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Ms. Edith Parish
Manager, Airspace, Regulations, and ATC Procedures
US Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue, SE
West Building Ground Floor, Room W12-140
Washington, D.C. 20590

Re: FAA Docket No. FAA-2010-1146, Airspace Docket No. 10-ASO-25: Proposed Amendment of Restricted Areas R-2907A, R-2907B, and R-2910

Ms. Parish:

The Aircraft Owners and Pilots Association (AOPA), representing more than 410,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) Notice of Proposed Rulemaking to amend restricted areas R-2907A, R-2907B and R-2910 north of Orlando, FL. This airspace action has the potential to severely impact hundreds of pilots in the central Florida region due to its size and location; bisecting the state of Florida and abutting Class B airspace. With minor adjustments, these impacts can be mitigated while still accomplishing the Navy's goal of realistic training in current tactics.

Chartered times of use appear excessive

With a lack of real-time Special Use Airspace (SUA) activation data, general aviation pilots are forced to rely primarily on charted times of use for flight planning. We appreciate the US Navy's offer to return unused airspace to the National Airspace System when it is not needed for a specific training mission. However, this information does not reach most general aviation pilots and therefore does not mitigate the impact of 20 charted hours of use per day. At a time when we are all working to be good stewards of the national airspace system and its finite resources, we would ask that the times of use be reduced to only what is needed for training purposes.

According to the Supplementary Environmental Impact Statement (SEIS) published June 2010, the US Navy plans to use the Pinecastle SUA complex for both Unit Level Training (ULT) and Major Training Exercises (MTE). From the SEIS, "ULT is considered to be the normal mode of operation at the Range and occurs approximately 170 days out of the 240 available Range days per year." AOPA questions the need to chart the airspace for 7,300 hours each year when the Navy only utilizes it for 4,080 hours. Even with the addition of MTEs, actual airspace usage amounts to 58% of charted times of use. Compounding this concern is the Navy's ability to issue a Notice to Airmen, activating the airspace outside of charted times of use further increasing their flexibility.

We recognize and understand the need for flexibility in scheduling and executing training missions. However, without real-time special use airspace information, flexibility for the US Navy comes at the expense of efficiency and flexibility for general aviation and other national airspace users. AOPA requests that the FAA amend the charted times of use to more accurately depict the actual usage of this airspace.

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Significant barrier to general aviation

Currently, the Pinecastle SUA complex has two narrow corridors permitting the transition of general aviation traffic west/east. The proposed airspace action will link the three restricted airspace areas creating, in effect, a 42 nm wall separating the east and west portions of Florida. This will cause a significant, detrimental impact on general aviation and flight training in the area. These locally based pilots along with thousands of transient pilots from flight schools and airports to the east and west will face detours of 20 nm or more if this rulemaking is implemented as proposed. The proposed R-2907B represents an opportunity to preserve one of these corridors. Raising the floor of this proposed sector just 1,000 feet would permit the transition of west/east traffic, significantly alleviating the impact of the expanded SUA.

While the impact to local operators is significant and avoidable, an even more onerous impact threatens the efficient operation of non-electrical system equipped aircraft. Because R-2910 effectively abuts the northern portion of the Orlando International Airport (MCO) Mode C veil, pilots are forced to choose between climbing to at least 6,500 feet or deviating as much as 100 nm to avoid restricted airspace and the MCO Mode C veil. Eastbound pilots would be forced to climb as high as 7,500 feet to comply with FAA regulations. Such a lengthy climb will add unnecessary time, expense, and aircraft wear and tear.

The impact to non-electrical system equipped aircraft is easily mitigated by moving the southernmost boundary of R-2910 five miles north. This will open a corridor between R-2910 and the MCO Mode C veil permitting general aviation, including non-electrical system equipped aircraft to transition west/east without a significant deviation or unreasonable climb requirement.

As an additional mitigation measure, AOPA requests that the FAA print the communications frequency for the controlling agency directly on the chart, adjacent to the SUA. Having this information readily visible immediately near the SUA makes it easier for general aviation pilots to obtain airspace status while en route.

The potential to negatively impact general aviation in the area is great with this proposal. Fortunately, with minor adjustments including charting the communication frequencies, adjusting charted times of use to more accurately depict actual use, raising the floor of R-2907B and shifting the southernmost boundary of R-2910 5 miles north, these impacts can be largely mitigated. AOPA appreciates the opportunity to provide comments on the proposed rulemaking amending the Pinecastle SUA complex.

Sincerely,



Tom Kramer
Manager
Air Traffic Services