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Docket Operations, M-30
Department of Transportation
1200 New Jersey Avenue SE
Room W12-140, West Building Ground Floor
Washington, DC 20590-0001

February 1, 2026

Subj: [Docket No. FAA-2025-5571; Airspace Docket No. 25-AWP-172] RIN 2120-AA6 Amendment of Class D and Establishment of Class E Airspace; Chandler and Phoenix, AZ

The Arizona Pilots Association (APA), representing the Arizona general aviation community, submits the following comments in response to the subject Notice of Proposed Rulemaking (NPRM) the proposed changes to the Chandler Municipal Airport (KCHD) and Phoenix-Mesa Gateway Airport (KIWA) Class D airspaces. After careful review of the NPRM, APA is strongly opposed to these changes based on significant safety risks created by the proposed expansion of the vertical and lateral dimensions of the KCHD and KIWA Class D airspace.

A summary of our specific comments is provided below:

- The proposed changes are focused on IFR procedures. However, the traffic in the vicinity of KCHD and KIWA is largely comprised of VFR traffic including aircraft originating from Mesa Falcon Field (KFFZ). KFFZ ranked as the third busiest airport in the state of Arizona in 2025 with over 475,000 operations. Most of these operations are VFR training flights.
- The proposed increase in the ceiling of the KCHD Class D airspace to 3,700' MSL will leave only a 300' gap between the Phoenix Class B airspace at 4,000' MSL. There is significant volume of VFR traffic that utilizes the corridor from KFFZ to KCHD for transition around the Phoenix Class B and to access the south practice areas. This eliminates an established VFR Flyway and increases the probability of conflicts and midair collisions.
- The proposed increase in the lateral dimensions of the KCHD airspace would eliminate the ability to conduct left traffic and impede some instrument approaches at Stellar Airpark (P19). This change will also force aircraft departing P19, including jet traffic, to depart to the south into the already congested south practice area.

In addition, this lateral increase would close the distance between the KCHD Class D airspace and the Phoenix Class B (9,000' – Surface) airspace. This would further constrain and concentrate VFR traffic in this area.

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- The proposed increase in the lateral dimensions of the KIWA Class D airspace will merge the KFFZ and KIWA airspace eliminating another corridor for VFR traffic. This will require both pilots and controllers at three airports (KFFZ, KIWA and KCHD) to manage a high volume of transitions, increasing overall workload, pilot deviations and the potential for conflicts and midair collisions.
- The proposed 1.2 nm exclusion area for Pegasus Airpark (5AZ3) is inadequate based on increased turbine/jet traffic at Pegasus, aircraft maneuvering limitations and terrain constraints.
- As noted in the Aviation Safety Advisory Group (ASAG) comments, there was no coordination with key airspace stakeholders including:
 - Phoenix Approach (P50)
 - KFFZ, KCHD and KIWA Air Traffic Managers
 - Pegasus and Stellar Airpark Airport Managers
- From an editorial perspective, this NPRM would benefit from the inclusion of a graphical depiction of the proposed airspace changes to allow reviewers to better understand the scope of the overall proposal.

Overall, this proposal would drive increased pilot and controller workload, increase pilot deviations and introduce unacceptable safety risks.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Nugent', written in a cursive style.

Chris Nugent - President
Arizona Pilots Association
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