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March 26, 2013

Mr. Gene A. Zirkle
NEPA/Wildlife Program Manager
Building 2159, 13th Street
Fort Campbell, Kentucky 42223

Re: Public Scoping Meetings for the Programmatic Environmental Impact Statement to evaluate the impacts of current and future training and mission-related activities at Fort Campbell, KY.

Mr. Zirkle,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Programmatic Environmental Impact Statement (PEIS) to evaluate the impacts of current and future training and mission-related activities at Fort Campbell, KY. AOPA offers the following input with regard to the implementation of new airspace and training areas for the use of Army Unmanned Aerial Systems (UAS) operations and the associated mention of new restricted airspace for non-hazardous activity.

Purpose and Need Appear to be a Solution in Search of a Problem

AOPA is concerned with any intent to create new restricted airspace for other than hazardous operations. The consideration of a new restricted area for UAS operations which do not constitute "hazardous activity" is unacceptable. In lieu of establishing a permanent airspace area designated for hazardous activity, we would urge the Army to work with the Federal Aviation Administration (FAA) to utilize least restrictive measures, which would include ground based or other airborne assets to meet training requirements.

In addition, the deployment or operation of UAS within a Military Operations Area (MOA) aside from specific perimeters allowed via a Certificate of Authorization has not typically been authorized. While we recognize the need to conduct training operations that mirror real world operations, without adequate detect and avoid mitigation as required by 14 CFR Part 91.113, the widespread use of UAS within a MOA will not be palatable to the civilian operating community who legally transit MOA airspace.

It is concerning that during public scoping meetings the Army acknowledged there are no current customers requiring the airspace to be implemented for UAS activity. Without a current or planned future use of this airspace beyond "temporary needs", there does not appear to be solid justification for any new airspace areas at this time. Without justification and a current need

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there should be no request for additional airspace. The National Airspace System (NAS) is a finite resource and we are all required to be good stewards of this resource. Pursuing additional Special Use Airspace when there is no justified customer or need seems a solution in search of a problem.

Temporary MOA could accomplish goals

Per order 7400.2, Procedures for Handling Airspace Matters, Chapter 25-1-7 "Temporary MOAs are designated to accommodate the military's need for additional airspace to periodically conduct exercises that supplement routine training". Based on the information provided during public meetings, training exercises would take place approximately nine days every three months, which equates to about 32 days a year. Full time establishment of special use airspace (SUA) is extreme considering the MOA would be inactive nearly 87% of the year. A Temporary MOA could address the military's need for training airspace for other than UAS activity while substantially reducing the impact on general aviation.

Summary

While AOPA appreciates the opportunity to submit comments, we are concerned with the Army's consideration of utilizing new SUA or MOAs for UAS operations. The purpose and need is not consistent or justified, the use of MOAs for UAS activity does not comply with FAA regulations and there is a need to consider a Temporary MOA to accomplish the Army's goals for other than UAS operations. AOPA encourages the Army to utilize early and consistent dialogue with the user community during and after the National Environmental Policy Act process.

Sincerely,

A handwritten signature in black ink that reads "Melissa McCaffrey". The signature is written in a cursive, flowing style.

Melissa McCaffrey
Senior Government Analyst
Air Traffic Services