

August 19, 2025

TO: Federal Aviation Administration
RE: Request for Public Comments on USAF DEIS Expansion proposal
Manager, FAA Operations Support Group AJV-C2
Attn: Jesse Acevedo: Airspace Study: 24-AWP-91-NR
Federal Aviation Administration
1010 Hillwood Parkway
Fort worth, TX 76177

(Submitted via email)

FROM: Kim Vacariu

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To Whom It May Concern:

The Draft Environmental Impact Statement for Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona has failed the people who will be negatively affected by this proposal through it's missing and incorrect data as pointed out in many thousands of previous public comments (6,695) received by the Air Force (6,695).

Therefore, I ask the FAA to oppose this DEIS until the supplemental appendices needed to address the critical omissions relating to public safety and federal lands protection and other incorrect data are added as supplements or the entire DEIS is re-written to include the missing critical information.

Of greatest concern are the well-established threats to public safety that implementation of this DEIS would present, including forest fires caused by low-elevation dropping of flares over drought-impacted areas, public health impacts due to extreme noise and accident dangers, economic impacts that such noise will cause to businesses, and other effects detrimental to the safety of public lands, private ranch livestock, and sensitive wildlife in established protected areas.

FAA has a major responsibility to follow up on its concerns about public safety. Of major importance is the need for an updated noise analysis of the proposal. A lower, more realistic noise threshold is needed to reflect accuracy.

Another major concern is for the safety of private pilots using small, local airstrips within the MOAs. Under the proposed conditions of lowered supersonic flights and activity, the entire MOA airspace is technically unusable for visual flight operations. Private pilots will be affected at all times by regulatory confusion and dangerous USAF operations proposed in the DEIS.

There was no Notice of the FAA's new Request for Comments published in the Federal Register. Since the FAA is obviously a cooperating agency in this proposal, there should have been public notice per NEPA requirements. Why was this not done?

FAA can establish Avoidance Areas for specific areas already under protection for birds, wildlife, etc. The Federal Transportation Act controls noise over parks and protected areas, giving the FAA well-established means for creating such Avoidance Areas.

Since the existing DEIS contains incorrect data and fails to include critical other information regarding public safety, the FAA must avoid approving the DEIS as is to avoid the perception that the FAA is being Arbitrary and Capricious in its reliance on incorrect data in the DEIS to make its decision.

The Air Force must not shift the unacceptable burden of risk in moving hundreds of dangerous combat training flights from the huge, completely unpopulated, federally-controlled airspace at BMGR to the smaller, heavily-populated Tombstone MOA which contains highly sensitive economic and biological components. This is totally inadequate risk and safety analysis.

The DEIS claims that its increased combat training missions will cause “no significant impact” to communities in the Tombstone MOA. The DEIS’s lack of accurate transparency in addressing the impacts of noise levels alone is particularly obvious. The DEIS claims that there will be no increase in noise levels and no impact on tourism, property values, or wildlife. The amount of information available to the contrary of this statement is overwhelming. You don’t have to be a scientist to know that when one doubles the number of combat training missions from 3,500 to 8,000 flights annually, including much noisier F-35s — and at the same time dramatically lowers the elevation and increases the speed of those flights, that you would certainly be increasing noise levels. This blatant avoidance of accuracy is suspect to the point that it brings into question the qualifications of the technicians who wrote the DEIS. Either these statements are grossly unresearched or the USAF is overtly hiding the true impacts of the expansion from the public. That’s a clear violation of NEPA.

ACTIONS NEEDED:

1. Up-to-date data on noise impacts must be immediately provided in an appendices supplement to the DEIS.
2. More relevant and accurate data on the effects of this proposal on public safety and federal lands must be analyzed and published as an appendix supplement to the DEIS.
3. Relevant and updated data on the biological effects of Chaff, and relevant data on the threat, and actual occurrence, of ground fires caused by malfunctioning Magnesium Flares must be analyzed, and these changes must be published as an appendix supplement to the DEIS.
4. Expanding military combat training over rural communities and tribal and public lands is not acceptable. The Air Force should restrict its lower elevation and supersonic flights, and other combat training, such as dropping chaff and flares, to the Barry M Goldwater Range where it’s already safely happening. The Air Force must not shift the burden of risk to rural and tribal communities in southern AZ and NM.

Thank you for this opportunity to comment,

Kim Vacariu
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