- The increase in the dispersal of chaff fibers in an environment heavily used recreationally and prized for its pristine forests and waters is irresponsible. The substantial rise in the number of flares increases the risk of wildfire in areas already vulnerable to wildfire and with limited resources for firefighting. The DEIS fails to acknowledge any increased risk of fire and uses 30-year-old data to analyze the likelihood of fires from flares or crashes and places the burden for the initial emergency response on local resources.
- The DEIS fails to offer a compelling reason why expanding low altitude combat training and lowering supersonic flight levels is warranted. Using the Barry M Goldwater Range (BMGR) is a safer choice given they are better prepared for accidents and emergencies than rural and tribal communities.
- 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 within the Gila region.
- 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.

JACKAL AND OUTLAW MOAs



FEDERAL PUBLIC LANDS & TRIBES AFFECTED BY AIR FORCE ARIZONA REGIONAL SPECIAL USE AIRSPACE OPTIMIZATION



MOA	Attributes and Operations ³	1 - No Action	2 - Proposed Action
Outlaw	Times of Use	0700-1800 M-F 1800-2200 M-F by NOTAM Intermittent weekends by NOTAM	0600-2200 M-F, other times by NOTAM
	Horizontal Dimensions	2,627 sqmi	No change
	Vertical Dimensions	8,000 feet MSL or 3,000 feet AGL (whichever is higher) to FL180	500 feet AGL to FL180
	Chaff/Flare Authorization (minimum release altitude)	Yes/Yes (3,000 feet AGL)	2,000 feet AGL minimum release
	Supersonic Authorization	30,000 feet MSL	5,000 feet AGL
	Annual sorties	5,190	+1,420 (6,610 total)
	Day/Night Percent	89 / 11	No change
	Percent Including Supersonic	12	14
	Chaff/Flare Annual Usage	17,690 / 19,050	24,560 / 26,460
	Jackal	Times of Use	0700-1800 M-F 1800-2200 M-F by NOTAM Intermittent weekends by NOTAM
Horizontal Dimensions		4,714 sqmi	No change
Vertical Dimensions		Jackal Low: 100 feet AGL to 11,000 feet MSL or 3,000 feet AGL (whichever is higher) Jackal MOA: 11,000 feet MSL or 3,000 feet AGL (whichever is higher) to FL180	Low: 100 feet AGL to 500 feet AGL Jackal MOA: 500 feet AGL to FL180
Chaff/Flare Authorization (minimum release altitude)		Yes/Yes (3,000 feet AGL)	2,000 feet AGL minimum release
Supersonic Authorization		30,000 feet MSL	5,000 feet AGL
Annual sorties (used with Outlaw)		--	--
Day/Night Percent		--	--
Percent Including Supersonic		--	--
Chaff/Flare Annual Usage		--	--

Proposed Action for Outlaw and Jackal MOAs:

- **Lowers the floor for supersonic jet flight** from the current 30,000 MSL to as low as 5,000 feet AGL (above ground level) with measurable increases in noise and sonic booms, a 5-fold increase in wave pressure from the sonic booms.
- **Lowers the floor for low-altitude, fighter jet combat training**, from the current 3000 AGL to as low as 500 feet

