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Mr. Allen Richmond
AFCEC/CZN
2261 Hughes Ave., Ste. 155
Lackland AFB, TX 78236-9853

Re: Public Scoping Meetings for the Proposed Relocation of 18th Aggressor Squadron from Eielson AFB to JBER and Rightsizing Remaining Overhead/Base Operating Support at EAFB.

Dear Mr. Richmond:

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, over 4,300 of whom reside in Alaska, submits the following comments in response to proposed relocation of the 18th Aggressor Squadron from Eielson Air Force Base (AFB) to Joint Base Elmendorf Richardson (JBER). There are a number of issues that need to be identified and analyzed in order to reach an appropriate decision with regard to the proposed relocation. AOPA encourages the United States Air Force (USAF) to perform due diligence while moving forward, to ensure general aviation's vital role in the state of Alaska is preserved.

Impact on civil use of Anchorage bowl airspace

In addition to the primary military airfields (Elmendorf AFB and Bryant AAF), JBER also hosts a hospital heliport and an airstrip at Sixmile Lake. Within a ten mile radius of Elmendorf's runway are: Merrill Field, the largest general aviation airport in the state; Lake Hood, the largest seaplane base in the world; and Anchorage International Airport (ANC) which is the second largest air cargo airport in the nation. Additionally, there are 21 other landing strips or float plane facilities. In contrast to any other state in the country, Alaska has a severe lack of road infrastructure to transport people, supplies and equipment. Consequently, aviation is relied on more heavily for routine transportation, which contributes to making this very busy airspace utilized by airlines, air taxis, business and government aircraft, and recreational users.

<u>Impact on Part 93 airspace usage</u>

Due to the congested nature of this area, FAA has established special Part 93 airspace segments that provide corridors to help segregate civil and military traffic, particularly in the area immediately west of JBER, where civil and military aircraft cross almost at right angles, enroute to their respective airport. While these VFR arrival and departure procedures provide physical separation, it is our understanding that they do not provide wake turbulence protection. A safety concern that needs to be evaluated is the degree to which additional traffic from the F-16 squadron might impact this situation. Today pilots will ask for, and frequently receive, a

deviation to either descend or climb through the Elmendorf Segment of the Part 93 airspace, allowing them to avoid having to fly across the open water at altitudes as low as 600 feet Mean Sea Level (MSL). To what extent would the increase of traffic from the F-16's displace civil aircraft into this portion of the airspace, and increase their exposure to wake turbulence from military aircraft overhead?

Cartee Airspace impact on Merrill Field

Merrill Field is less than two nautical miles (NM) from the end of Elmendorf Runway 34. At times when military aircraft are using Runway 34 at Elmendorf, a portion of the Merrill Segment has been designated as Cartee Airspace, excluding it for use by Merrill aircraft. AOPA suggests that as part of an Environmental Impact Statement (EIS) there would be an analysis indicating the extent to which the F-16 squadron, or other aircraft training with the squadron, would result in increased use of this airspace, and the resulting impact on Merrill Field traffic.

IFR access to Anchorage International

General aviation aircraft make use of the instrument approaches to ANC. We understand that capacity is already limited at ANC when the field is under Instrument Flight Rules (IFR), and depending on the specific condition, requiring the FAA to implement procedures to delay inbound aircraft enroute, or delay departures from Alaskan or other departure airports. Included in the capacity for ANC is consideration for IFR access to Elmendorf. It would be beneficial if the EIS included an analysis to determine what impact the addition of the F-16 squadron, and any other aircraft that might train with them, would have on IFR arrivals to ANC, and the economic impact of any resulting reduction in capacity.

Military Operations Area (MOA) impacts

Based on presentations at the scoping meetings, AOPA understands that if the F-16 squadron is relocated, the routine training that today takes place in the Joint Pacific Alaska Range Complex airspace close to Eielson, would be shifted to MOA closer to JBER. Specifically mentioned were the Sustina MOA, Fox MOA and Warning Area W-612 in the Gulf of Alaska. It is assumed that there are extra operating costs in the Gulf due to the need to station helicopters and/or ships as a safety provision, so that the majority of training would be focused on Susitna and Fox MOAs.

