



50 F St. NW, Suite 750
Washington, D.C. 20001

T. 202-737-7950
F. 202-273-7951

www.aopa.org

October 5, 2016

Mr. Paul Gallant
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-2016-8927 and Airspace Docket No. 15-ANM-24, Notice of Proposed Rulemaking for Proposed Establishment of Restricted Area R-2603; Fort Carson, CO.

Dear Mr. Gallant,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submits the following comment in response to the Notice of Proposed Rulemaking (NPRM) for the proposed establishment of Restricted Area R-2603 at Fort Carson, CO. AOPA strongly supports the Army and understands their need for training areas that reflect modern battlefield requirements. We believe this training can be accommodated in the proposed area; however, AOPA contends the proposed Restricted Area would unnecessarily impact general aviation and that the airspace should be modified to mitigate the negative impacts.

Impacts to Instrument Flight Rule (IFR) Aircraft

The proposed Restricted Area would adversely impact the V-81 and V-169 Federal Airways. Per the FAA's aeronautical study, scores of Instrument Flight Rule (IFR) aircraft utilize these airways every year. The Minimum Enroute Altitude (MEA) for V-81 is 7,700 feet MSL and for V-169 it is 8,100 feet MSL. The ceiling for R-2603 would be 10,000 feet MSL with it extending continuously from the surface. General aviation aircraft must routinely operate IFR at lower altitudes to stay out of icing and due to performance limitations. Requiring an aircraft to fly several thousand more feet than is currently required, staying above R-2603's ceiling, could impact general aviation's ability to transit these airways when the Restricted Area is active.

The Piñon Canyon Maneuvering Site Final Environmental Impact Statement (FEIS) states, "Federal Airways will be less important in the near future and may be deactivated all together as the FAA progresses towards full implementation of the Next Generation Air Transportation System (NextGen) utilizing the Performance Based Navigation (PBN) methodology of ATC." Later on, the FEIS states, "these systems [Federal Airways] will be phased out over the next 20 years as the FAA begins to implement its 'Next Gen' ATC system."

AOPA disagrees with the suggestion that VORs and their associated airways will not be needed in the near future in areas like Fort Carson. Furthermore, we disagree that because certain airways may be going away, the utilization of these impacted airways are not important to be

accounted for as part of this rulemaking effort. It is important to note none of the VORs that anchor the airways that cross the proposed Restricted Area or the existing MOA are scheduled to be decommissioned as part of the VOR Minimum Operational Network (Final policy statement Docket No. FAA-2011-1082).

The FAA drafted their VOR MON criteria to retain the airways, and the NAVAIDs that define them, in areas like Fort Carson because of various factors that make their retention important for general aviation for the foreseeable future. The factors include regular GPS interference events (similar to what the proponent intends on conducting within the Restricted Area) and mountainous terrain which necessitates established airways with low MEAs. The low MEAs of V-81 and V-169 are uniquely important as they are the lowest when heading west bound from Tobe VOR/DME (TBE) or East bound towards TBE. Pilots, forced to fly further south to avoid the Restricted Area, will need to fly through areas of high terrain with higher MEAs, and will have the economic hardship of increased flight time and fuel costs.

The proponent and the FAA should work together to keep these airways accessible given their proven need for general aviation. AOPA proposes R-2603's ceiling be limited to 8,000 feet MSL so that both airways can remain accessible when the Restricted Area is active. This top altitude for the Restricted Area will allow flights to continue at an altitude similar to what they can be flown at today, despite the airspace being active.

The outer boundaries of the proposed Restricted Area impact V-169 and a feeder route for the Perry Stokes Airport (TAD) RNAV (GPS) RWY 21 instrument approach. The proponent should modify the boundaries to relocate the eastern border (373833N1033511W) to the west at least 3 NMs from V-169's centerline. Enabling a 3 NM separation would allow this airway to be utilized when the Restricted Area is active. Lowering the top altitude of the Restricted Area to 8,000 feet MSL would also be an acceptable mitigation to keep V-169 accessible.

Likewise, the western boundary (373227N1040632W) should be relocated further east to not impact the feeder route from BLOOM intersection on the RNAV (GPS) RWY 21 approach into TAD. Feeder routes increase efficiency for pilots conducting an arrival into an airport. The efficiency translates into reducing flight time, saving fuel, and saving money. Alternatively, prior to the Restricted Area being activated, the proponent should request the FAA to redesign the approach into TAD so that the feeder route is initiated at JUKEX instead of BLOOM. The proponent should commit to not using the Restricted Area until the procedure is amended or the western boundary relocated.

