



WILDERNESS WATCH

Keeping Wilderness Wild

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March 3, 2022

Arizona Regional Airspace EIS
501 Butler Farm Rd., Suite H
Hampton, VA 23666

Sent via: <https://www.arizonaregionalairspaceeis.com/comments/>

Dear U.S. Air Force Staff,

The following comments on the Draft EIS for the Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona come from Wilderness Watch. Wilderness Watch is a national wilderness conservation organization focused on the protection and proper stewardship of all units of the National Wilderness Preservation System, including the Wildernesses over which you propose to fly low-level supersonic jets.

Wilderness Watch strongly opposes the proposed changes for Arizona and New Mexico airspaces detailed in the Draft EIS. Such activity would shatter the area's natural sounds, ruin the wilderness experience for visitors, and stress native wildlife.

Either select Alternative 1 (the No-Action alternative) or exclude all of the designated Wildernesses in Arizona and New Mexico from the proposal.

Congress has designated all of the Wildernesses at risk under the 1964 Wilderness Act, 16 U.S.C. 1131-1136. The Wildernesses at risk include: the Gila and Blue Range Wildernesses in New Mexico, plus the following Wildernesses in Arizona: Superstition, Salt River Canyon, White Canyon, Needles Eye, Aravaipa Canyon, Galiuro, Santa Teresa, Fishhooks, Bear Wallow, Escudilla, Mount Baldy, Chiracahua, Arrastra Mountains, Tres Alamos, Rawhide Mountains, Harcuvar Mountains, Swansea, East Cactus Plain, Harquahala Mountains, Aubrey Peak, Upper Burro Creek, Hummingbird Springs, Organ Pipe Cactus, Coyote Mountains, Baboquivari Peak, and Pajarita Wildernesses. In addition to these 28 designated Wildernesses, this proposal also threatens the Blue Range Primitive Area as well as many Wilderness Study Areas (WSAs).

The DEIS would make changes to 10 Military Operation Areas (MOAs) to enhance its airspace training capabilities. Specifically, the DEIS proposes to lower the altitudes of existing MOAs to support low-altitude training (in some cases, as low as 500 feet above the ground, and in one just 100 feet above the ground), authorize supersonic training at lower altitudes in more MOAs, and authorize use of chaff and lower the minimum release altitude for flares. The DEIS also proposes to expand the size of the Tombstone

MOA.

Research documents the serious health effects of aircraft noise on humans and wildlife, such as auditory damage and startling response. And extreme sound disturbances can cause wildlife to abandon important habitat and impact their ability to successfully feed, mate, nest, and raise their young. For people who seek quiet and solitude in these Wildernesses, military training exercises are always at odds with experiencing such values of Wilderness and should be prohibited.

Flares comprised of aluminum and Teflon are released to mislead heat sensitive or seeking targeting systems. They allegedly burn out far above ground level, but there are documented cases of them being mistakenly released at low altitudes, reaching the ground, and igniting fires. Chaff bundles containing up to 5 million aluminum-coated silica fibers are used to obscure radar, and are designed to stay airborne as long as possible before they settle to the ground. Dumping flares and chaff above designated Wilderness is entirely inappropriate.

These Wildernesses in Arizona and New Mexico have been designated by Congress, and the preservation of their wilderness character, including such components as quiet and solitude, is a national priority established by Congress. The proposed actions in the Draft EIS will damage and degrade the Wildernesses over which your jets will fly.

Please choose either Alternative 1, (the No Action Alternative), or devise an alternative that excludes all of the designated Wildernesses from the proposed low-level flights.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Proescholdt".

Kevin Proescholdt
Conservation Director