



Veterans For Peace

Donald and Sally-Alice Thompson Chapter #63
Albuquerque, New Mexico

John E. Wilks, III
President
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September 4, 2025 Via Email: 9-natl-csa-public-noticeairspace@faa.gov

Federal Aviation Administration (FAA)

Re: Airspace Study 24-AWP91-NR, Arizona RSOP Proposal

Ladies and Gentlemen:

In accordance with the FAA notice, Chapter #63 (Albuquerque) Veterans For Peace timely files this public comment in opposition to the proposed Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona and New Mexico.

Our comments in opposition to this proposal are focused on aviation and airspace safety concerns.

The Federal Aviation Administration (FAA) must deny this proposal because granting the request would run counter to the core mission of the FAA. Allowing the US Air Force to maraud in the skies above the southwest portions of Arizona and New Mexico would threaten public safety regarding potential hazardous risk of fires in the lands below the flights; pollution to air, soil, and water; and ambient noise.

The mission of the FAA is as follows:

“...to provide the safest, most efficient, and most environmentally responsible aerospace systems in the world. This involves regulating civil aviation,

operating the National Airspace System's air traffic control and navigation, advancing aviation technology, and regulating commercial space transportation to ensure the safety of the public and the advancement of civil aeronautics."

There is nothing in the FAA's mission statement that mandates facilitating military ultra-hazardous training flights through civil aviation airspace. In the Air Force's proposal, scheduled commercial air traffic could operate above the tactical maneuver spaces proposed for military training, but unscheduled, incidental, and recreational flights are highly likely to be compromised.

We strongly oppose any accommodation to the military for the reasons which follow:

FLIGHT RISKS The lands encompassed by the military operations areas (MOAs) in the proposal are agricultural, recreational, and public wilderness or otherwise sensitive habitats. The proposal would affect dozens of rural communities, as well as 30 tribes and pueblos and millions of acres of public lands. Crop dusters, drone reconnaissance flights by the federal land management agencies, suppression of wildfires by drones, slurry bombers, and smoker jumpers (parachutists), hand gliders, medivac helicopters, and hunting parties using small fixed-wing aircraft frequent the area. They operate without predictable patterns or notices of operation. High speed, tactical military aircraft and those civilian aviation operations should never occupy the same airspace. The Special Use Airspace (SUA) proposed by the military is impractical and reckless. It should not be entertained.

The USAF proposes to operate day and night certain high-performance aircraft (F-16, F-35, A-10) at ultra-low altitudes and high speeds, while performing aerial maneuvers and dropping incendiary magnesium flares, plus toxic chaff. Further, it is also reasonable to assume aerial refuel aircraft or other support aircraft might also use the modified airspace. We understand that both active-duty Air Force and Air National Guard crews will operate aircraft from three bases in Arizona in the proposed modified airspace. If aero-tanker, airborne command aircraft, and post-crash crew evacuation aircraft are needed, we assume that those aircraft will originate from bases in New Mexico and elsewhere. They would operate in unfamiliar areas, possibly during heavy congestion.

We are highly skeptical of the proposal to continue joint-use airspace under any scenario, either visual or instrument flights rules. There are at least 20 private airports within the proposed expansion area. We understand that both regional and national pilot associations have called out this proposal for being

overly expansive and a risk to civil aviation. For the Department of Defense and the Department of Transportation to ignore these concerns is inappropriate.

DANGERS TO THE COMMUNITY (Both Natural and Man-Made Resources)

Dropping flares containing magnesium is a fire risk. More than 85% of all fire suppression efforts in New Mexico are performed by voluntary fire departments. Volunteer fire departments are not allowed in national forests, national monuments, national wilderness areas, or state preserves without the express authorization of the US Forest Service (USFS), the Bureau of Land Management (BLM), or the National Park Service (NPS). The response times for wildfire suppression would be uncertain and lengthy because the Air Force has not stated its intention to devote fire suppression resources in the event of an aircraft crash or a fire due to a flare. The areas affected by the USAF's proposal are as follows: Gila NF, Coronado NF, Apache NF, BLM lands in the Southwest New Mexico's Bootheel Region, including Wilderness Study Areas and Areas of Critical Environmental Concern. Further training areas affect the Aldo Leopold Wilderness, the Chiricahua Wilderness National Monument, the Gila Wilderness, the Blue Range Wilderness and primitive areas, and the Chiricahua Wilderness.

