

492 SOW Beddown EIS
13397 Lakefront Drive; Suite 100
Earth City, MO 63045

December 9, 2024

Attn: Mr. Nicolas Post, AFCEC/CIEE

To Whom It May Concern,

This letter provides substantive comments on the Draft Environmental Impact Statement for the 492nd Special Operations Wing (492 SOW) Beddown at Davis-Monthan Air Force Base.

By compounding, establishing, and consolidating circumstances indexed in these comments, the 492 SOW Beddown would sharply increase risks of adversarial strikes by transnational criminal organizations, domestic and foreign terrorists, and foreign national defense departments, to Davis-Monthan Air Force Base, the Tucson Metro Region, and communities in proximity to the Barry M. Goldwater Range, the Sells Military Operations Area and other regional MOAs.

The overall strategy of consolidating elite covert research and development activities, unique interagency defense collaborations, international arms clientele/forces hosting and major manufacturing facilities belonging to the third-highest funded U.S. arms contractor, juxtaposed with transnational criminal network adversaries, regional desired topography for training, and desired geographic boundaries for deployment, will constitute an extraordinarily vulnerable and attractive zone of infrastructure to be targeted by adversaries of the United States, and place the overlapped region of civilians and nationally/internationally recognized cultural/environmental assets, as well as troops in border-related deployments, at sharply increased risk.

This self-imposed strategic dilemma would be in direct conflict with stated Department of Defense goals to improve the continental U.S. employed-in-place infrastructure against heightened risks of surveillance, interference, and attack in an Era of Great Power Competition.

In proposing the 492 SOW Beddown at Davis-Monthan AFB, and throughout the attendant DEIS, the DAF fails to take a hard look at the impacts which would be risked by establishing a confluence of the following circumstances:

Installation of the 492 SOW, proximal to the U.S./Mexico border and border communities, and in juxtaposition to transnational criminal networks, would establish regional risks related to threatened and contested armed conflict between U.S. Special Operations forces and transnational criminal organizations based in Mexico, which are near-peer competitors to U.S. Special Operations forces –

- The incoming appointed U.S. Border Czar, Tom Homan, has made public announcements that the incoming U.S. Federal Administration will use United States Special Operations to eliminate transnational criminal organizations based in Mexico, although Mexico's president Claudia Sheinbaum rejects the plan.

- Mexican officials and video evidence verify that transnational criminal organizations such as Los Zetas, the Sinaloa Cartel, and Jalisco Cartel New Generation comprise a daunting asymmetric military force. Beyond possessing formidable arms and developed capability capacity, Jalisco Cartel New Generation, and possibly other cartels, are shown to have developed extensive tactical competence through the instruction of Mexican military defectors *who were trained expressly by U.S. Special Operations forces.*

Amid rising domestic and foreign fatigue/frustration with the evident direction of U.S. foreign policy, involvement in global conflicts, and presidential overreach in ordering military action overseas; in an already elevated terrorism threat environment, the 492 SOW Beddown would sharply elevate regional risk of strikes by offenders or adversaries which specifically target U.S. military involvement overseas, including risk to numerous additional military personnel who may deploy to the border region for enforcement of mass deportation –

- The 492 SOW is uniquely specialized in the testing, training, and deployment of personnel/ arms for elite warfare unofficially categorized as “Covert” or “Sneaky” - officially categorized as Unconventional, Asymmetrical, and Irregular - as well as for psychological operations, surveillance, and un-crewed aircraft operations.

- Noteworthy coupling of the 492 SOW Beddown at Davis-Monthan AFB with an Air Combat Command Intelligence Squadron would be adjacent to major munitions manufacturing facilities belonging to one of the world’s largest multinational intelligence services providers and aerospace/defense conglomerate manufacturers, which produces the LRSO nuclear cruise missile, and in 2024 was [fined](#) over \$950M in connection with defective pricing, foreign Bribery, and export control schemes (RTX Corporation, formerly Raytheon Technologies Corporation).

- In addition to associating installation of the 492 SOW with an Air Combat Command Intelligence Squadron adjacent to major RTX Corp munitions manufacturing facilities, Davis-Monthan AFB would become one of fewer than 5% of domestic U.S. DAF installations which are AFSOC Power Projection Wings for rapid global Special Operations deployment.

- The 492 SOW Beddown would increase regional DAF installations’ stature and attention in regards to the hosting and training of elite foreign national military members from countries doing arms business with the U.S. Department of Defense.

