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September 26, 2016

State Corporation Commission
Attn: Joel H Peck, Clerk
Document Control Center
PO Box 2118
Richmond, VA 23218

RE: Application of Appalachian Power Company (Case No. PUE-2016-00011)

The Aircraft Owners and Pilots Association (AOPA) is the world's largest aviation organization, representing the general aviation interests of pilots and aircraft owners, including more than 10,000 of our members based in the state of Virginia. On behalf of our membership, we write this letter to express our concern with the Appalachian Power Company (APCo) proposal [PUE-2016-00011] for a new 138kV power line less than 1 nautical mile (nm) from the end of the primary runway of the Virginia Highlands Airport (VJI).

Safety is the primary pillar upon which airport development rests. The Airport Layout Plan calls for lengthening Runway 6 – 24 by approximately 1,000 ft. The basis for this increase as stated in the current ALP: *“the primary runway 6 – 24 is not adequate to serve the critical aircraft for the duration of the 20-year planning period.”* – [VJI ALP Page 5-4(a)]. Allowing the proposed project to commence with 125 foot towers linked by high power transmission lines 100 feet above ground level (AGL) so close to VJI may jeopardize future development for new instrument approaches to accompany the lengthened runway and will negatively impact safety.

As evidence of these safety impacts, the non-precision Localizer Instrument Approach to Runway 24 [LOC RWY 24] allows pilots to descend to a Minimum Descent Altitude (MDA) 433 ft AGL within 2.5 nm of the Runway Threshold (landing area). The proposed obstructions would reduce this safety margin between aircraft and those objects affecting navigable airspace. The Federal Aviation Administration's (FAA) only recourse would then be to raise the MDA which decreases the airport's usability (utility) during inclement weather conditions and thereby decreases safety. This can have a negative impact on the airports ability to serve critical aircraft as described by the ALP.

In addition to aircraft using instrument approaches, aircraft flying within the Airport Traffic Pattern will also be negatively impacted by the Transmission lines. The airport traffic pattern is a standard pattern followed by aircraft during visual meteorological conditions. While any aircraft seeking to land at VJI may be present in the airport traffic pattern, statistically, student pilots spend a higher percentage of time within the area immediately adjacent to the airport. As this pattern extends beyond a mile from the end

of the runway, placing obstructions below the pattern presents the increased potential for collision. Furthermore, the most critical phase of flight is during takeoff, below 1,000 ft AGL when aircraft are at their lowest altitude and slowest speed. Due to the lack of altitude, when aircraft lose power during this phase of flight, pilots are often obligated to land as straight ahead as possible using only shallow banks to avoid obstacles. High-power Transmission Lines planned perpendicular to a distressed aircraft's flight path is a recipe for collision. For these reasons, AOPA opposes proposal PUE-2016-00011.

It should be noted that as of the date of this writing, the Federal Aviation Administration (FAA) has not concluded the Part 77 Airspace Obstruction Evaluation [2016-AEA-8421 to 8458] to know the full impact of the project. Moreover, the FAA has no direct authority to prevent such utility projects from moving forward despite the negative safety implications. Therefore, it is incumbent upon the State of Virginia to protect the Virginia Highlands Airport, its users, and neighbors. AOPA is committed to ensuring the safety, future viability, and development of general aviation airports as an integral part of a national transportation system. We thank you for the opportunity to add our voice to the discussion of this important issue. Please consider AOPA a resource on behalf of our members, Virginia residents. We can be reached at (301) 695-2090.

Sincerely,

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

Sean Collins, AOPA
Eastern Regional Manager