

I am writing to register my opposition to the Department's plan to expand the horizontal range and the frequency and intensity of operations within ten southwest Military Operations Areas, as announced in the DEIS for Regional Special Use Airspace Optimization of Airspace to Support Air Force Missions in Arizona.

I object to the plan as regards all ten MOAs and, in particular, as it pertains to the Tombstone MOA under which I reside.

Specifically, I object to proposed increase in number and times of airspace use; increased horizontal dimensions of airspace; lowering of the floor for low-altitude training; lower altitudes for supersonic speed; use of chaff; and lowering the release altitude for flares.

I object on grounds that the Department has not adequately considered a variety of issues, including safety; noise; air quality; natural resources; land management and recreation; socioeconomics; environmental justice; cultural resources; hazardous materials; and visual effects.

Far from adequately addressing these issues, the proposed plan understates and in some cases evidently ignores the adverse effects the proposed actions would have on the human and non-human populations in the target areas.

This inadequacy is amplified by the Department's failure to hold even one public meeting in southern Arizona prior to issuing of the DEIS, though many of the greatest impacts of the proposed expansions would be in the basins and mountain ranges here.

From the DEIS, one could conclude that Willcox, Benson, Pearce, Sunsites, Elfrida, Bowie, Portal, Bisbee, Douglas, Sierra Vista, Tombstone et al are ghost towns rather than home to thousands. One could get the impression that the lives and livelihoods of people in and around these communities, and in sovereign Tribal lands, don't matter or that we're immune to the sudden, abrupt, deafening roar of jets and out of the blue (or worse, night sky) sonic booms, the pollution, the risk of wildfires

One could think that domestic and wild animals, including the many threatened and endangered species our region is known for, are not adversely affected by the same impacts that people are, their breeding and feeding patterns and other behaviors even more disrupted than ours.

One could infer that recreationists and eco-tourists who, like many residents, come here for the peace and serenity of open space and natural environment (especially in our many protected wilderness and special conservation areas, national monuments and wildlife refuges) are not dismayed and thereby more or less disinclined to return, posing significant economic loss to the region.

And one might be led to consider not at all the negative implications for the mental and physical health of the many retirees and others who live here precisely because of the relative peace and quiet of rural life, including not a few who have relocated here for medical reasons, specifically to escape the kind of unhealthy, high-decibel, terrifying onslaughts low-altitude fighter-bomber flights entail.

Instead of seeking to expand space and operations in the ten MOAs, the Department should redesign its current use plan at, and confine its combat training operations to, the Goldwater

Range where combat training flights from Davis-Monthan, Luke and Morris are already routine and where more could easily be accommodated without the increased hazards, risks and disruptions the proposed plan would cause.