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April 30, 2008

Mr. James W. Hostman
611 CES/CEVQP
10471 20th Street, Suite 302
Elmendorf AFB, AK 99506-2200

Re: Draft Environmental Assessment regarding creation of a Delta Military Operations Area

Dear Mr. Hostman:

The Aircraft Owners and Pilots Association (AOPA) represents more than 414,000 members nationwide, some 4,300 of which live in the state of Alaska. We are opposed to establishment of the Delta Military Operations Area (MOA) as proposed. While AOPA understands the military's training requirements, the exercises need to be conducted without impacting Instrument Flight Rules (IFR) access to Fairbanks and northern Alaska, as well as the Delta Junction and the Fort Greeley area.

The proposal to create a new Delta MOA removes the only corridor left that bisects the Pacific Alaska Airspace Complex, an area approximately 320 nautical miles across, and at least 100 nautical miles deep, covering some 60,780 square miles. The principle aviation impacts of this proposal are: (a) that it severs the IFR airways between Fairbanks, Delta Junction, Northway and Glennallen when active, and (b) it subjects Visual Flight Rules (VFR) traffic to increased exposure to high-speed military traffic along a heavily travelled corridor.

The USAF's Past Outreach Failed to Adequately Address the Impacts to GA

During the use of this airspace under a Temporary MOA authorization, the Air Force has promised to communicate the times of use, and the "work arounds" that are available for emergency, lifeguard and fire-fighting aircraft. While the Air Force stated it would post Notices to Airmen (Notams) 30 days in advance, no civil Notams were issued until much closer to airspace activation dates. The Notams that were distributed by the FAA were not complete and informative; in fact they referenced an International Civil Aviation Organization (ICAO) Notam which most pilots were unable to locate.

The Air Force has failed to communicate the full impact of their proposed action, specifically the loss of access to the IFR airway that runs along the proposed MOA. Briefing materials at public presentations failed even to depict the IFR airways on maps or cross section diagrams.

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The Delta MOAs Would Adversely Impact All Segments of Civil Aviation

The loss of the IFR airways proposed by this action is a significant impact in that they reduce access between communities to aircraft that operate under IFR rules.

This potentially limits commuter airlines from developing a schedule for IFR service out of Delta Junction or Allen Army Airbase that might need to connect in a timely fashion with mainline carrier flights in Fairbanks or Anchorage.

The State of Alaska and several oil companies are aggressively pursuing construction of a gas pipeline. The most likely route for the line is through the proposed MOA corridor. As soon as this summer at least one oil company expects a significant increase of aviation activity along the corridor between Fairbanks and Northway. While the Air Force has made some accommodation for high altitude traffic operating from the west coast into Fairbanks, there are no provisions for single and multi-engine aircraft, other than emergency, lifeguard and firefighting traffic, that operate in the low-altitude enroute structure to transit the airspace IFR.

While the extent of the proposed Delta MOA airspace is relatively small, the cumulative impact of converting this corridor is significant. The corridor was left outside the MOA complex when the larger airspace package was developed in the mid-1990's. Conversion of this airspace into a permanent, part-time MOA must be put in perspective of the entire MOA complex, an area larger than the entire state of New York.

AOPA had proposed that the proposed MOA be split at 10,000' with civil access for IFR traffic having first priority in the lower segment. Until such time as the FAA has the ability to provide real-time coordination of traffic through the airspace, the floor of the MOA airspace should be increased, leaving airways open to civil traffic, to ensure access for low altitude IFR traffic.

Thank you for the opportunity to comment on this proposed action.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Lehmann". The signature is stylized with a large, sweeping initial "P" and a long horizontal stroke at the end.

Pete Lehmann
Manager
Air Traffic Services