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October 20, 2015

Ms. Michelle Cruz
Operations Support Group
Western Service Center
Federal Aviation Administration
1601 Lind Ave. S.W.
Renton, WA 98057

Re: Aeronautical Study 14-ANM-13NR, 14-ANM-21NR, and 14-ANM-25NR; Proposal to Modify and Expand Special Use Airspace

Dear Ms. Cruz,

The Aircraft Owners and Pilots Association (AOPA), representing over 300,000 members nationwide, submit the following comments in response to the establishment and modification of military training airspace. The proposal would create new Military Operations Areas (MOA) in close proximity to general aviation airports, commonly used airways, and VFR aircraft flight corridors. AOPA believes the establishment and expansion of this Special Use Airspace (SUA) would have a negative impact on general aviation in the Northwestern United States region in terms of safety and accessibility.

Juniper and Hart MOAs

Airway V-357 transits through the proposed Hart A, Juniper Low, Juniper East Low, and Juniper A, B, and C MOAs from Lakeview VORTAC (LKV) to Wildhorse VOR/DME (ILR). The Minimum Enroute Altitude (MEA) on this segment is 10,000 feet MSL; however, V-357 is restricted to below 11,000 feet MSL when either Hart A, Juniper A, B, or C MOA are activated. This means IFR traffic are constrained between areas of high elevation below and military aerial activity above in a corridor that allows a cruising altitude of only 10,000 feet MSL. The addition and expansion of Low MOAs would further impact this airway by making it all but unusable to IFR traffic unless air traffic control and traffic conditions could accommodate.

Airway V-122 extends from LKV to Rome VOR/DME (REO) and is similarly impacted by this proposal. Hart A and C MOA have a floor altitude of 11,000 feet MSL but V-122 has an MEA of 12,000 feet MSL. This results in the east-west corridor being unusable at any point either of these MOAs are activated. Pilots must flight plan and expect to have to circumnavigate a huge amount of airspace in order to fly to Burns Municipal Airport (BNO) from the east with V-122 or V-357 unavailable. The distance to BNO from LKV via V-357 is 95 NMs versus 195 NMs if pilots are forced to take V-122. The routing is even longer if pilots are denied V-122 as well. VFR traffic could still fly to BNO from the east but would need to transit through several MOAs, possibly when the military is utilizing the airspace.

A reasonable mitigation to reduce the negative impact on civil traffic would be to reduce the Juniper Low and Juniper East Low MOA ceiling from 11,000 feet to 10,000 feet MSL. Lowering the ceiling would allow V-357 to be passable during any period of MOA activation. Raising Hart A and C, and Juniper A, B, C MOAs floor altitude to 12,000 feet MSL would allow a reduced workload on air traffic control and allow traffic to fly east and westbound simultaneously. Creating a 2,000 foot buffer corridor would allow IFR and VFR traffic a reliable and efficient path through this large proposed SUA complex.

This MOA complex would further impact the RNAV (GPS) RWY 30 instrument approach procedure into BNO. The feeder route for this approach allows pilots to proceed to the Initial Approach Fix and join the

approach; however, this segment would be negatively affected as NIDIC intersection would now be within Juniper C MOA. FAA JO 7400.2 states “provisions must...be made to accommodate instrument arrivals/departures at affected airports with minimum delay.” The impact to this instrument approach procedure and to V-357 could cause greater delay to arrivals at BNO and have an adverse aeronautical effect. A solution to this issue would be to reduce the overall size of Juniper C MOA by moving the eastern boundary to be further west. Creating a larger buffer between this MOA and BNO would reduce the negative impacts on BNO.

Eel MOAs

Several existing airways would be impacted and limited by the proposed Eel MOAs having a base altitude of 11,000 feet MSL. The Astoria VOR/DME (AST) to Newport VORTAC (ONP) route on V-27 has a MEA as high as 8,000 feet MSL when northbound. IFR traffic on this airway along the coast would have few altitude options should this MOA be active. Other airways impacted include V-112, V-182, and V-187. Ensuring these airways are available to IFR traffic is critical to ensuring accessibility to the airports below and for transients heading to northern or southern Oregon.