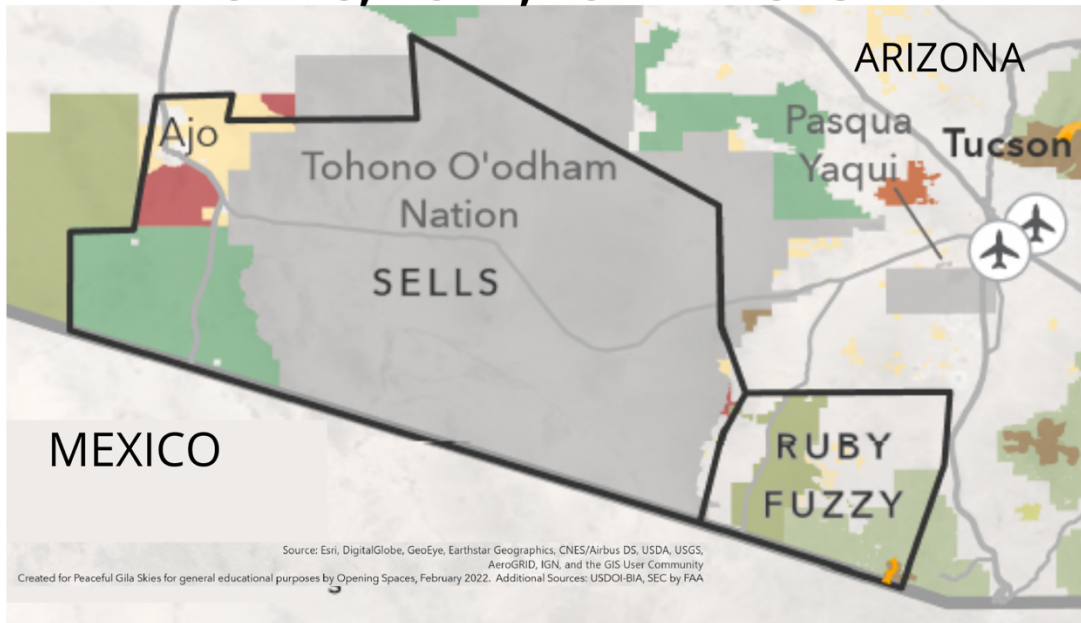
AGL in the Outlaw MOA and maintains a low of 100 feet AGL across parts of the Jackal MOA.

- In the combined MOAs of Outlaw and Jackal, **increases the number of combat training sorties** up to 27% for a total of 6610 potential yearly missions.
- **Lowers the permitted release altitude of chaff and flares** from 3,000 AGL to 2,000 feet AGL and the **increases annual quantities of chaff bundles** (5.0 – 5.6 million aluminum-covered silica fibers per bundle) released to 24,560, a 38% increase, **and flares** released to 26,460 - a 39% increase.
- **Increases the times of use** from the current times of 7am through 6pm (M-F), to the expanded hours of 6:00am to 10:00pm (M-F).
- **Federal public lands in Arizona impacted by the proposal include:**
 - 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 – Mt Graham, Galiuro Mountains, Santa Teresa Mountains; Galiuro Wilderness, Santa Teresa Wilderness; Tonto National Forest - Superstition Wilderness, White Canyon Wilderness, Salt River Canyon Wilderness; Apache Sitgreaves National Forest, Escudilla Wilderness, Mount Baldy Wilderness, Bear Wallow Wilderness.

Public Comments on the Proposed Action for Outlaw and Jackal MOAs:

- Supersonic flights will cause periods of extreme noise and sonic booms above tribal communities and some of the Southwest's beloved wilderness areas and national monuments, impacting the tourism and outdoor economies in the region.
- While the pressure wave generated by supersonic flights at 5,000 – 10,000 feet AGL can break glass, crack plaster, and collapse free standing walls, the DEIS claims no negative impacts will occur to existing structures beneath these events because it uses unreliable data.
- Allowing combat training maneuvers as low as 100 feet AGL proposed for San Carlos Apache and White Mountain Apache lands will impact wildlife, domestic animals, and create conflicts with existing land use, such as traditional ranching and farming, degrading the quality of life. These social, cultural and economic impacts have not been properly measured or analyzed by the DEIS, thereby minimizing the risks.
- The proposed changes cover the majority of San Carlos and White Mountain Reservation lands, including the airspace over Mount Graham, Oak Flat, and other sites of cultural importance to the Apache people. Increased noise and disturbances will undermine sacred places. Areas of significance to the Apache people must be excluded and avoidance zones created to protect cultural and environmental resources.
- The release of chaff on San Carlos Apache lands pollutes the environment with aluminum-coated silica fibers and the proposal lowering the dropping of flares above Apache lands increases the risk of wildfire in areas already vulnerable to catastrophic wildfire and with limited resources for firefighting. The DEIS fails to acknowledge any increased risk of fire and uses thirty-year-old data to analyze the likelihood of fires from flares or crashes and places the burden for the initial emergency response on local resources.
- The times for the use of airspace would be extended into the evening hours disturbing families and communities.
- Lack of meetings within tribal communities delegitimizes the DEIS process, disenfranchising the people who are impacted most by the proposed changes. Offering virtual meetings as an alternative has been shown to be considerably less effective at engaging rural communities.

