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January 20, 2009

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

Dear Mr. Hostman:

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

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 the Delta Military Operations Areas (MOAs). The Finding of No Significant Impact (FONSI) that the United States Air Force (USAF) arrived at in the draft Environmental Assessment (EA) does not take into consideration key aspects of transportation the Alaskan public relies on. While we support military training, the exercises need to be conducted without the loss of Instrument Flight Rules (IFR) access.

The proposal to create a new Delta MOA removes the only airway remaining that transitions through the Pacific Alaska Airspace Complex, an area approximately 320 nautical miles across and at least 100 nautical miles deep, covering some 34,863 square miles. The principle impacts of this proposal to general aviation are:

- The severing of the IFR airways between Fairbanks, Delta Junction, Northway and Glennallen. The USAF suggested mitigation of civil IFR traffic cancelling their IFR flight plan, and continuing through the active MOA under VFR is not viable due to the significant impacts to safety.
- Visual Flight Rules (VFR) traffic increased exposure to high-speed military traffic along a heavily travelled route.

Delta MOA 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-around access. The size of the proposed Delta MOA is approximately 3.5 million acres in size, or slightly larger than the state of Connecticut. The impact of precluding IFR access across an area this size is significant enough in its own right, however when the Delta MOA is planned to be activated, it becomes contiguous with the remainder of eastern Alaska MOA complex, an area in size of approximately 22.3 million acres, an area almost the size of the state of Indiana. Because IFR access is not allowed in MOA's when active, this creates a significant block to civil access to very large areas, which are not practical to circumnavigate by most general aviation aircraft.

The draft EA claims the impact to civil aviation would be insignificant by citing an annual usage is only 3.1% of total annual hours. This percentage is based on total number of hours in a year, and does not take into consideration the time of day the MOAs will be activated. The USAF plans to activate the MOAs during the daylight hours of normal work weeks. In Alaska, these daylight hours are highly valued by the general aviation community due to the reduced duration, compared to that of the lower 48 states. In addressing the impact for normal business activities, it is more appropriate to take into account what percent of the business day the airway will be closed during the times the major flying exercises are active. With up to five hour activation periods per day, during week days only, over a typical two week exercise, this represents a restriction from access of 50 hours out of a typical 80 hour work period, or 63% of the period.

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 airway routes in each direction, that are currently in use with V-444's 5,000 feet msl MEA.

Delta MOA Impact to VFR Aircraft

While VFR aircraft are permitted to fly in active MOAs, the corridor of airspace the Delta MOA proposal attempts to fill was specifically designed to provide airspace free from high speed military maneuvers and tactics for civil traffic along this well established travel corridor. These VFR corridors are low level routes along automobile highways that were designed to provide a safe haven for slow aircraft that either had no radios, or otherwise wished to deconflict by staying below the "fast movers" that used the Buffalo and Birch MOAs.

During informal discussions the USAF has wanted to avoid significant re-routing around the Delta MOA should cancel IFR and proceed VFR using the VFR corridors. This type of operation creates a potential reduction in safety for operators and passengers alike, and may encourage pilots to continue VFR into poor weather conditions. AOPA has always encouraged members to avoid flying in such conditions. Furthermore, AOPA and the Federal Aviation Administration (FAA) have made many efforts to reduce the number of controlled flight into terrain (CFIT) accidents over the past decade, and would ask that the USAF remove this potential mitigation option.

Delta MOA Economic Impacts

The draft EA indicated that based on 2007 operations during the exercise periods, the proposed airspace will displace no more than one or two general aviation flights per day and that one or two "commercial" flights would have to be sent south of the 63 degree high altitude corridor. There is no mention or apparent consideration of commercial or corporate aircraft that operate in the low altitude structure along this route. Current uses today include oil pipeline transportation, mineral exploration support, and construction

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management and support. The needs for aviation support to prepare for and construct a natural gas pipeline, or rail road along this corridor doesn't appear to have been taken into consideration in the analysis of potential economic impact. Furthermore, the study only takes into account IFR traffic data, and does not take into consideration VFR traffic that do not participate in radar services.

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 civilian 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 the proposed 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