



New Mexico Pilots Association

February 17, 2022

To: Department of the Air Force  
355<sup>th</sup> Civil Engineer Squadron (ACC)  
Davis-Monthan Air Force Base, Arizona  
Cc: Pedro Rael, New Mexico Aviation Director  
Michiko Martin, Regional Forester; US Forest Service, Region 3  
US Senator Martin Heinrich

From: The New Mexico Pilots Association

**RE: EIS for Special Use Airspace Optimization to Support Air Force Missions in Arizona**

These comments are made on behalf of the New Mexico Pilots Association (NMPA), representing over 5,000 licensed pilots statewide. Our members fly frequently within the MOAs under discussion, including flights to and from the numerous dirt strips across Southwestern New Mexico. Our members (many ex-military) fly for personal transportation, recreation, and business.

We support efforts to attract and retain military training for New Mexico, recognizing the economic impact to our state and the importance of military training to protect the freedoms we enjoy. We appreciate the opportunity to provide our concerns about how major elements in the proposed Alternatives would negatively impact aviation access to New Mexico. As currently proposed:

- We strongly support **Alternative 1 (No Action)**
- We oppose **Alternatives 2 and 3**, as they would allow supersonic flight as low as 5000' AGL, excessively expand MOA volume by lowering current floors (Jackal, Outlaw, Tombstone, Bagdad and Gladden) to ground level (100' or 500' AGL) and combine low airspace with higher altitudes which would unnecessarily increase Active time.
- **Alternative 4** is slightly more palatable by allowing supersonic flight at higher altitudes, but these would still impact current land and aviation use. In addition, the expansion of airspace to ground level, all daylight weekday hours, and combining tiers proposed in Alternatives 2 and 3 remain.

At this stage, we lack information that would justify such expansive increases of low airspace, consolidating low and high tiers, and for lowering authorizations for supersonic flight and chaff/flare. As the Draft EIS is prepared, we expect to see:

- A detailed analysis of planned usage of the airspace, specifically defined for segments typically used by general aviation, from 100' AGL to 13000' MSL (or at least from 100' AGL to 10000' MSL).
- Provide explanation of the frequency and reasons that supersonic flight is needed to such low levels and show how currently authorized airspace is inadequate (i.e., Bagdad, Gladden and Barry Goldwater Range).
- Specific details for expectations of usage for the Reserve and Morenci MOAs as they are the farthest distance and thus likely less utilized than closer MOAs.



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- Describe the expansion of airspace in terms of percentage of volume increases, rather than number of MOAs.
- How the USAF is minimizing impact on civil aviation

With a spirit of cooperation, we recommend a new Alternative be developed that:

- Limits low level supersonic authorization to Bagdad and Gladden MOAs
- Maintains free and open access for general aviation transit across these areas of Arizona and New Mexico
- Maintains or establishes separate Low and High tiers, allowing low tiers (below 13000' MSL) to remain inactive when not in use.
- Avoids extending the Tombstone boundary to the north, impacting three popular New Mexico airstrips.
- Retains time of use for Reserve MOA to be "By NOTAM"
- Indicates time of use for all Low MOA tiers to be "By NOTAM" avoiding the appearance of a blanket closure of airspace.
- Uses MSL for defining floors whenever possible.
- Improves communication systems such that activation can be communicated to general aviation pilots via NOTAMS rather than blanket times of use (all weekdays, all daylight hours).

Key concerns based on our assessment of the impact on civil aviation are as follows:

**CONCERN 1: Proposed Low MOAs impact general aviation safety, particularly in mountainous areas**

VFR pilots are discouraged from transitioning through MOAs, but when the destination is within a MOA, or when no reasonable alternate routing options are available, general aviation traffic will enter a MOA.