SELLS, RUBY, FUZZY MOAs



FEDERAL PUBLIC LANDS & TRIBES AFFECTED BY AIR FORCE ARIZONA REGIONAL SPECIAL USE AIRSPACE OPTIMIZATION



MOA	Attributes and Operations ¹	1 - No Action	2 - Proposed Action
Sells	Times of Use	0600-1900 M-F, other times by NOTAM	0600-0000 M-F, other times by NOTAM
	Horizontal Dimensions	4,854 sqmi	No change
	Vertical Dimensions	Low: 3,000 feet AGL to 10,000 feet MSL Sells: 10,000 feet MSL to FL180	No change
	Chaff/Flare Authorization (minimum release altitude)	Yes/Yes (3,000 feet AGL)	No change
	Supersonic Authorization	10,000 feet MSL	No change
	Annual sorties	14,790	+3,020 (17,810 total)
	Day/Night Percent	85 / 15	No change
	Percent Including Supersonic	60	No change
	Chaff/Flare Annual Usage	31,490 / 34,560	37,890 / 41,580
	Ruby	Times of Use	0600-1900 M-F; other times by NOTAM
Horizontal Dimensions		770 sqmi	No change
Vertical Dimensions		10,000 feet MSL to FL180	No change
Chaff/Flare Authorization (minimum release altitude)		Yes/Yes (2,000 feet AGL)	No change
Supersonic Authorization		Not authorized	No change
Annual sorties		5,490	+2,120 (7,610 total)
Day/Night Percent		90 / 10	No change
Percent Including Supersonic		0	No change
Chaff/Flare Annual Usage		20,890 / 20,770	28,450 / 28,280
Fuzzy		Times of Use	0700-1900 daily; other times by NOTAM
	Horizontal Dimensions	588 sqmi	No change
	Vertical Dimensions	100 feet AGL to 10,000 feet MSL	No change
	Chaff/Flare Authorization (minimum release altitude)	Yes/Yes (2,000 feet AGL)	No change
	Supersonic Authorization	Not authorized	No change
	Annual sorties (used with Ruby)	--	--
	Day/Night Percent	--	--
	Chaff/Flare Annual Usage	--	--

Proposed Action for the Sells, Ruby, Fuzzy MOA:

