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September 18, 2017

Holloman AFB Airspace EIS  
c/o Cardno  
501 Butler Farm Rd., Suite H  
Hampton, VA 23666

**Re: *Notice of Intent to Prepare an Environmental Impact Statement for the Special Use Airspace Optimization Project, Holloman Air Force Base, New Mexico.***

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submits the following comment in response to the United States Air Force's (USAF) notice of intent to prepare an Environmental Impact Statement (EIS) for the Special Use Airspace (SUA) Optimization Project at the Holloman Air Force Base, New Mexico. We support the USAF's mission and appreciate their need to train in a realistic environment. AOPA is encouraged by this opportunity to redesign the SUA in this area to be more efficient for the proponent and for civil aviation users. As few details exist at this time, we offer the following general comments regarding general aviation's interest in this geographic area and opportunities for the proponent to reduce the impact of future SUA. Large SUA complexes can have significant economic impacts on general aviation so we appreciate the proponent considering mitigations to reduce their negative effects.

### **Proposed changes will impact general aviation**

AOPA notes that Alternative 1, which would entail expansion of the Talon Military Operations Area (MOA) further east, would not result in any additional civil airports underlying SUA. Airports that underlie SUA can be adversely impacted by access limitations for Instrument Flight Rule (IFR) aircraft. The impact of these limitations can have long-term financial impacts on the airport businesses, the aircraft operators, and the surrounding communities. Aircraft flying under Visual Flight Rules (VFR) can also be discouraged to fly to airports located under active SUA due to the unusual activity that takes place in the airspace around them.

Alternative 2 includes expanding the Cato and Smitty MOAs, and creating a new Lobos MOA, which could result in more airports underlying SUA. The USAF must consider the impact on those specific airports, particularly their accessibility by IFR and VFR aircraft, and ensure mitigations are put in place. One successful mitigation employed in other locations is altitude stratification of the SUA to ensure 24/7 access for those underlying airports. This option is preferred over a Letter of Agreement with air traffic control as pilots have no way of knowing that an agreement exists and thus cannot flight plan to an airport when access may be denied.

Another consideration is the unique geography and mountainous terrain located in the area under review. VFR pilots will generally fly in the valleys and those areas of lower terrain. Designing the SUA to follow the geography to allow VFR pilot's uninterrupted access to popular routes will reduce the chance of a mid-air collision. Mitigating the risk of a mid-air should be considered in the design phase of the airspace with considerable weight given to where civil aircraft historically fly. We believe a proactive review of VFR aircraft flight patterns in this area is necessary to achieve effective deconfliction of the airspace.

The airways located in the area of consideration are frequently utilized by general aviation aircraft. Notably, the FAA is not considering decommissioning conventional navigation aids or removing the airway structure in this part of the country due to general aviation's need to fly using the lower minimum en route altitudes afforded by an airway structure. The military's GPS interference testing is common in this region which further shows the necessity of ensuring aircraft have an alternative means of navigation besides GPS. The proponent should design their future SUA with the goal of limiting its impact on surrounding airways. Deconfliction between an airway and new SUA can be accomplished via lateral separation or altitude stratification. Altitude stratification should at least allow opposite direction traffic to fly using the airway, which the proposed 12,500' MOA floor allows. We encourage the USAF to not utilize a MOA floor lower than 12,500' in this area because of the frequent operations on these airways.

### **The USAF should release SUA no longer needed**

The USAF notes in their notice of intent that they will be releasing that SUA no longer needed as part of their mission. We are encouraged by this statement and believe this SUA Optimization Project affords many opportunities to do so. The draft EIS must provide additional details on how this will be accomplished and how the release of airspace will be meaningful. Raising the MOA floor from 300' to 500' offers limited benefit but we hope it is a first step in a larger reduction of SUA in this region.

One of our concerns not addressed by the initial documentation is regarding the airspace needs of surrounding bases, specifically those other than Holloman AFB, and if the USAF is adequately planning for their needs in parallel. Comprehensively addressing the regional SUA requirements can provide a variety of benefits for general and commercial aviation. For example, other bases and military branches may have their own SUA needs and could piggyback on this EIS and optimization project. Providing a more thorough analysis of the broader region could save the USAF time and money overall. We encourage the proponent to address the long-term needs and utilization of surrounding regional SUA as it may indicate additional MOAs are not needed.

### **Economic impact of general aviation in New Mexico**

Aviation is a vital element of New Mexico's economy. A 2009 New Mexico Airport System Plan Update found that the state's aviation industry supports \$3.1 billion in economic activity annually. According to this update, aviation supports over 48,000 jobs and \$1.3 billion in payroll. There are 60 public-owned, public-use airports in the state, serving more than 4,500 active pilots and 3,300 general aviation aircraft.

General aviation is vital to many aviation and non-aviation businesses in New Mexico, which use these aircraft to move personnel, equipment, and products. According to a 2006 Merge Global study, general aviation in New Mexico contributes \$761 million, or \$378 per capita, to the state's economy.

New Mexico is home to 21 charter flight companies, 21 airport repair stations, and eight flight schools operating 43 aircraft and providing 119 jobs. In addition, the state has 40 Fixed Base Operators and nine public benefit organizations that promote "air transportation for a cause" via general aviation aircraft. As an example, volunteer pilots with Angel Flight South Central have flown hundreds of missions and coordinated many hundreds more. San Juan College in Farmington, NM, is a member of the University Aviation Association.

### **Conclusion**

AOPA recognizes and fully supports the USAF's need to train as they fight and their need to do so economically. We are encouraged at the prospect of improving the airspace efficiency in this region for the military and general aviation, but implore the proponent to fully consider their impact as they shift and expand airspace boundaries. We look forward to the draft EIS and the additional details that come with it.

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.