

September 17, 2025

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

Email Submission to: 9-natl-csa-public-notice-airspace@faa.gov

I am writing to express opposition to the Department of the Air Force proposal to Amend Special Use Airspace Military Operations areas around Arizona and New Mexico with locations detailed in the Summary for Case No 24-AWP-91-NR

I live outside the current Tombstone MOA, yet for years Air Force jets periodically fly well below 500 feet, at times to 100' levels, directly over my home in violation of current FAA rules even if within the current Tombstone MOA boundary... At my residence they are not. These flights have also been observed & heard outside Tombstone MOAs by many other residents as we hike, bike, and visit neighbors in the nearby National Forest. The jets scream their presence & sometimes cause vibrational impacts as they chase one another between narrow canyon walls.

Illustrations of non-adherence to current AF boundaries and Air to Ground Level (AGL) requirements have prompted ongoing community skepticism about Air Force training & safety requirements, compliance, and accountability. Too often AF pilots have seemed unconcerned, uninformed, or dismissive about Federal Aviation Regulation 91.119

Those incidents serve as red flags about AF amendment expansion requests in any form including case 24-AWP-91-NP. That proposal magnifies residents' legitimate concerns about:

-hearing loss, tinnitus, anxiety symptoms and other health risks (including injurious falls) from louder jet noise exposures related to lower AGLs & increased flight frequency

-negative economic impacts on civilians' homes (structural damage), lower resale values, business losses, cattle & other animal distress & endangerment from lower flying jets & supersonic operations.

-Tombstone MOA expansion resulting in destruction to highly valuable historical areas of preservation including the American Museum of Natural History SW Research Station, the Coronado National Forest, Chiricahua Wilderness Area, the Chiricahua National Monument and more

-pilot training error resulting in collision fatality & major fire

-break down of AF jet communications with Medical Evacuation helicopters or local small plane flights resulting in collision accident

-release of flares during increasing drought conditions igniting potentially massive fire

-jet flight training encounters with large birds or bird flocks during migrations that could result in significant accident

-pets (dogs, cats, horses, cows) lost/injured/deceased from bolting triggered by fear response to loud noise

Prior to retirement I worked for 8 years as a Nurse Practitioner conducting Department of Defense Post Deployment Health Reassessments required by all military branches. The #1 and #2 service related injuries are Tinnitus (ringing ears) and Hearing Loss, both commonly caused by loud noise exposures.

Auditory system damages from noise are permanent and tragic, it's why the VA employs the largest number of audiologists & specialists in hearing & balance in the U.S. Recent estimates of costs related to Veteran hearing loss injuries including rehabilitation expenses & disability payments exceed **\$4 billion** annually. (HearingHealthMatters.org, 9/8/25). At last count in 2020, 2.3 million veterans with tinnitus and 1.3 million with

hearing loss were receiving disability compensation
(www.research.va.gov)

Military provision of effective hearing protection devices has been elusive. This year 3M is to initiate distribution of **\$6 billion** compensation payments for an earplug protection settlement related to hearing loss & tinnitus suffered by 250,000 military service members who used the 3M devices, the fortunate “few” alerted in time to join the class action law suit
(HearingHealthmatters.org)

The US Senate recently advanced the 2026 Defense Appropriations bill to include \$7.5 million funding for the Aware Custom Biometric Wearable device designed to enhance hearing protection for military personnel. The “Aware” has yet to begin field testing of technology “based on 3D digital scans of the (individual’s) ear canal, enabling delivery of custom in-ear devices designed to protect soldiers operating in high-noise environments.” HearingHealthMatters.org, Sept 8, 2025

Hearing Loss and Tinnitus injuries are why the Department of Defense Hearing Center for Excellence was started years ago, a major part of its focus is on “prevention and mitigation,” with ongoing efforts to support & advocate for better hearing protective devices (www.health.mil). That website recently reported on a new 3M Hearing Protection Fit Testing plan (HPFT) for military members, which includes a personal attenuation rating (PAR) to adjust their device fittings on an individual basis.

It remains to be seen whether HPFT/PAR or “Aware” will help mitigate hearing loss & tinnitus damages for service members, the www.health.mil website has various numbered Quick Facts to educate service members about the importance of noise damage protection:

#4 Unprotected repeated exposure to loud sounds over a period of time can cause permanent inner ear damage

#5 Noise induced hearing loss can develop gradually over time with multiple exposure to loud noises or be the result of a one-time exposure to high intensity noise

#17 any exposure to 140dB sound can cause immediate damage and actual pain

Air Force jets, if flying at low levels routinely produce 140dB, even louder sound if flying close to mountains or in narrow canyons. The point of all the above information is that military branches have struggled unsuccessfully & continue to do so to provide fully adequate hearing protection for predictable duty related loud noise volumes experienced by pilots in the air and service members on the ground.

The data cannot be disputed that training flights in AZ & NM MOAs put unprotected ears of local civilians at risk of harm. **Proposing to increase flight numbers and lower AGLs guarantees additional adverse impacts for high numbers of residents (to their properties and livelihoods), is risky also for researcher residents, venue guests, day & weekend visitors, regular commuting workers, and those who frequent our National Forest (hunters, campers, naturalist enthusiasts, hikers, bikers etc). Most of these individuals have zero protection. It is impossible to block extremely loud fighter jet noise abruptly & unpredictably occurring throughout the day while at the same time living regular lives that require ongoing communication capability.

As documented above, hearing protection for those who serve our country has been woefully inadequate for damage prevention. It seems obvious that residents in Arizona & New Mexico AF MOA jet training areas without hearing protection are at high risk of sustaining auditory & vestibular injuries, frequent falls from startling reactions, plus related adverse mental health and economic impacts.

I request that the FAA moves to deny Special Use Airspace Military Operations Special Use Airspace expansion in the immeasurably valuable Tombstone MOA area and suggest that trainings be established in safer locations with lower population density.

Thank you for consideration of the above input,

Deborah Herczog, RN, MSN, NP
2525 S H Bar M Rd
Portal, AZ 85632
debherczog@gmail.com