Our concerns are greatest for five expansive MOAs in areas where there is a history of extensive transient and back-country flight, involving pilots from New Mexico, Arizona, and beyond. Specifically, Reserve, Morenci, Jackal, Outlaw, and Tombstone MOAs in Alternatives 2, 3, and 4. Civil aircraft will continue to fly within and through these MOAs, and low-altitude high-speed military flight will increase the risk of a collision.

Although military aircraft are equipped to spot small aircraft electronically, there are limitations in mountainous terrain and not all GA aircraft are ADS-B or even transponder equipped. Moreover, both electronic and visual detection of GA aircraft are distracting. The speed difference and small size of typical general aviation aircraft make avoidance difficult.

This safety concern is acknowledged by the USAF. Addressing MOAs, the July 2019 HAFB Midair Collision Avoidance Handbook provided to general aviation pilots regularly at local safety seminars states, "Pilots operating under VFR should exercise extreme caution while flying in a MOA during published hours of operation. . ." It also indicates that the Air Force recognizes that "Due to the



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nature of activities conducted in these MOAs, military aircraft could approach at extremely high rates of closure (e.g. supersonic) from virtually any angle. As a result, the ability to ‘see and avoid’ such traffic is almost eliminated.” (See Attachment 1). The likely increase in conflicts between VFR and military traffic in MOAs with lowered floors will be dangerous as well as disruptive to military training.

As an aside, a low-altitude “AGL” floor in a MOA that covers a mountainous region is ambiguous, since the highly variable topography makes for highly variable floors, difficult to maintain for high-speed aircraft. The floor of such MOAs would better be described using MSL, which is more clearly defined since it is independent of irregular terrain, leading to safer separation of civil and military aircraft.

### **CONCERN 2: Impact on civil aviation (public) access to recreational areas beneath the MOA**

Since 2009, NMPA has established the Gila National Forest as a backcountry flying destination, now recognized nationwide. NMPA and the NMDOT Aviation Division led the formation of the New Mexico Airstrip Network (NMAN), dedicated to increasing recreational aviation tourism and economic development in New Mexico. Since 2016, a Memorandum of Understanding (MOU) has formalized this partnership, recently extended with thirteen state and federal partner organizations including NMPA, the USFS, BLM, NMDOT Aviation Division, NM Economic Development, NM Tourism Dept, NM Council of Outfitters and Guides, and national aviation organizations including the Recreational Aviation Foundation, Experimental Aircraft Association (EAA), and the Aircraft Owners and Pilots Association (AOPA). See Attachment 2.

The Reserve Airport (T16) serves as a base for operations to 6 USFS airstrips: Negrito (ONM7), MeOwn (1NM0), Beaverhead (13NM), Jewett Mesa (13Q), Rainy Mesa (NM54), and Double Circle (AZ66). An additional airstrip within the Morenci MOA will be reopened in 2022. Demonstrating credibility, the USFS recognizes NMPA as a valued partner for volunteer maintenance and improvements at Gila airstrips, demonstrated by support for restoration of two long dormant airstrips and site development on others.

### **CONCERN 3: The negative impact on non-participating civil aviation traffic is greater than anticipated**

The Jackal/Outlaw/Morenci/Reserve MOA area is a well-used East/West low transition route between New Mexico and Southeastern Arizona. In addition to NMPA event traffic and direct-route GA traffic, hunters and guides utilize aviation to access the area, as does the New Mexico Dept of Game and Fish for enforcement.

Increasing military activity in Low MOAs in the western New Mexico conflicts with the New Mexico Airstrip Network goal to increase recreational aviation access to the New Mexico and Arizona backcountry including the Gila and Apache Sitgreaves National Forests. Moreover, it will adversely



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impact wildland firefighting aerial operations, especially air tankers, aerial supervision platforms, and lead aircraft in and around the Gila and on adjacent state and private lands during fire season.

