July 23, 2010

Ms. Linda DeVine
HQ ACC/ATPS
129 Ansrews St. Room 337
Langley AFB, VA 23665

RE: Final Environmental Impact Statement (FEIS) for the Shaw Air Force Base Airspace Training Initiative, Shaw Air Force Base (AFB), South Carolina

Ms. DeVine,

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 members nationwide, submits the following comments in response to the FEIS for the Airspace Training Initiative at Shaw AFB. AOPA is appreciative of the Air Force’s efforts to mitigate impacts on general aviation with the changes incorporated in the Mitigated Proposed Action. However, AOPA remains concerned with the addition of the Bulldog C & E Military Operations Areas (MOA) because of the impact on Instrument Flight Rules (IFR) operations and the compression of Visual Flight Rules (VFR) traffic when the increased ceiling of the Poinsett MOA is combined with the Gamecock E MOA. Based on the range of options, alternative B largely mitigates AOPA’s concerns and with additional modifications, could fully address the impacts of the proposed airspace initiative on general aviation.

The addition of the Bulldog C & E MOAs under the Mitigated Proposed Action will have a major impact on two public-use airports, two private-use airports, seven instrument approach procedures, one Victor airway, and one T-route. Additionally, the establishment of these two MOAs will restrict access for Instrument Flight Rules (IFR) traffic any time either MOA is active.

Alternative B mitigates some of the airspace concerns associated with the Mitigated Proposed Action, but additional modifications are needed to fully address the impacts on the general aviation user community. The expansion of the Bulldog B MOA to 3,000 feet MSL versus the original planned 500 feet AGL reduces the impact to VFR traffic operating in northeast Georgia. However, there remains a significant impact to IFR operations along Victor Airway V70 and Terminal Route T209. Given the fact there are thousands of square miles of low altitude airspace already utilized by Shaw AFB in the Bulldog A and Gamecock C MOAs, and that aircraft will not be dropping flares or chaff below 5,000 feet, there appears to be a lack of justification for requesting a floor of 3,000 feet. To allow access to V70 and T209, AOPA recommends the floor of Bulldog B MOA be limited to 7,000 feet MSL.

Raising the ceiling of the Poinsett MOA under Alternative B is also a concern if the proposed Gamecock E MOA is activated simultaneously. To address concerns with VFR traffic compression and access to V3 and V 157, AOPA recommends that Shaw AFB institute operational procedures that would restrict the simultaneous use of Poinsett and Gamecock E MOAs.

Additionally, AOPA believes a lower floor as proposed for the Gamecock D MOA is unnecessary considering the current air traffic control (ATC) agreement with Shaw AFB to not operate lower than 12,000 feet MSL. As stated in the FEIS, the alternative was not carried forward because the maneuvering airspace would continue to be constrained. Due to a demonstrated lack of operational need, lowering the floor of the Gamecock D MOA to 8,000 MSL is unwarranted.
Ms. Linda DeVine  
Page 2  
July 22, 2010

Thank you for the opportunity to provide comments on the proposal. Although Alternative B remains our preferred choice, we appreciate the Air Force’s efforts to address general aviation concerns with the Mitigated Proposed Action and look forward to working with the Air Force in an effort to mitigate the remaining safety and access issues related to this initiative.

Sincerely,

Tom Kramer  
Manager  
Air Traffic Services