Susitna MOA

The Susitna MOA, northwest of Anchorage, is situated over the southern portion of Denali National Park. Since the time it was created, there has been a considerable increase in civil air traffic between Talkeetna and the Mount McKinley Massif, both to support seasonal mountain climbing operations and flight seeing activities. While the floor of the MOA is 10,000 feet MSL or 5,000 feet Above Ground Level (AGL), it is potentially in close proximity to civil mountain traffic. Government aircraft supporting the National Park Service also operate in the area. AOPA would like to see the impact of increased military traffic on the mountain flying operations considered in the analysis for this project.

The National Park Service has established sound-scape standards over Denali National Park since the original Susitna MOA was established. AOPA has and will continue to work with the

National Park Service and other aviation groups to examine ways we can reduce the sound impact on specific areas in the Park, in order to be good neighbors with the over 500,000 visitors that utilize the park annually. It is our understanding that part of the training the Aggressor Squadron performs in this airspace also includes joint training with F-22 and possibly other military aircraft. AOPA would suggest the USAF conduct an analysis of the sound impact of increased F-16 and other related training based on this proposed move to determine the impact on the soundscape of Denali National Park.

Reduced Yukon MOA Usage

If the F-16 squadron is relocated to JBER, and associated routine training shifted to MOAs south of the Alaska Range, the utilization of the Yukon MOAs should be greatly reduced. While they would still be needed for the estimated 12 week period during major force and smaller group exercises, it appears this usage would allow the use of Yukon 1 and 2 to be limited to major exercises only, and not tied up as they are today Monday-Friday 8 a.m. to 6 p.m. local. Yukon 3 and 4 similarly should be evaluated for major force exercise only use. This reduction may make it feasible to establish IFR airways into some of the communities which are currently without IFR access, such as Eagle and Chalkyitsik. The increase in access and safety for these communities should be quantified and included in the analysis.

Reduced Galena MOA Usage

Similar to the reduction in Yukon MOAs, an analysis of the Galena MOA utilization is suggested. The Air Force has no station at Galena so if F-16 training shifts south of the Alaska Range we would ask that the USAF evaluate the use of the Galena MOA to see if it is no longer needed for military training.

Scope of EIS Alternatives

The scope of the EIS to consider relocating the F-16 squadron from Eielson to JBER specifically includes mention of the "rightsizing remaining overhead/base operating support at Eielson AFB." Yet the two alternatives proposed to accomplish this purpose and need are very narrowly defined, and do not consider the broader activities in the region. The last decade has seen dramatic changes in the Arctic, specifically the retreat of sea-ice in the Arctic Ocean and Chukchi Sea to the point that shipping lanes are being considered. Exploration for offshore oil development was started last summer, and ports and other coastal infrastructure are currently under consideration. Infrastructure support will be needed in connection with any of these activities, including civil aviation to support the companies engaged in these activities. While the activities themselves may be largely performed by private sector organizations, government facilities to support search and rescue and other transportation infrastructure will be required.

In 2010 AOPA participated in the Arctic Aviation Experts Conference and the Arctic Civil Infrastructure Workshop, where these challenges were explored and discussed. Proceedings or presentations from these meetings will provide the EIS team with background information on these topics. The costs of building a major base or bases that would support aircraft capable of long range operations in the Arctic are immense. Currently, the nearest Coast Guard Base to support operations in the Arctic is located on Kodiak Island, about 450 NM south of Eielson

AFB. Additional scoping scenarios, taking these needs into account should be defined and included in this EIS given the emphasis on "rightsizing" Eielson AFB.

We appreciate the opportunity to comment on the proposed relocation of the 18th Aggressor Squadron from Eielson AFB to JBER and Rightsizing Remaining Overhead/Base Operating Support at EAFB.

Sincerely,

Tom George
Alaska Regional Manager

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i. Cartee Airspace: http://www.muni.org/Departments/merrill_field/Pages/LocalAirSpace.aspx
ii. Arctic Aviation Experts Conference: http://www.institutenorth.org/programs/arctic-advocacy-infrastructure/arctic-transportation/arctic-aviation-experts-conference/2010-conference/
iii. Arctic Civil Infrastructure Workshop: https://sites.google.com/a/alaska.edu/arctic-civil-infrastructure-workshop/