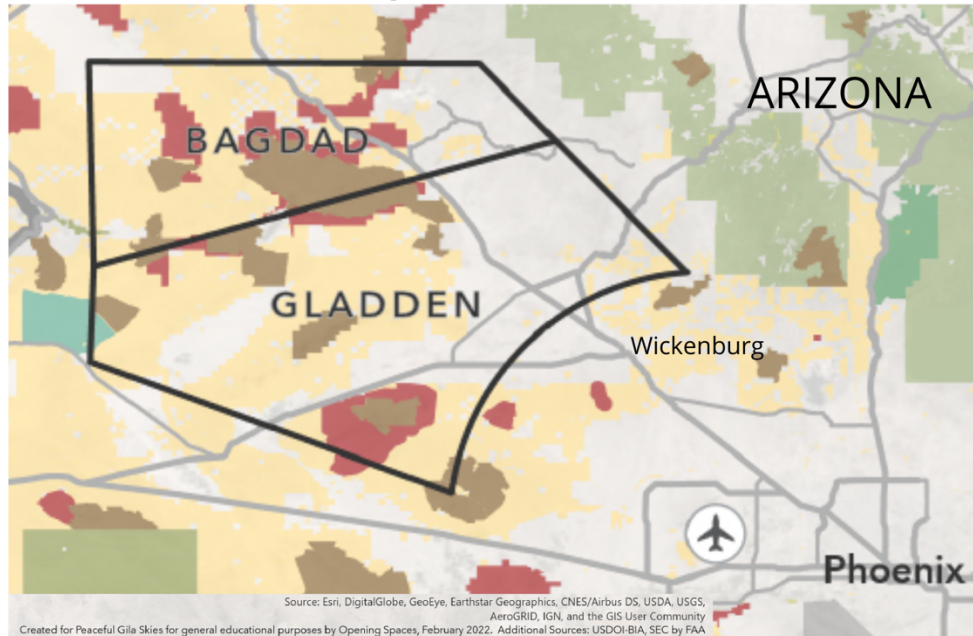
- Increases the number of annual combat training flights (sorties) increases by up to 20% for a potential total of 17,810. including over 1,000 transient aircraft from other bases. In the Ruby/Fuzzy MOA up to 38.6% additional sorties annually will be permitted to fly over Arivaipa Canyon.

- **Increases the permitted annual quantities of chaff bundles and dropped flares** by up to 36% in the Ruby/Fuzzy MOA and up to 20% in the Sells MOA.
- **Increases the hours of authorized use** from the current times of 7am through 6pm (M-F), to the expanded hours of 6:00am to 12pm midnight (M-F), negatively impacting quality of life.
- **Federal public lands impacted In Arizona include:**
 - 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 Mountains; Pajarito Wilderness
 - USFWS – Buenos Aires National Wildlife Refuge

Public Comments on the Sells, Ruby, Fuzzy MOA Proposed Action

- The proposed changes cover the majority of Tohono O’odham lands including sites of cultural importance. Increased noise and disturbances will disturb communities and undermine sacred places. Areas of significance to the Tohono O’odham people must be excluded and avoidance zones created to protect cultural and environmental resources.
- The release of chaff on Tohono O’odham lands pollutes the environment with aluminum-coated silica fibers and the proposal increasing the number of flares dropped increases the risk of wildfire in areas already vulnerable to wildfire and with limited resources for firefighting. The DEIS fails to acknowledge any increased risk of fire and uses 30-year-old data to analyze the likelihood of fires from flares or crashes and places the burden for the initial emergency response on local resources.
- The times for the use of airspace would be extended into the evening hours disturbing families and communities.
- Allowing this significant increase in combat training maneuvers proposed for Tohono O’odham lands will impact wildlife, domestic animals, and create conflicts with existing land use such as traditional ranching and farming, degrading the quality of life. These social, cultural and economic impacts have not been properly measured or analyzed by the existing DEIS, thereby minimizing the risks.
- Lack of meetings within tribal communities delegitimizes the DEIS process, disenfranchising the people who are impacted most by the proposed changes. Offering virtual meetings as an alternative has been shown to be considerably less effective at engaging rural communities.
- The DEIS fails to offer a compelling reason why expanding low altitude combat training and lowering supersonic flight levels is warranted. Using the Barry M Goldwater Range (BMGR) is a safer choice given they are better prepared for accidents and emergencies than rural and tribal communities.