- U.S. Special Operations Forces (SOF) are now active in at least seventy countries, and their total budget increased fivefold during the two decades leading up to 2013. At that time, in the Preservation of the Force and Family program, Special Operations Command (SOCOM) acknowledged that growing DOD reliance on SOF had pushed some special forces and their families to the limits of their physical and mental well-being. DOD reliance on SOF has continued to grow in the past ten years.

- The U.S. Department of Homeland Security 2025 Homeland Threat Assessment for Public Safety and Security assesses the terrorism threat environment in the United States Homeland is and will remain high, [articulating](#), “We particularly are concerned about the likelihood of violence motivated by developing domestic and global events, including the 2024 election cycle and the ongoing Israel-HAMAS conflict.”

- Of analysis released October 2024, the bipartisan research organization CSIS [cites](#): “The number of domestic terrorist attacks and plots against government targets motivated by partisan political beliefs in the past five years is nearly triple the number of such incidents in the previous 25 years combined, according to analysis of 30 years of domestic terrorism data in the United States. Over the past four years, terrorist attacks and plots in the United States have primarily been directed at government, military, and law enforcement targets... there is a discernible increase in the number of attacks and plots against these targets beginning in the late 2000s that remains at elevated levels today”.
- According to a poll [released](#) August 2024 by Defense Priorities and YouGov, most Americans do not support unconditional aid to Ukraine. This poll reflects wider concerns that U.S. foreign policy may not align with public sentiment on international crises, including the conflicts in Ukraine and Israel, and tensions between China and Taiwan. More than 80% of Americans polled oppose committing U.S. troops to defend Saudi Arabia, indicating strong resistance to U.S. involvement in Middle Eastern conflicts that do not directly impact national security.
- In December 2024, the incoming president publicly warned “the Middle East” of his undefined retribution, if his stated demands are not met before he is sworn in as president, January 2024.
- In September 2024, a poll by the Institute of Global Affairs, through YouGov, [found](#) at least 75% of Americans agree that before ordering any military action overseas, the president should obtain the congressional approval required by the Constitution. This constitutional check has been increasingly bypassed in the past two decades, in tandem with the escalation of growing DOD reliance on SOF.
- Also in September 2024, a Cato Institute survey of 1,500 Americans, through YouGov, [found](#) exhaustion with the evident direction of U.S. foreign policy and U.S. involvement in global conflicts; and that majorities think it’s likely the U.S. is “closely” approaching World War III.
- The United States has armed Israel in its strikes on Lebanon and Gaza from at least early October 2023 to December 2024, despite multiple U.S. polls tracking disapproval by a majority of Americans, international resolutions stating disapproval by a majority of countries, and Israel’s failure to comply with October 2024 ultimatums set by Secretary Antony Blinken and Secretary of Defense Lloyd Austin, and despite the arms shipments violating multiple U.S. and international laws against aiding or abetting crimes against humanity, including the Rome Statute of the intergovernmental International Criminal Court, whose authority was recognized in November 2024 resolutions by prominent United States allies including Australia, Canada, and The United Kingdom, as well as in the legislation of at least 120 countries.
- In November 2024, the United States enabled targeting of supersonic tactical ballistic missiles provided to Ukraine, to strike inside undisputed Russian territory, despite June 2024 warnings by Russian President Vladimir Putin that nuclear-armed countries enabling strikes inside undisputed Russian territory would be considered direct involvement in war, and that Moscow could correspondingly provide long-range weapons to other countries to strike Western targets. New Russian doctrine was immediately established, which officially states an attack on Russia by any nation using conventional missiles supplied by a nuclear power will be

considered a joint attack, and revises Russian weapons deployment policy to lower the threshold for nuclear strikes.

The 492 SOW Beddown process is compounding impacts of rising civil unrest by increasing breaches of regional public trust related to regional Special Operations Forces activities –

