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February 9, 2016

Mr. Steven Seip, P.E.
Department of the Air Force
436 CES/CEIE
600 Chevron Avenue
Dover AFB, DE 19902-5600

Re: Draft Environmental Assessment (DEA) for Flight Operations at Dover Air Force Base, Delaware

Dear Mr. Seip,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submit the following comments in response to the Draft Environmental Assessment (DEA) for Flight Operations at Dover Air Force Base (DOV), Delaware. Although AOPA supports the United States Air Force (USAF) and the mission of the C-17 and its crews, it is important that the USAF consider general aviation air traffic near DOV in determining how operations will be safely conducted. AOPA contends there would be far less impact if low altitude operations took place in or under the Patuxent Restricted Area complex south of DOV.

Existing Special Use Airspace and Routes

There are several existing Slow Routes in the vicinity of DOV that are not fully addressed in the DEA. A Slow Route meets the same requirements as the locally-defined VFR routes, like that of the existing Monster North and South, and should be considered as alternatives to any new route. The proposed Monster West route appears to be similar to the existing Slow Route 800, 801, 844, and 845. The DEA does not address why these existing routes are not sufficient to meet the necessary training requirements of the USAF. AOPA believes these existing routes should be utilized whenever possible due to their similarities with the proposed Monster West route. It could be less impactful on general aviation operations if these existing Slow Routes were redesigned to begin and end at DOV which would also meet the training requirements of the USAF flight crews.

Additionally, there are several existing Slow Routes in the less congested Shenandoah Valley and where the terrain is similar to places like Colorado or Afghanistan. These alternate routes should be considered as they have historically been utilized with few impacts on civil aviation.

The proposed Monster West locally-defined VFR route would bring large, heavy jets at speeds of up to 250 knots to the same altitudes and areas frequently trafficked by small and slow general aviation aircraft. The route is within close proximity to about 40 airports which magnifies the impact of these large aircraft operating so close to traffic pattern altitudes. One of the considerations must be the wake turbulence of these large aircraft which can upset a small plane simply by being in close proximity.

AOPA contends the area around DOV is too congested for routine low altitude operations and would propose the USAF utilize the area within and below the Patuxent Restricted Area complex, which is comprised of R-4002, R-4005, R-4006, and R-6609, for low altitude operations. As is stated in the mid-air collision avoidance pamphlet provided by the 436th Airlift Wing at DOV, “the potential for a mid-air collision is extremely high” in the area around DOV due to congestion.

The Patuxent Restricted Area complex is located in close proximity to DOV and could be made accessible by the creation of a Slow Route or locally-defined VFR route direct to this area. The Maryland Department of Transportation’s letter in response to the preparation of the DEA mentions this same idea; however, it was not addressed in the DEA. The new route could begin and end at DOV thus allowing for an increase in realism and the reduction in cost the USAF desires. The impact to general aviation would be far reduced if the low altitude, high speed training was conducted in or under the Restricted Area primarily because there are far fewer airports in close proximity. This area would offer similar terrain so that crews could conduct the same type of training (GPS degraded operations) proposed for the Monster West route. The USAF should negotiate with the using agency of the Patuxent Restricted Area complex to determine how compatible the USAF’s training is with their existing operations, and how the joint use of this Special Use Airspace could mitigate adverse impacts on general aviation by using this more remote location.

Utilization of Routes

It is anticipated the proposed Monster West route would be utilized several times each week and usually during the day. Notably the route’s utilization will not be on weekends, which are the peak of general aviation activity, so this offers an important mitigation. The USAF should ensure the commitment to not fly the Monster West route on weekends is contained in the final decision because the negative implications of this route’s path through a congested area would be magnified if it was to be utilized on weekends.

The existing Monster North and South routes are located in a less congested area that makes them more compatible for the time periods general aviation activity would be high. Removing Monster West from consideration and creating a new Slow Route or locally-defined VFR route, with input from stakeholders, from DOV to the Patuxent Restricted Area complex would greatly reduce the concern for negative impacts to civil aviation. The establishment of any additional routes or Special Use Airspace should only take place through a collaborative process involving all users of the national airspace system.

Public Outreach

Slow Routes and locally-defined VFR routes are not published on Sectional Charts so alternate methods of alerting local and transient pilots to commonly used military routes is critical to increasing pilots’ situational awareness. Outreach for any new routes should include state aviation organizations, airport operators and sponsors, pilot groups, air traffic control, and aviation associations. The mid-air collision avoidance pamphlet and poster provided by the 436th Airlift Wing at DOV should be updated to reflect changes, as well as Slow Routes and locally-

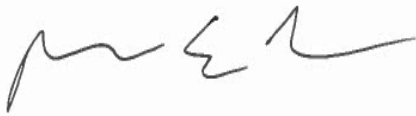
defined VFR routes overlaid on a Sectional Chart. It is important the military proponent's safety arm sustain their outreach as it is welcomed by the aviation community and is a powerful education tool.

Conclusion

AOPA supports the USAF's need to train in order to have the readiness to support the national defense and its fiscally responsible approach to executing this training. We believe the removal of the Monster West route and the creation of a new route from DOV to the Patuxent Restricted Area complex will reduce the negative impacts on general aviation that the changes proposed in the DEA would create and still allow the military to train realistically.

Thank you for the opportunity to comment on this important issue. If you have any questions, please feel free to contact me directly at 202-509-9515.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rune Duke', written over a light blue horizontal line.

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.