BAGDAD, GLADDEN MOAs



FEDERAL PUBLIC LANDS & TRIBES AFFECTED BY AIR FORCE ARIZONA REGIONAL SPECIAL USE AIRSPACE OPTIMIZATION



MOA	Attributes and Operations ¹	1 - No Action	2 - Proposed Action
Bagdad	Times of Use	0600-1900 M-F; other times by NOTAM	0600-0000 M-F, other times by NOTAM
	Horizontal Dimensions	1,410 sqmi	No change
	Vertical Dimensions	7,000 feet MSL or 5,000 feet AGL (whichever is higher) to FL180	500 feet AGL to FL180
	Chaff/Flare Authorization (minimum release altitude)	Yes/Yes (5,000 feet AGL)	2,000 feet AGL minimum release
	Supersonic Authorization	10,000 feet MSL	No change
	Annual sorties	6,920	+2,200 (9,120 total)
	Day/Night Percent	88 / 12	No change
	Percent Including Supersonic	65	66
	Chaff/Flare Annual Usage	14,390 / 15,570	19,050 / 20,610
	Gladden	Times of Use	0600-1900 M-F; other times by NOTAM
Horizontal Dimensions		2,476 sqmi	No change
Vertical Dimensions		7,000 feet MSL or 5,000 feet AGL (whichever is higher) to FL180	500 feet AGL to FL180
Chaff/Flare Authorization (minimum release altitude)		Yes/Yes (5,000 feet AGL)	2,000 feet AGL minimum release
Supersonic Authorization		10,000 feet MSL	No change
Annual sorties (used with Bagdad)		--	--
Day/Night Percent		--	--
Percent Including Supersonic		--	--
Chaff/Flare Annual Usage		--	--

Proposed Action for the Bagdad and Gladden MOAs:

- **Increases the number of combat training missions permitted** in the two MOAs by up to 32% for a total of 9,120 sorties, including 66% which could include supersonic flight at 10,000 ft MSL (mean sea level).
- **Lowers the flight floor** of both MOAs from 7,000 ft above ground level (AGL) to 500 ft AGL across the entire airspace allowing for thousands of low altitude combat sorties over the area.
- **Increases the number of bundles of chaff**, aluminum coated silica fibers used in evasive maneuvers, by up to 32% to 19,050. The average annual use of flare cartridges is also increased up to 32% resulting in over 20,600

dropped flares annually, targeted over millions of acres of highly flammable forest lands.

- **Lowens the altitude at which flares can be dropped** from 5,000 ft to 2,000 ft.
- **Expands the proposed time of use** of both MOAs from 6am-6pm, to 6am-midnight, five days a week, extending military aircraft noise late into the night.
- **Federal public lands in Arizona impacted by the proposed action include:**
 - 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

Public Comments on the Bagdad and Gladden MOA

- Increasing military training activity above these communities will negatively impact wildlife, domestic animals, real estate values and create conflicts with existing land use such as traditional ranching and farming, degrading the quality of life. These social, cultural and economic impacts have not been properly measured or analyzed by the existing DEIS, thereby minimizing the risks and negative consequences.
- The DEIS analysis of supersonic flight is flawed when it concludes there will be no increase in negative impacts, despite increasing evidence nationwide of broken windshields, cracked foundations and dozens of recorded examples of damaged houses. The Air Force should limit supersonic flights over populated areas, utilizing the existing training grounds at the Barry M Goldwater range for these trainings needs.
- The impact of lowering the altitude of combat training will be felt by everyone living below this airspace including thousands of school children, families, and veterans who may suffer from PTSD. During these low altitude training maneuvers, the risk of crashes and catastrophic accidents increases.
- An increase in the dispersal of aluminum chaff fibers is irresponsible. The DEIS completely ignores any possibility of pollution or contamination of waters. The lowering of the altitude flares can be dropped, along with the substantial rise in the number of flares, increases the risk of wildfire in areas already vulnerable to wildfire and with limited resources for firefighting. The DEIS fails to acknowledge any increased risk of fire and uses 30-year-old data to analyze the likelihood of fires from flares or crashes and places the burden for the initial emergency response on local resources.
- The towns and cities below the MOAs are already subjected to thousands of training hours annually. Expanding operating hours is an undue intrusion on communities.
- The DEIS fails to offer a compelling reason why expanding low altitude combat training and lowering supersonic flight levels is warranted. Using the Barry M Goldwater Range (BMGR) is a safer choice given they are better prepared for accidents and emergencies than rural and tribal communities.
- 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.