- The U.S. Government Accountability Office has declassified multiple documents showing the DAF has been evaluating Davis-Monthan AFB and the surrounding region specifically for Special Operations expansion since at least 2005.
- A proposal for regional Special Use Airspace (SUA) Optimization was released 2022 *due to current regional airspace being insufficient to meet training deficiencies*. Although there was no subsequent change to regional airspace, proposal for the 492 SOW Beddown was released 2024, *stating that vast regional training space is advantageous to the transformation*.
- SUA Optimization would support the 492 SOW Beddown. Although the DAF has evaluated Davis-Monthan AFB and the surrounding region specifically for Special Operations expansion during two decades characterized by historic advances in research technology and arms technology, the DEIS for proposed SUA Optimization cites studies from 20-50 years in the past to assert impacts would be insignificant, with insufficient clarification on its association to the proposal for the 492 SOW Beddown.
- There is an extended-regional precedent of inadequate comprehensive assessment by AFSOC terminating a Low Altitude Training Area Environmental Analysis of New Mexico airspace in 2012, because a Finding of No Significant Impact could not be reached due to inadequate comprehensive assessment by the DAF.
- In 2024, the DAF intervened to withhold from public view comments by the U.S. Forest Service opposing the proposed regional SUA Optimization due to serious wildfire danger and other risks, although a formal Freedom of Information Request for these comments was filed. As has been extensively documented by public comments on the DEIS for the proposed SUA Optimization, the failure of transparent and democratic due process for these two proposals is unacceptable to many members of the public.
- Arizona Representative/Senator-elect Rubén Gallego has ignored multiple public requests for his opinion or clarification regarding apparent oversight in the early stages of interagency communication surrounding these proposals and failures throughout the processes for their release and review - despite his service as a Ranking Member of the Committee on Armed Services Subcommittee on Intelligence and Special Operations during release of the proposals for SUA Optimization and the 492nd SOW Beddown at Davis-Monthan AFB, as well as during the periods provided for their public review.
- Breaches of public trust related to regional Special Operations Forces activities include the extended-regional precedent of extraordinary contamination of Cannon AFB NM and surrounding communities with PFAs and other poisonous chemicals, and the 2022 chemical contamination of a nearby dairy farm so severe, it necessitated euthanizing all 3,665 or more cows, and handling of the carcasses as hazardous waste.
- The extended-regional precedent of extraordinary contamination by AFSOC is exacerbated by a July 2024 DAF press release announcing that internal DAF research shows at least 93% of

DAF installations, including Davis-Monthan AFB, have been contaminated with PFAs and other poisonous chemicals that are federally known to:

- impact bone microarchitecture;
- disrupt the biosynthesis and secretion of thyroid hormones;
- persist in the environment and accumulate in organs;
- accumulate in the organs of females up to three times more than in the organs of males;
- influence development in a sex-specific manner, affecting sex differences in emotional and cognitive behaviors;
- impact estrogen, androgen, or glucocorticoid activity;
- contaminate endocrine sex by interfering with hormone signaling and reproductive function;
- cause developmental and fertility problems, infertility, and hormone-sensitive cancers in both men and women; and
- negatively impact the reproductive health of future generations.

In addition to the necessity for the DAF to evaluate and present the impacts that would be risked by compounding, establishing, and consolidating circumstances indexed in these comments with adequate comprehensive assessment, standards of methodology, and public engagement, additional clarification regarding the 492nd SOW Beddown is needed for accurate public comment on the proposals for both SUA Optimization and the 492nd SOW Beddown –

- A year after the SUA Optimization proposal was released, DAF staff began asserting a need to move training out of the Barry M. Goldwater Range to make room for “more hazardous” training there. However, the 492nd SOW Beddown DEIS states its proposed action would reduce testing with live munitions such as rockets, missiles, and bombs in the BMG Range. This contradiction, together with the 492 SOW being specialized in un-crewed aircraft, suggests that DAF intent to move existing training from the BMG Range into civilian areas might be related to the possibility of testing and training next-generation AI-enabled un-crewed aircraft and other experimental weapons such as hypersonic drones for missile deployment, in the BMG Range.

- A potential exists for the 492 SOW to test/train elite, un-crewed aircraft and other experimental weapons in regional civilian airspace overlapped by MOAs. This possibility is elevated by the DAF intent to couple the 492 SOW with an Air Combat Command Intelligence Squadron at Davis-Monthan AFB - a unique and specialized coupling in the roster of domestic DAF installations. Use of AI-enabled arms in civilian airspace is a concern for many members of the public, as we are in the earliest stages of navigating ethics surrounding AI-enabled warfare.

- Although world leaders are urgently asking for international AI-arms talks to address problems such as computational bias and collateral casualties, U.S. Special Operations Forces are rapidly adapting experimental technology to military applications, and broadening the scope of their operations in more situations than ever before.

- For accurate public review and comment, immediate clarification is needed: Does the DAF intend for military aircraft to ever train with AI-enabled surveillance & targeting technology in

any of the MOAs proposed for SUA Optimization, and will AI-enabled un-crewed military aircraft ever be operated in any of the MOAs proposed for SUA Optimization?