The proposal contains four possible plans, with the Air Force favoring an option that includes the Morenci and Reserve MOAs. Those two areas include airspace over Grant and Catron Counties in New Mexico, including about 42 percent of the Gila Wilderness. In those two areas, the proposal would lower the altitude at which supersonic flights can occur from 30,000 feet above sea level (AGL) to 5,000 AGL, and increase the number of sorties, or training flights, from 3,350 to 4,050 per year.

The Tombstone MOA, which includes New Mexico's bootheel and south-east Arizona, would see the greatest amount of change. If approved, that area would expand north by 10 nautical miles. Jets could fly as low as 100 feet above ground and use chaff, which consists of tiny, aluminum-coated, glass fibers.

The Department of Defense does not make frequent or comprehensive reports, available to the public, of its emissions, pollution, or contamination incidents.

Dispersing flares that contain iron oxide and PFAS (Teflon), plus chaff, which contains aluminum and silicon fibers, is hazardous to wildlife and domesticated livestock grazing under permits issued by the various federal land management agencies.

The discharge of jet fuel distillate and engine exhaust particulate would cause contamination of the air, water, plants, and wildlife. We are mindful that the U.S. military is globally the largest institutional source of greenhouse gases. Although the 1997 Kyoto Protocols, bowing to U.S. military pressure, stipulated that most military emissions would not count toward any country's national totals, we urge the FAA to consider the adverse environmental impacts that the USAF's proposal would cause.

We are mindful that the FAA's mission statement contains a duty that the Administration ensure the most environmentally responsible aerospace.

ADVERSE IMPACT ON AMBIENT NOISE

Creating sonic booms is disruptive to both wildlife and livestock. Visitors and residents in the affected land would also be at risk of accidents from startled horses and pack mules caused by both sonic booms and engine noise.

The loss of tranquility in the area may discourage recreational visitors. We further note that the USAF's proposal will result in no economic advantage to the residents of the area.

Diminishment of property values, due to undesirability of noise from sonic booms and loud engine noise while performing aerobatic maneuvers, is unacceptable to property owners and businesses.

NO NECESSITY FOR THIS PROPOSAL

Alternative training areas exist. The USAF could achieve its objectives by using the Nevada Test and Training Range (NTTR), the Barry Goldwater Range, the McGregor Range on Ft. Bliss, the White Sands Missile Range and Proving Ground, and Nellis AFB. Although we acknowledge that shared use of these alternative sites would necessitate close coordination by the host installations, the USAF, and possibly the FAA, it seems prudent to use these sites rather than to subject the resident public, the traveling public, and the FAA to implementation of regional airspace modifications. We believe that if the Air Force were more attuned to sharing available DOD assets at Edwards AFB, NAS Fallon, Ft. Bliss, Ft. Hood, Ft. Sill or the US Army's National Desert Training Center at Ft. Irwin, this proposal would be moot.

FEDERAL LAW NON-COMPLIANCE

We do not believe that the USAF has adequately followed the protocol of the National Environmental Policy Act with this Draft Environmental Impact Statement. Not all the reasonable alternatives to the proposal were analyzed and considered. Additionally, some of the requests in the proposal appear to hinge on various federal agencies granting waivers or exemptions from long standing policy, rules, or statutes. For example, fireworks and pyrotechnics are not allowed in national parks or on many federal lands. Additionally, it appears that provisions of the Air Force's proposal would transgress provisions of the Wilderness Act of 1964 and the Endangered Species Act of 1964.

Respectfully submitted,

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