Data compiled to establish traffic counts and civil aviation usage for studies such as this typically exclude “non-participating” aircraft, i.e., those that are not on an FAA flight plan. Moreover, due to mountainous terrain, radar and communications coverage are unavailable to low-flying VFR aircraft in most of the area under discussion. Pilots flying to NMPA events and work parties in the Gila National Forest from any direction typically report a loss of radar coverage and communications at lower altitudes throughout the mountainous areas. Significant volumes of aviation traffic use these areas but it is not documented, and will not show on civil aviation impact consideration tallies.

Because the remote and backcountry airfields in southwestern New Mexico are unattended, operations data for general aviation usage is not readily available. However, we estimate that there are over 300 general aviation flights per year to this area solely based on our organization’s involvement, not including transient traffic or events by other organizations. This activity is not limited to weekends.

#### **CONCERN 4: Sonic Booms at low levels over sensitive areas frequently used by General Aviation**

In addition to the potential for aviation traffic conflicts, sonic booms from 5000’ or 10000MSL would be strong enough and wide enough to impact aircraft in flight, recreation in the underlying Wilderness Areas, and local residents.

Although a higher base for supersonic flight (10,000’AGL) proposed in Alternative 4 would reduce the magnitude of sonic booms at ground level, it would also allow them to spread more widely. These changes represent a huge change from the current 30,000’ authorization.

#### **CONCERN 5: Impact on public and private airport operations and access**

The expansive lowering of floors for Outlaw and Jackal would redirect civil aviation visitors, analogous to closing off most of the AZ/NM border or encouraging MOA transition as described in Concern 1. When a pilot plans a flight, they plan a route least likely to cause a diversion. These expansions make route planning nearly impossible which will negatively affect New Mexico’s aviation tourism efforts.

The MOA expansions proposed in Alternatives 2, 3, and 4 would have huge impact on New Mexico. Specifically:

- Although the proposal overview touts no new MOAs added, Alternatives 2, 3, and 4, completely lower floors to either 100 or 500’AGL for Outlaw (2627 sqmi), Jackal (4714 sqmi), Bagdad (1410 sqmi) and Gladden (2476 sqmi), essentially doubling the volume of these four existing high MOAs. Note current floors are 8000’MSL, 11,000’MSL, 7000’MSL and 7000’MSL, respectively.
- The proposed expansions of lower floors (100 or 500’AGL) would be on the Sectional Chart with expected activation for essentially all weekday daylight hours, leaving no corridors for a pilot planning to travel across or through the area.

*The New Mexico Pilots Association (NMPA) is a grass roots organization of pilots, flight instructors, controllers, airport managers, and others with an interest in general aviation in New Mexico. Our mission is to promote general aviation, aviation safety, and preserve access to New Mexico airfields and airspace.*



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- Lowering the floor for Tombstone C and closing off corridors between the lower Tombstone A and C MOAs and combining the low and high MOAs.
- The proposal seeks to consolidate the new low MOA volume with higher altitude space, causing the whole volume of airspace to be Active and general aviation traffic to be diverted, even if only higher altitudes in the MOA are scheduled to be used.

Any revised airspace should retain corridors for clear access to existing public and private airports. Access should be maintained to instrument approaches to key community airports such as San Carlos Apache (P13) and Safford (SAD). In addition, general access to frequently used public and privately owned airports including Thurmond (NM12), Amigos del Cielo (NM90), and Rodeo (NM70) which are affected by proposed expansion of Tombstone. Public airports Kearny (E67) and Whiteriver (E24) lie within Outlaw and Jackal.

Changing Reserve MOA time of use to all daylight weekday hours significantly discourages access to Reserve Airport plus our Gila backcountry flying haven including Negrito, Rainy Mesa, Catron County, MeOwn, Beaverhead, and Double Circle Ranch airstrips.

**OVERALL CONCERN: Impact on civil aviation of increasing Airspace vs. Air Force training benefit**

Military Operations Areas already dominate airspace in the Southwest, significantly restricting free general aviation access. As with previous USAF proposals, we desire to work together to support truly needed functionality, while minimizing impact on general aviation. We welcome a discussion for mutual understanding of your training needs and our usage of airstrips, particularly within the Reserve, Morenci, and Tombstone MOAs, just as we did with Holloman AFB in 2020.

