



421 Aviation Way  
Frederick, Maryland 21701

T. 301-695-2000  
F. 301-695-2375

[www.aopa.org](http://www.aopa.org)

November 25, 2008

Mr. Clark Desing  
Federal Aviation Administration  
ATTN: Alaska Flight Service Information Area Group, AAL-530  
222 West 7<sup>th</sup> Avenue, #14  
Anchorage, AK 99513-7687

**Re: Delta Temporary Military Operations Area Proposal Aeronautical Study No. 08-AAL-44NR**

Dear Mr. Desing:

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 members nationwide, 4,300 of which reside in the state of Alaska, oppose the establishment of Temporary Military Operations Areas (TMOAs) in the Delta Junction. While we support military training, the exercises need to be conducted without the loss of Instrument Flight Rules (IFR) access.

**Delta TMOA Impacts V-444 Access and Limits IFR Traffic**

Alaska, at a size of approximately one-fifth of the rest of the nation, relies largely on air travel, with over 200 communities that count on aviation as their sole means of year-round access. The current proposal would impact the only IFR Victor airway, V-444 that connects northern Alaska directly with Delta Junction, and points south and east. The airway is used not only by local traffic within Alaska, but is the primary route connecting Fairbanks International Airport, the second largest airport in the state, with destinations east. Users include piston powered general aviation aircraft that fly from the contiguous states and Canada into Fairbanks, as well as corporate turbine aircraft which operate to points throughout North America.

The only alternative IFR route would require a detour of nearly 390 nautical miles, with a minimum enroute altitude (MEA) of 10,000 feet, and requires two crossings of the Alaska Range. This is not practical or safe for many general aviation aircraft and would eliminate the use of 3 en route altitudes in each direction that are currently in use with V-444's 5,000 feet msl MEA.

Last year the Federal Aviation Administration (FAA) granted the military's proposed airspace request but made allowances for certain types of air traffic, such as medivac flights, and fire fighting aircraft. While exemptions for emergency flights are helpful, it still closes V-444 and interferes with basic airspace access and commerce. Given the initial studies launched recently to build a natural gas pipeline along this route, it is reasonable to anticipate increased IFR activity along this route this next season, as well as in years to come.

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**FAA Must Address IFR Impacts Should Delta TMOA become Permanent**

The Air Force has indicated that their goal is to make the Delta TMOA airspace permanent in the near future. Our understanding is that the airspace would still be activated only for major flying exercises. However, the military intends to increase the amount of use for the MOA complex. If the Air Force decides to move forward in making the Delta TMOA permanent, the FAA must consider and mitigate the impacts on the only IFR airway that connects Fairbanks and northern Alaska directly with western Canada and the rest of the United States.

**AOPA Recommendations for Mitigation**

In light of the additional Air Force radar and improved radio communication between IFR aircraft and Anchorage Center, the FAA should establish procedures to avoid complete closure of V-444. AOPA recommends the airspace be separated into a low and high MOA along the airway that would allow the low MOA (10,000 feet and below) to remain available for use. With the additional surveillance and communication tools provided by the military, AOPA contends that procedures must be established for real-time coordination of this airspace that accommodates military training without adversely impacting civil access.

AOPA and the Alaskan aviation community have actively worked with the FAA and Air Force to explore creative solutions for all users of this airspace. From those discussions, innovations such as the Special Use Airspace Information Service (SUAIS) have greatly increased situational awareness for Visual Flight Rules (VFR) traffic operating in the eastern Alaska MOA complex. A similar effort is needed to continue uninterrupted access for IFR traffic, while supporting the military's need to train.

AOPA appreciates the opportunity to provide input on the impacts associated with this proposal to create temporary MOAs and looks forward to further coordination efforts between the Alaska aviation community, the FAA and the Air Force to address these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pete Lehmann', with a long horizontal line extending to the right.

Pete Lehmann  
Manager  
Air Traffic Services