

Jim McClay
Director Airspace, Air Traffic and Security
Regulatory Affairs

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Hello Jim,

I am the President of the Arizona Aviation Safety Advisory Group and we spoke during AirVenture about airspace activities taking place in Arizona, particularly the Parachute Jump activities. You asked for a follow-up email, an excellent idea, since I am sure our conversation may be a foggy memory with all the names and faces that you see during the week in Oshkosh.

The Arizona Aviation Safety Advisory Group (ASAG) is a 501 (c) 3 organization comprised of volunteers from throughout Arizona working with all users of our airspace to promote safe flight activities. We work closely with the Scottsdale and Las Vegas FSDOs, especially the FAA Safety Team Managers. We meet virtually, the third Wednesday of the month from 1200 to 1400 MST and are hosted on an FAA ZOOM account qualifying for Wings credit. The link for our meetings can be found on www.faasafety.gov. Our open meetings for anyone to attend, regularly include representatives from the flight schools, Phoenix and Tucson Approach, Airport Managers and Airport Traffic Control Managers, military representatives, law enforcement agencies, general aviation pilots, and FAASTeam Managers. During the meetings, we discuss monthly accidents, incidents, runway incursions, surface incidents, near mid-air reports, laser and UAS encounters, and other issues that could present a hazard to safe operations. We identify common causes or factors and look for ways to mitigate or correct errant behavior and hazards. Since many of our members are FAA Safety Team Representatives, many of the areas we discuss become the focus of our Wings Safety Seminars and education outreach.

During our latest meeting in July, a topic that took up a great amount of our attention, was the increasing use of the state's airspace for parachute jumping and equipment operations. We are not talking about sport operations that are common at airports like Eloy (E60), Buckeye (BXK), the Grand Canyon (GCN), and Hidden Valley, (south of Estrella Sailport (E68). These are operations conducted by Military and Government contractors, dropping special forces and their equipment, around the clock, using civilian airfields scattered throughout the state. We have captured some of the jump operations conducted at Marana (AVQ) in a "From the Flight Deck Video" that was produced by ASAG. It shows jumpers landing in the infield area, which conflicts with the instrument approach and missed approach procedures. It can be viewed at the 5:25 mark of this video: <https://youtu.be/kTBHrJnpGeo>. Arizona's weather attracts users from many nations, and we were recently informed of jump operations conducted by the Royal Air Force, when RAF Wing Commander Richard Lewis joined our meeting. Wing Commander Lewis commands the Airborne Delivery Wing, RAF Brize Norton, UK. We learned that the RAF is conducting operations at Bishop Airfield, a private field NW of

Estrella Sailport (E68), and Coolidge Muni (P08). Sawtooth, a private field nine miles SW of Eloy Muni (E60), Marana Regional (AVQ), and Pinal Airpark (MZJ) are other locations used by the military. We have received reports from Tucson Approach that Special Ops is using Benson Muni (E95), just east of Tucson. All airports are non-towered airports, in G airspace with E airspace above. Benson lies underneath T306 Airway. It is also next to Interstate 10, which is frequently used by VFR pilots transiting Tucson, so they can avoid the higher terrain to the north and south. All of them are beneath airspace that is heavily used by our state's flight schools, where flight training maneuvering occurs almost constantly. An alarming aspect of the drop operations is these are not standard drops conducted directly over the airfield. In some cases, they are HAHO, (High Altitude, High Opening) drops, where the jumper can be as high as the mid-30 Flight Levels, in A Airspace, open his or her *device* from over a hundred miles from the intended touchdown point, and glide through miles of airspace during the descent. Time in the air for the jump is approximately one minute for every thousand feet of altitude. One of the concerning issues is outside of published NOTAMS and calls made by jump aircraft or ATC, a pilot has no way of knowing where the jump object is, as there is no ADS-B read out. ASAG has no problem with these types of operations when they are conducted in a Restricted Area, but we are very concerned with the use of E and G Airspace, especially when it is close to the Phoenix and Tucson metropolitan areas. We are the home base for many premier flight training schools and in the case of Coolidge and Bishop airports, they are directly underneath the practice areas used by these schools and private instructors. We are also concerned about the high volume of transient pilots that we host during winter months. Many are ignorant of our airspace hazards, even without the addition of these drop operations. We feel it is just a matter of time before we have an unfortunate event, and considering the nature of the elements involved, it will probably mean loss of life.

ASAG feels this is an issue far above our ability to correct, since it concerns many domestic and international military organizations. I restate we are not opposed to conventional jump operations but feel the increased frequency and expansion of drop operations beyond what has been typical in the past, presents a clear and present danger to safe operations in our airspace. We welcome your attention, opinion, and assistance in this issue, which has ramifications beyond Arizona.

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