Significantly increasing MOA volume encourages more civil aviation conflicts which will disrupt training, defeating the purpose of this optimization. We request that mechanisms be explored to best utilize existing airspace including coordination across military branches, assure efficient and effective scheduling, and to communicate to the public when airspace is active.

In summary, for safety reasons, because proposed expansion of MOAs would significantly impede general aviation transit, and to preserve aviation access to prime New Mexico recreational areas, we request that given these alternatives, that Alternative 1, i.e., no changes to the existing airspace, be chosen. We appreciate the opportunity to comment. Please contact us with any questions.

*John Lorenz*

John Lorenz, President

New Mexico Pilots Association

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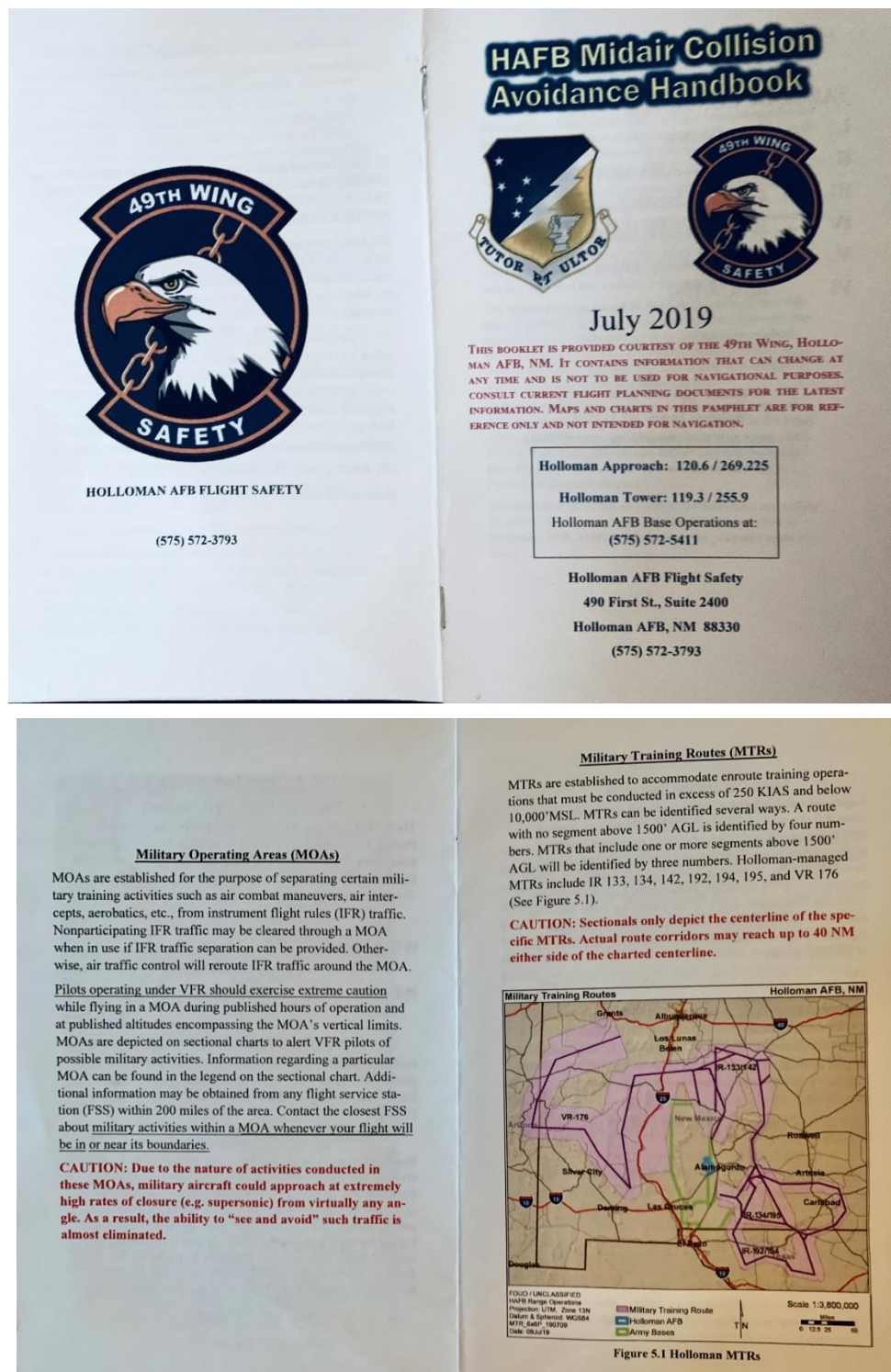
Website: [www.nmpilots.org](http://www.nmpilots.org)

