

Subject: Airspace Study 24-A WP-91-NR, Arizona RSOP proposal

Manager, Operations Support Group, AJV-C2
Attn: Jesse Acevedo; Airspace Study: 24-A WP-91-NR
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Federal Aviation Administration
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Operations Support Group, AJV-C2,
Please note, my comments to the FAA include the two PDF files attached to this email:

- a copy of the text of this email
- a copy of my November 11, 2024 comments to the USAF

Thank you for accepting public comments regarding this proposal. Moreover, thank you for your civil service in the extraordinarily consequential realm of aerospace systems, on behalf of the US Department of Transportation.

I have utmost respect for civil servants who choose the pinnacle of safety and efficiency across US aerospace systems as their career's North Star - particularly because my father gave 50 years of his life to the DoD, including over a decade in civil service to the USAF as one of the nation's leading Space Launch Squadron Chief Engineers. I have immediate family members who are top engineers for major defense contractors in partnership with the Air Force, and other relatives who are veterans of the Air Force. In many ways, my family is defined by military and civil services within the engineering and administration of aerospace systems - and by utmost integrity related to such service.

After my three years of research and civic engagement on the proposed SUA Optimization of Arizona and New Mexico, it is impossible to dispute that this proposal is in radical conflict with your mission to provide safe and efficient aerospace systems within the US. Any amount of serious analysis will inundate your team with evidence of that fact, beginning with the previously censored comments regarding fire ignitions, submitted by the US Forestry Service.

It cannot be said enough that most of the studies used by the Air Force to dismiss risks posed by this proposal were conducted 30 to 50 years ago, long before health effects, from hearing damage to antibody responses, were well researched for exposures, from plume chemistry to the way noise travels under various atmospheric conditions. The dearth of modern citations is shocking, considering we are perhaps 5 years away from AI-powered human-machine aircraft collaboration such as autonomous jets in dogfighting; and the capacity of AI-assisted socio-environmental research available right now. In addition to risks and impacts detailed in my attached comments, this email serves as my personal endorsement of all relevant comments officially submitted to both the USAF and the FAA by the Tohono O'odham Nation and the Peaceful Chiricahua Skies Coalition.

As your bureau is surely aware, there is also a new complicating factor: last month, protecting of birds of prey from interactions with wind turbines was cited by the administration of US President Donald Trump as a focal purpose in the canceling of nearly \$700M federal funding for more than a dozen wind power projects by the Department of Transportation; and for the halting construction of a \$4B wind power project by the Department of the Interior.

Considering this specific precedent of federal activism (relative repercussions for rural children notwithstanding), it is clearly impermissible for the USAF to cause sonic booms below five thousand feet and conduct air combat training at one hundred feet in the US region with the highest combined density and diversity of nesting birds of prey; in tandem with the region's extensive protective classifications by the United States Army Fort Huachuca Sentinel Landscape Program, US Important Bird Areas Program, US Fish and Wildlife Endangered Species Initiative, North American Bird Conservation Initiative, Convention on Migratory Species of the United Nations Environment Program, and the Critical Ecosystem Partnership Fund. There is simply no other migratory flyway in the continental United States equal to that of the Tombstone MOA, as can be confirmed by the Department of Defense Partners in Flight Program.

When, in 2022, I wrote to the 355 WG/PA 355th WG Public Affairs office with substantive questions regarding my firsthand account of a warplane flying in negligent proximity to the iconic geologic hoodoos of Portal Peak and buzzing an audible nest of brooding raptors presumed to be eagles; my complaint was dismissed, my questions were left unanswered, and the PA office replied only that military pilots "do not violate restrictions", and "military leaders know what they're doing". Should more permissive rules be authorized, there is no expectation they will not be surpassed.

In fact, the USAF has repeatedly broken the trust of civil society during the undemocratic process of this proposal; including an egregious failure of good faith surrounding overt and induced socio-economic, health, and safety impacts to affected regional Native Nations. In terms of social redress, there are no impacts the Air Force could impose on regional Native communities that would not compound the impacts of militarization and military-adjacent exploitation these sovereign Nations have been, and continue to be, subjected to.

I expect that the minds of most sound judgment at the FAA will prevail, in agreement with the thousands of comments by both government officials and the general public to date. Let the peoples' trust not be further broken. In conclusion, I repeat: it is impossible to dispute that this proposal is in radical conflict with your mission to provide safe and efficient aerospace systems within the United States of America.

Sincerely,

Melinda Matson Spina