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September 24, 2024

Arizona Regional Airspace EIS  
c/o Stantec  
501 Butler Farm Rd., Suite H  
Hampton, VA 23666

**Re: Draft Environmental Impact Statement (DEIS) – Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona**

The Arizona Pilots Association (APA), representing the Arizona general aviation community, submits the following comments in response to the Draft Environmental Impact Statement (DEIS) related to proposed modification of Special Use Airspace (SUA) in Arizona. After careful review of the DEIS, APA believes that the proposed expansion of Arizona SUA would have a negative impact on general aviation in terms of both safety and accessibility.

A summary of our concerns related to the changes proposed in Alternative 2 of the DEIS is provided below:

- **Impacts to VFR Operations** – As part of the DEIS, the Air Force is proposing to lower the floors of the Outlaw, Jackal, Gladden and Bagdad MOAs to 500 feet AGL and the expanded Tombstone MOA to 100 feet AGL. In addition, the DEIS proposes authorization of supersonic flight down to 5,000 feet AGL in the Tombstone, Outlaw, Jackal, Morenci, and Reserve MOAs.

APA is extremely concerned about the impacts to flight safety if general aviation VFR traffic is forced to “see-and-avoid” military traffic maneuvering at high subsonic or supersonic speeds. From a risk management perspective, this results in a much higher statistical probability of a mid-air collision with obvious catastrophic results. This is particularly true in areas such as the Outlaw, Bagdad and Gladden MOAs which have a high volume of VFR flight training traffic.

We believe the DEIS understates this risk based on the following:

- The DEIS assumes that VFR traffic will avoid active MOAs. We believe this is an incorrect assumption based on the large areas covered by SUA in the Southwest and the difficulty of developing alternate flight planning with sufficient terrain avoidance, fuel and divert options. Therefore, general aviation pilots are often forced to transit active MOAs to safely complete their flight.
- The current 2 hour requirement for issuing MOA NOTAMs does not allow for effective flight planning as a general aviation pilot could depart and find that the MOA they are transiting has become active.



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- Mountainous terrain and low in-route altitudes for VFR traffic make radar and communications coverage unavailable and limit the use of ATC services such as Flight Following. In addition, we contend that the number of general aviation aircraft operations noted in the DEIS are understated based on terrain masking and radar coverage limitations.
- Most military aircraft operating in the MOAs are not ADS-B equipped (fighter aircraft in particular) eliminating the ability of general aviation pilots to use ADS-B to avoid conflicts.
- **Impacts to Instrument Flight Rule (IFR) Operations** – As stated in the DEIS, IFR traffic will be required to fly around an active MOA. With the proposed expansion of the MOA operating hours and number of operations, we feel this places an undue burden on aircraft on IFR flight plans in that rerouting requires additional flight time and an additional fuel stop may become necessary.

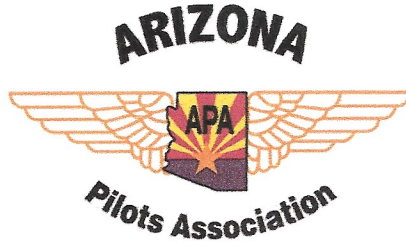
The DEIS also indicates that instrument approaches to Cochise County (P33) in the expanded Tombstone MOA, and Phoenix-Mesa Gateway (KIWA) and Coolidge (P08) airports in the Outlaw MOA would require alternate missed approach or initial fix instructions when the MOAs are active. Again, the current 2 hour requirement for issuing MOA NOTAMs does not allow for effective flight planning as a pilot could depart and find his airway, route, or approach unavailable due to an MOA going active.

- **Impact on Public and Private Airport Operations and Access** – The expansion of the Tombstone MOA and the lowering of floors for the Tombstone, Outlaw, Jackal, Bagdad and Gladden MOAs would impact both operations and access to public/private airports and airparks located within the boundaries of the MOAs. Aircraft using these airports would be forced to transit the MOAs while they are active since attempting to fly below the floor of the MOA at < 100 or 500 ft AGL would be unsafe.

APA understands and supports the Air Force's need to train to have the capability and readiness to support our national defense. However, we believe the changes proposed to the SUA airspace in Arizona and New Mexico would adversely impact general aviation. We believe measures should be taken by the Air Force and FAA to adequately accommodate general aviation and preserve airspace accessibility in the region. Consequently, APA has several recommendations that we believe could improve safety and accessibility:

- Conduct further analysis of the effect of expanding the Tombstone MOA and lowering the floor of the Tombstone, Outlaw, Jackal, Bagdad and Gladden MOAs to flight safety directly related to VFR aircraft operating "see-and-avoid" in the same airspace as maneuvering subsonic/supersonic military aircraft.
- Increasing the required notice for MOA NOTAMs to 4 hours in advance versus the 2 hours currently required.

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- Investigate the development of a Letter of Agreement (LOA) between the Phoenix and Albuquerque ARTCC's as a method for mitigating the negative impacts on IFR traffic. This would provide a process for recalling military aircraft out of portions of the MOA and allow IFR traffic to safely transit the MOA's when they are active.

Thank you for the opportunity to comment on this important issue. If you have any questions, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Nugent', with a long horizontal flourish extending to the right.

Chris Nugent

President – Arizona Pilots Association

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