

Manager, Operations Support Group, AJV,C2
Attn.: Jesse Acevedo; Airspace Study: 24-AWP-91-NR
Federal Aviation Administration
10101 Hillwood Parkway
Fort Worth, TX 76177

(sent by email to 9-natl-csa-public-noitce-airspace@faa.gov)

Dear Mr. Acevedo,

I live within the Tombstone MOA. Our region is currently experiencing a prolonged drought, along with frequent periods of strong, unpredictable winds. At the same time, federal fire prevention programs have been reduced.* These conditions create an environment where the increased number of military flights—and the increasingly risky behaviors associated with them—pose a serious danger. The likelihood of a wildfire being ignited by an aircraft crash or by the malfunction or misuse of flares is high.

Wildfire response in the Tombstone MOA is difficult under the best of circumstances and nearly impossible when strong winds are present. The Horseshoe II Fire** (In the Tombstone MOA), which began during high winds, burned for 48 days and serves as a stark reminder of what is at stake.

While the Air Force maintains flight rules designed to mitigate risk, my experience as a resident has been very different from the “best case” scenario presented. Pilots often fly lower than permitted, pass directly over homes, and make risky maneuvers in the canyons. These violations of flight rules underscore that the risk is greater than officially acknowledged.

When the potential for an unintended fire is combined with the extreme difficulty of containing one once it starts, it is unreasonable to expand flight activity in this area. The Tombstone MOA is home not only to people, but also to unique ecosystems and wildlife. Damage from fire in these environments cannot be undone.

I respectfully urge you to weigh these risks with the seriousness they deserve and to reconsider any increase in flight activity over this region.

Brad Emerson
Portal, AZ

*In February 2025, the Trump administration halted funding for wildfire prevention programs in western states. This funding freeze included hazardous fuel treatments and seasonal firefighter hiring, paramount to reducing wildfire risk.
westernforesters.org

**The Horseshoe II Fire started on May 8, 2011, in the Chiricahua Mountains of southeastern Arizona. It was 100% contained on June 25, 2011.
That’s about seven weeks (48 days) of active burning.
In total, it burned 222,954 acres, making it one of the largest fires in Arizona history.