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April 25, 2016

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

Re: FAA Docket No. FAA-2016-4282 and Airspace Docket No. 16-AWP-3, Proposed Establishment of Temporary Restricted Areas R-2509E, R-2509W, and R-2509N; Twentynine Palms, CA.

Dear Mr. Stahl,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submit the following comments in response to the proposed establishment of temporary restricted areas R-2509E, R-2509W, and R-2509N at Twentynine Palms, CA. AOPA strongly supports the Marine Corps and understands their need for training areas that reflect modern battlefield requirements. We believe this training can be accommodated; however, AOPA contends the proposed airspace would unnecessarily impact general aviation pilots and should be modified so that the short duration training can take place with reduced impact on other airspace users.

Early Involvement

The military proponent involved AOPA early on in the discussions of the mission expansion at Twentynine Palms and the necessary enlargement of Special Use Airspace (SUA). Collaboration is very important to understanding and mitigating negative impacts so we applaud the proactive approach of the Marine Corps. AOPA understands Twentynine Palms is the only location in the National Airspace System (NAS) that meets their requirements for large scale exercises; however, there have been several steps for mitigation along this multi-year process that we believe have been missed. The proposed restricted areas would have an adverse impact on air traffic if their current dimensions are retained.

Impact to Busy Airway

The Twentynine Palms Special Use Airspace (SUA) complex is located in a major air traffic corridor. Traffic data provided by the Los Angeles ARTCC (ZLA) from August 10 through August 31 of 2015 shows a large number of aircraft transiting through the area proposed for the new restricted areas. In that three week period, over 1,200 general aviation aircraft transited through the airspace below FL180. Many more aircraft above FL180 flew through this airspace when transiting to and from Southern California.

The Victor Airway V-386, located between SOGGI and YUCCA intersections, is heavily utilized by VFR general aviation traffic and would be impacted by R-2509W. General aviation traffic that is VFR would no longer be able to utilize this airway unless they were able to fly above 8,000 feet MSL. Placing a restricted area, wherein hazardous activity is taking place, along an established and busy air traffic corridor, and not charting that restricted area, creates an inherently hazardous situation for pilots.

The area R-2509W overlies is also an area of lower terrain, beneficial to the pilot as it allows more room for maneuvering. The areas west are of much higher terrain with little room to maneuver provided between R-2509W and the mountains. Adding this additional SUA to an already large complex will further constrain low-altitude general aviation and force them to fly closer to areas of precipitous terrain. Pilots forced to fly further west around the temporary restricted areas will have to fly through congested Southern California airspace, areas of high terrain, and will have the economic hardship of increased flight time and fuel costs. Allowing a temporary restricted area in such a busy area where pilots have become accustomed to flying within the valley would place many pilots at high risk for an airspace incursion and in an unsafe position near hazardous activity.

AOPA contends these factors make the enactment of R-2509W to be a high hazard for general aviation and that this restricted area should not be enacted. The location and lateral dimensions of R-2509N and R-2509E allow general aviation to continue to use the valley and V-386 for navigation and will not unacceptably put a large number of pilots at risk.

Times of Use

The proposal states activation for the restricted areas would take place by NOTAM but fails to state how much advance notice pilots would receive. Pilots cannot adequately flight plan should this airspace be activated after they depart. Modern general aviation aircraft can have over six hours of fuel endurance; however, having to deal with a long reroute can lead to issues of the pilot not having enough fuel and thus being forced to divert for fuel. At least six hours advance notice is necessary to assist pilots with their flight planning, particularly for uncharted temporary SUA, and to help them avoid costly reroutes or the need for fuel diversions. The times of use should be changed to “as published by NOTAM issued 6 hours in advance of area activation.”

Outreach

Alerting local and transient pilots of the three week large scale exercise is a necessary mitigation the military proponent should be strongly engaged in. Robust outreach with local pilot groups, such as the Southern California Airspace Users Working Group, state pilot groups, national pilot associations, airports, and fixed base operators will be needed to reduce the impact of the SUA and to ensure pilots stay away from the hazardous activity. AOPA stands ready to support the military proponent’s outreach efforts. Additional outreach using FAA mechanisms, such as a FFAST Blast, should also be investigated to ensure wide dissemination.

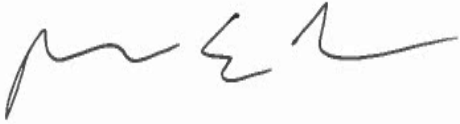
Graphics of historical traffic flow in the Twentynine Palms area shows air traffic flies very close to the existing boundary of the restricted areas. The lack of charting will hurt pilot awareness so providing graphics of the airspace overlaid on a sectional will be very important.

Conclusion

The Marine's proposal for R-2509W would place hundreds of pilots at risk for violating the restricted area's boundary during the three week exercise being planned. AOPA believes this proposed restricted area cannot be mitigated due to its location which puts it in the middle of an established busy corridor for general aviation traffic. The restricted area would also force many pilots to deviate further west and into complex, congested airspace and areas of high terrain.

AOPA recognizes and fully supports the Marine's need to train as they fight. The Twentynine Palms SUA complex represents a unique training asset for the Marines which, if carefully managed, will result in meeting the Marine's training needs while avoiding or mitigating the impact on general aviation flight operations. Thank you for reviewing our comment on this important issue. Please feel free to contact me at 202-509-9515 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rune Duke', with a stylized, cursive script.

Rune Duke
Director, Airspace and Air Traffic

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members and establish, maintain and articulate positions of leadership to promote the economy, safety, utility and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization the world.