Regional nationally/internationally recognized cultural/environmental assets of the overlapped region of civilians, and vulnerability –

- The Tucson metro area and other communities proximal to Davis-Monthan AFB/492 SOW Beddown operations areas are a combination of burgeoning urban density, and status as one of the only 34 remaining globally identified biodiversity hotspots (the only of the inland United States), designated by the global authority on the status of the natural world, the IUCN.
- The area is also one of the oldest cultural heritage sites in North America, based on archeological evidence of sophisticated agricultural practices dating at least as early as 1450 AD, as recognized by the United Nations and numerous other domestic and international organizations.
- Pima Association of Governments estimates the Tucson metro to be about 1,052,000 in 2024, growing at approximately 2% per year, and still expanding. Located 70 miles from the U.S./ Mexico border, being a hub for research in many fields of STEM, and having hosted the largest, oldest and most prestigious gem and mineral show in the world for over 50 years, Tucson sees an unusual amount of international travel for a city its size.

This combination of circumstances contributes to the area's assets and vulnerability, should it become an increasingly attractive zone to be targeted by adversaries of the United States.

The 492 SOW Beddown DEIS fails to provide comprehensive assessment of how the 492 SOW Beddown, by compounding, establishing, and consolidating circumstances indexed in these comments, would increase risks of adversarial strikes by transnational criminal organizations, domestic and foreign terrorists, and foreign national defense departments, against and/or affecting Davis-Monthan Air Force Base, the Tucson Metro Region, and communities in proximity to the Barry M. Goldwater Range, the Sells Military Operations Area and other regional MOAs.

We request that the DAF revise the 492 SOW Beddown DEIS to provide a comprehensive assessment of impacts substantiated in these public comments, make necessary clarifications for public review, disclose withheld interagency comments for any supporting proposal(s), conduct new in-person hearings in all affected MOAs, and provide additional periods for public comment.

In entirety, these comments are submitted by the following twenty-seven signatory organizations, businesses, and individuals:

Sincerely,

Peaceful Chiricahua Skies, Regional community coalition
www.peacefulchiricahuaskies.com

Kate Scott, Co-Founder, Madrean Archipelago Wildlife Center
www.MAWCenter.org

Patrice Mutchnick, Director, Heart of the Gila, NM
www.heartofthegila.org

Copper Canyon Trails, LLC
www.coppercanyontrails.org

Lorien Tersey, Owner, Dream Flower Garden Farm
lorien@dreamflowergarden.com

Jack and Felice Cohen-Joppa, Coordinators, The Nuclear Resister, Tucson AZ
www.nukeresister@igc.org

Ori Tsameret, Jewish Voice for Peace
ori.tsameret@gmail.com

Laurie Metroid, Jewish Voice for Peace
Lamidbar@gmail.com

Margaret Smith, Jewish Chaplaincy student
maggierawling@gmail.com

Crisosto Apache, Associate Professor
crisostoa@hotmail.com

Brian Smith, Journalist, Tucson Weekly
brianjabassmith@gmail.com

Emily Rockey, University of Arizona Graduate Student Researcher,
Environmental Science
520-328-6401

Joy Hought, Concerned citizen
2710 N Sparkman Blvd
Tucson AZ 85716

Duane Ediger, Concerned citizen, Tucson AZ
duaneediger@gmail.com

Sarah M. Roberts, Retired RN and concerned citizen
Sarah.Roberts.m@gmail.com

Hannah Levin, Concerned citizen, Tucson AZ
hannahlevin77@gmail.com

Jill Brammer, Concerned citizen, Tucson AZ
jillbrammer@gmail.com

Michael Newman, Graduate law student
thesunboat@arizona.edu

Joel Parris, Attorney
PO Box 29, Tucson AZ, 85702

Rachel Wilson, Concerned citizen
726 S 7th Ave
Tucson, AZ 85701

Donald Murray, Concerned citizen
726 S 7th Ave
Tucson, AZ 85701

Amelia Reeber, Concerned citizen, regional visitor
ameliareeber@gmail.com

Greta Anderson, Tucson community member
PO Box 1105
Tucson AZ 85702

Steev Hise, Concerned citizen
PO Box 1105
Tucson AZ 85702

Robert Hanson, Tucson community member
andy3hands@gmail.com

Nina Luxenberg, Concerned citizen
luxenberg.nina@gmail.com

Melinda Matson Spina, Tradesperson/community volunteer, Tucson AZ
matsonspina@gmail.com