Impacts to Visual Flight Rule (VFR) Aircraft

In addition to the western boundary (373227N1040632W) impacting the feeder route into TAD, this boundary point impacts one of the few Visual Flight Rules (VFR) navigation references in that area. Pilots flying under VFR routinely follow prominent railroads and highways to get to their destination. US Route 350 and a parallel railroad proceed from TAD to LHX. Following this route would keep a pilot clear of the restricted area; however, the western boundary point is uncomfortably close for many pilots to utilize this route without proceeding unnecessarily north of the road and tracks. Pilots may continue to use this popular VFR route should the Restricted Area be enacted and could routinely fly very close to the boundary or even violate it when it is

marginal VFR. Relocating this western point to be further east would enable pilots to continue comfortably using one of the few prominent VFR features in that area.

Charting the Restricted Area

The activation of the new Restricted Area should occur concurrently or after the charting of the airspace on the Denver and Wichita Sectional Charts. Pilots do not normally check the Chart Bulletin and could easily overlook the statement concerning R-2603's enactment, especially because the FAA does not provide a graphical depiction of what the new airspace looks like in the bulletin. Transient pilots who do know of its existence might think they are clear of the airspace, but may very well be inside its boundary due to this lack of charting.

The FAA should make the effective date of Restricted Area airspace coincide with the Sectional Chart cycle so that pilots have the latest information and a graphical depiction of the change. The impacted Sectional Charts are updated on January 5, 2017. As this chart date is in the near future, AOPA does not view this request as a burden to the FAA or to the local proponent, given the safety benefits and increased situational awareness the graphical depiction will provide to VFR pilots.

The instrument approach procedures to airports in proximity to R-2603 should be updated to graphically depict the new Restricted Area to increase situational awareness for instrument pilots. Similar to the Piñon Canyon MOA being charted on the procedures into La Junta Municipal Airport (LHX), the Restricted Areas and MOA should be added to TAD's approach and departure procedures.

Times of Use

As part of the Colorado Airspace Initiative, the Piñon Canyon MOA had its boundaries modified in December 1999. The airspace circular for the modification (Air Traffic Division Letter to Airmen No. 98-03; Study No. 98-ANM-001-NR) stated the MOA "would not be scheduled for use between 10:00 pm and 7:00 am local." The FEIS states Piñon Canyon MOA's utilization is "low" and that in 2012 had only eight days of activation.

We are concerned the proponent's intention may be to activate the existing MOA whenever the Restricted Area is in use. This issue is not addressed in the FEIS or in the NPRM. Considering the NPRM for the Restricted Area states, "the area would be required to support approximately five training cycles per year with the longest duration of each cycle being approximately four to five weeks," we believe the previous statements made in the Letter to Airmen to limit utilization of the MOA may not be honored. The proponent should continue the overnight embargo on the MOA's utilization and should only activate the MOA when it is explicitly needed to support operations. Activating the MOA continuously for five weeks is not responsible management of the airspace and would have a considerable impact on civil aviation in the area.

The Piñon Canyon MOA impacts several flight procedures beyond what the proposed Restricted Area impacts, including arrivals into TAD from TUNEE on the RNAV (GPS) RWY 21 instrument approach. As was previously stated, feeder routes increase efficiency for pilots and decrease the fuel requirements to complete the flight. The proponent should limit the utilization

of the Piñon Canyon MOA to what is justifiably necessary and should continue to limit overnight operations per the 1999 commitment.

The proposal states activation for the Restricted Area would take place by NOTAM, but fails to state how much advanced 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, thus being forced to divert to refuel. At least six hours advanced notice is necessary to assist pilots with their flight planning 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.”

Conclusion

The Army’s proposal for R-2603 will have an impact on many IFR and VFR aircraft the approximately five weeks per year it is activated. Activating the Piñon Canyon MOA in combination with the Restricted Area will cause even more adverse impacts. The Army should work to modify the proposed airspace to better accommodate general aviation pilots and should justify any increase in use of the Piñon Canyon MOA.

AOPA recognizes and fully supports the Army’s need to train as they fight. The Piñon Canyon Maneuvering Site represents a unique training asset for the Army which, if carefully managed, will result in meeting the Army’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,



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 in the world.