Flying the coast is a popular VFR method of navigation. Should these MOAs be active, VFR traffic flying this popular sight-seeing route would need to constantly be on alert due to the unusual flight activity taking place around them. Creating MOAs along coastlines should be avoided due to the nearby availability of Warning Areas offshore. AOPA contends the Warning Areas discussed in this proposal could be reasonable alternatives to the Eel MOAs and would have less of an impact on civil aviation.

Redhawk MOAs

The proposed Redhawk MOAs would adversely impact several airways should the base altitude be set at 11,000 feet MSL. Due to high elevation and other factors, the MEA for many airways crisscrossing the planned MOA area are already slightly below or above 11,000 feet MSL. The critical Kimberly VORTAC (IMB) is within this impacted area and has several airways emanating from it that have MEA's at or above 9,000 feet MSL. IFR traffic flying lower than the MEA in this area would not likely be feasible or safe. These airways may become unavailable and require pilots to fly many miles out of their way and at a high cost in fuel. Increasing the Redhawk MOA floor altitude to 12,000 feet MSL in this area would benefit the civil users needing to fly beneath the MOAs but on an IFR airway. Pilots operating to and from Roberts Field Airport (RDM) on an IFR flight plan would also benefit from the Redhawk MOA floor being increased in terms of greater operational efficiency.

Conclusion and Recommendations

For the reasons stated above, AOPA believes the proposal outlined in the Aeronautical Studies would adversely impact general aviation. We believe measures should be taken by the military proponent and the FAA to adequately accommodate civil aviation and preserve the airspace accessibility in the region. AOPA has several additional recommendations in this area that we believe could improve access and safety:

- The proposed time of use of “intermittent by NOTAM” does not allow flight planning as a general aviation pilot could take-off and find out enroute a MOA has made his airway unavailable. The pilot may be forced to fly at a lower altitude that could have adverse winds or force him to be closer to high terrain. A fuel stop may even become necessary. The airspace proposal details that there will be advanced planning and scheduling for the military training flights so failure to give appropriate advanced notice does a disservice to other airspace users. Increasing the required notice for all proposed and current MOAs to be active should be through a NOTAM issued a minimum of 4 hours in advance as that would account for the approximate fuel

endurance of many general aviation aircraft. Possible times of use language could be “by NOTAM 4 hours in advance.”

- Any change in airspace configuration must coincide with the VFR charting cycle to ensure the flying public is aware of the change. Safety could be impacted should the airspace change be made before the change is charted and widely disseminated to pilots. The Powder River Training Complex is an example of a large expansion of SUA that was synchronized with the sectional charting cycle and we believe the size of SUA proposed in this study warrants a similar requirement.
- As previously stated, AOPA believes the FAA should consider higher floor altitudes for MOA’s as the availability of many airways could be improved should the base altitude be increased just a thousand feet. Decreasing the ceiling altitude on the Low MOAs would also provide a benefit to pilots and air traffic controllers.
- A Letter of Agreement (LOA) between the military proponent and the Seattle ARTCC should be investigated as a possible method for mitigating the negative impacts to IFR traffic. An LOA is already in place between the military and Salt lake ARTCC to accommodate civil IFR traffic transiting through the Powder River Training Complex. Putting a process in place for air traffic control to recall military aircraft out of the Low MOAs would have a benefit for civil air traffic. Allowing non-participating IFR traffic to safely transit the MOAs should be a top priority.
- Due to the large size of the special use airspace being proposed, it could be impractical for aircraft to circumnavigate it without great expense and time. A real-time airspace status hotline and an inflight frequency pilots can call should be established and charted to assist pilots with flight planning, general traffic advisories, and airspace status alerts.

The AOPA understands and supports the Oregon Air National Guard’s need to train in order to have the readiness to support the national defense. We believe this training can be done in a manner that will not cause an undue negative effect on general aviation. The FAA should negotiate with the military proponent changes to the proposal so that the impact on other airspace users is mitigated.

Thank you for the opportunity to comment on this important issue. If you have any questions, please feel free to contact me directly.

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.