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## Attachment 1: HAFB Midair Collision Avoidance Handbook



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## Attachment 2: New Mexico Airstrip Network (NMAN) Executive Overview – page 1



New Mexico Pilots Association: [www.nmpilots.org](http://www.nmpilots.org)  
NMDOT Aviation Division: [www.nmaviation.org](http://www.nmaviation.org)



### WHAT IS NMAN?

The New Mexico Airstrip Network (NMAN) is a coalition of multiple state and federal agencies, organizations, and private land owners with a common goal to increase public access to airstrips to promote tourism and economic development, while preserving the environment.

### WHY NEW MEXICO? WHY NOW?

Recreational aviation and backcountry adventures are a growing national trend, supporting a desire for more leisure and family time. Other states such as Idaho have demonstrated success in cultivating aviation tourism, now critical to many portal communities. New Mexico uniquely offers a longer flying season due to a shorter and less severe winter, plus unparalleled diversity, aerial vistas, and terrain.



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## Attachment 2: New Mexico Airstrip Network (NMAN) Executive Overview – page 2



### BENEFITS

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Airstrips offer increased access to New Mexico recreational destinations, enhancing biking, fishing, camping, hiking, hunting, etc. with the associated economic impact on nearby portal communities. Several western states (ID, UT, MT, CO and AZ) have enjoyed growth and impact from backcountry flying, partnering with volunteer organizations such as NMPA and RAF. Remote airstrips also provide access for emergency medical and wildfire operations.

### WHY FORMALIZE WITH AN MOU?

Since 2010, the New Mexico Pilots Association (NMPA) and the Recreational Aviation Foundation (RAF) have strived to expand backcountry flying in New Mexico. While progress has been made, a unified effort with partners including the USFS, BLM, state agencies, and recreational organizations such as the NM Council of Outfitters and Guides, will assure success and sustainability. NMAN is modeled after the Idaho Airstrip Network, formed to develop and improve the inventory of Idaho airstrip assets and quantify and expand economic impact. The NMDOT Aviation Division recognizes Idaho's demonstrated success as well as those of other western states, and believes New Mexico can benefit by modeling the Idaho process.

### STRATEGY AND ACTION PLANS

New Mexico has a wide range of public and private airstrips which offer excellent recreational opportunities, although currently not well utilized. The initial strategy and action plans define a coordinated effort to preserve and enhance airstrip access, and through marketing and education, demonstrate the sustainable value of airstrips as one of New Mexico's truly unique transportation assets.



### COST

Initially, costs will be administrative and take advantage of the passionate aviation volunteer community. There will be expanded costs for developing and maintaining airstrips which may warrant establishing a fund raising foundation.

### FUTURE VISION

New Mexico has a long and rich aviation tradition. Our vision reflects the values and a commitment of partners to maintaining and enhancing air access to New Mexico's recreational destinations, in which all New Mexicans can take pride.



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