**SPEAK UP TO PROTECT RURAL AND TRIBAL COMMUNITIES AND WILDERNESS AREAS
FROM DANGEROUS AIR FORCE TRAINING!**

Submit Public Comments on the Draft Environmental Impact Statement (DEIS)

The Air Force has released its draft Environmental Impact Statement for Arizona Special Use Air Space Optimization for public review and comment. The public comment process is an opportunity for citizens to provide input on a proposed action and alternatives under the National Environmental Policy Act. Comments can include statements of opposition to the proposed action, critique of the DEIS analysis, suggestions for alternatives, errors in fact or omissions, new information, and environmental concerns.

Attend public hearings to deliver your comment in person or submit comments electronically. The outline below provides some sample DEIS comments to help with developing your own substantive comments.

IN-PERSON PUBLIC HEARINGS

Ajo, AZ: August 26, 2024, 5pm – 8pm, Ajo High School, 111 N. Well Rd, Ajo, AZ

Superior, AZ: August 27, 2024, 5pm – 8pm, Best Western Gold Canyon Inn & Suites, 8333 E. Sunrise Sky Dr, Gold Canyon, AZ

Bagdad, AZ: August 28, 2024, 5pm – 8pm, Bagdad High School, 500 Sultan Way, Bagdad, AZ

Wickenburg, AZ: August 29, 2024, 5pm – 8pm, Wickenburg Community Center, 160 N. Valentine St., Wickenburg, AZ

Morenci, AZ: September 9, 2024, 5pm – 8pm, Morenci Club Hall, 314 Plaza Dr., Morenci, AZ

Reserve, NM: September 10, 2024, 5pm – 8pm, Reserve Community Center, Mountaineer Rd., Reserve, NM

Silver City, NM: September 11, 2024, 5pm – 8pm, WNMU Global Resource Center, 12th & Kentucky St., Silver City, NM

Lordsburg, NM: September 12, 2024, 5pm – 8pm, Baxter Civic Center, 313 E 4th St., Lordsburg, NM

Animas, NM: September 13, 2024, 5pm – 8pm, Animas High School, 1 Panther Blvd., Animas, NM

VIRTUAL PUBLIC HEARINGS

September 4, 2024, 5:00 – 8:00 pm Mountain Standard Time (Most of Arizona Local)

Register at: https://us06web.zoom.us/webinar/register/WN_7ZDU4THMTU2G0tithAJ6eA#/registration

September 5, 2024, 5:00 – 8:00 pm Mountain Daylight Time (New Mexico Local)

Register at: https://us06web.zoom.us/webinar/register/WN_kQ175YxwSB2oD-Da9PBBMQ#/registration

SUBMIT YOUR COMMENTS ELECTRONICALLY

Submit your public comments to the Air Force by October 9, 2024 at:
www.arizonaregionalairspaceeis.com/comments/

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 square 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 subjecting 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 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 management 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.

Submit Your Public Comments on Air Force Arizona Missions Combat Training Airspace Draft Environmental Impact Statement

The Air Force has asked for public comments on its proposed action to optimize Special Use Airspace for low-level and supersonic combat training in southern Arizona and southwest New Mexico. The plan proposes to turn this area into an enormous low-level military training ground without any regard for the economic, social, and cultural impacts on rural communities and tribes.

Submit your public comments to the Air Force by October 9, 2024 at:
www.arizonaregionalairspaceeis.com/comments/

For more information, contact Peaceful Gila Skies
www.peacefulgilaskies.com | 575.538.8078 | peacefulgilaskies@gmail.com

Peaceful Gila Skies is a coalition of business owners, community leaders, sportsmen, veterans, concerned citizens, and conservation groups -- Center for Biological Diversity, Gila Conservation Coalition, Gila Resources Information Project, Heart of the Gila, New Mexico Wild, and Upper Gila Watershed Alliance -- united in our opposition to the expansion of military training over the Gila region.