

421 Aviation Way Frederick, Maryland 21701

T. 301-695-2000 F. 301-695-2375

www.aopa.org

November 2, 2012

Mrs. Amy Burt Naval Facilities Engineering Command Northwest 1101 Tautog Circle, Suite 203 Silverdale, WA 98315-1101 Attn: NWSTF Boardman Project Manager

Re: Draft Environmental Impact Statement for Naval Weapons Systems Training Facility Boardman, OR

Mrs. Burt,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, submits the following comments in response to the Draft Environmental Impact Statement (DEIS) for military training activities at the Naval Weapons Systems Training Facility (NWSTF) Boardman, OR. AOPA would offer that any request for new Special Use Airspace (SUA) must include the return of existing unusable SUA as described in the DEIS.

## **Release of Airspace**

Based on the DEIS, the justification for requesting new SUA is a result of the proliferation of obstructions in the national airspace system (NAS). AOPA understands the challenges that exist from competing interests within the NAS and their associated impact on airspace operations. In light of the fact the Department of the Navy (DoN) has indicated the existing SUA is no longer useable or adequate for training, we strongly urge the DoN to return all SUA that can no longer be used. Any request for new SUA resulting from the encroachment of wind turbines, should be accompanied by a return of airspace that no longer meets the needs of the DoN training requirements. This giveback of airspace will allow for the continued use of this airspace for civilian operations as necessary.

## **Summary**

We appreciate the opportunity to comment on the DEIS for Naval Weapons Systems Training Facility Boardman, OR. AOPA strongly encourage the DoN to return any unused airspace back to the NAS as they seek to establish new SUA to meet mission and training requirements.

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Thank you for the opportunity to submit comments on DEIS for Naval Weapons Systems Training Facility Boardman, OR.

Sincerely,

Melissomalaffrey

Melissa McCaffrey Senior Government Analyst Air Traffic Services