



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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October 2, 2007

Mr. Addison D. Davis, IV
Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health)
Public Affairs Office
U.S. Army Environmental Command
Building E4460, Attention: IMAE-PA
5179 Hoadley Road
Aberdeen Proving Ground, MD 21010-5401

Re: Notice of Availability of the Draft Programmatic Environmental Impact Statement (DPEIS) for Army Growth and Force Structure Realignment

Dear Mr. Davis:

The Aircraft Owners and Pilots Association (AOPA), representing more than 413,000 members, submits the following comments with regards to the Draft Programmatic Environmental Impact Statement (DPEIS) for Army Growth and Force Structure Realignment. AOPA objects to six of the seventeen installations being considered for growth or realignment by the Department of Army (DA). The need to expand or create new Special Use Airspace (SUA) at these six installations is unnecessary and unacceptable.

Considering the number of available options, AOPA contends that the most appropriate action will be for the DA to consider only those installations shown to have no greater than "Low" impact on the surrounding airspace. More than 60% of the installation options have no greater than a "Low" impact on the surrounding airspace. These eleven options will give the DA a "turn-key" installation with respect to airspace and ranges, and will not require the lengthy and expensive process of creating or expanding SUA in the area.

The AOPA opposes the following six installations being considered for growth or realignment: Fort Bliss, TX; Fort Bragg, NC; Fort Carson, CO; Fort Drum, NY; Fort Lewis, WA; and White Sands Missile Range, NM. Each of these six areas is located in high general aviation (GA) traffic areas. Increasing the SUA in these areas would have a significant adverse impact on the local and transient GA community. Any efforts to expand or create new SUA in these areas would be complicated and scrutinized by local pilot groups and AOPA.

AOPA appreciates the opportunity to comment on this matter. If there are any questions for AOPA, you can reach me at 301-695-2207.

Sincerely,

Pete Lehmann
Government Analyst
Air Traffic Services