



421 Aviation Way
Frederick, Maryland 21701

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

www.aopa.org

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ALCOM Public Affairs
9480 Pease Avenue
Suite 120
JBER, AK 99506

Re: Notice of Intent to prepare and Environmental Impact Statement for the modernization and enhancement of ranges, airspace and training areas in the Joint Pacific Alaska Range Complex

Dear Sir or Madam:

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the modernization and enhancement of ranges, airspace and training areas in the Joint Pacific Alaska Range Complex (JPARC). The large scale of this initiative will result in substantial impacts on general aviation operations in the affected area. AOPA supports the United States (US) military and their need to train realistically and submits the following comments in an effort to offer alternatives that will meet the need of the US military while reducing the impact on general aviation.

Opportunity for ad hoc user group

As the largest Special Use Airspace (SUA) area in the United States, the JPARC initiative is unique and necessitates an original, out-of-the-box approach to mitigating the impacts on general aviation and other national airspace users. The US military must consider all possible solutions to minimizing the aeronautical impacts of this proposal. The JPARC initiative represents an opportunity for early engagement with the user community and AOPA would like to see an ad-hoc group established consisting of airspace stakeholders, the Department of Defense (DoD), and Federal Aviation Administration (FAA). This group would meet informally to discuss the military's goals, educate one another on the concerns and impacts of the proposal, and develop a solution that meets the military's needs without unnecessary impacts on general aviation and other civil airspace users. Ideally, this group would have convened as early in the concept phase as possible but could still be utilized as an excellent opportunity for engagement and collaboration. AOPA contends that early engagement at the concept phase of an initiative will reduce the overall time spent during the National Environmental Policy Act (NEPA) and aeronautical process and would ultimately lead to a more desirable and mutually agreeable solution for all parties.

Insufficient comment period

AOPA is disappointed that our December 15, 2010 request to extend the public scoping comment period was denied. While we recognize that the deadline exceeded the minimum requirement of NEPA regulations, it does not meet the spirit or intent of the regulation which is to encourage the submission of substantive comments. AOPA questions how the general public can be expected to attend a public meeting, research the proposal, formulate, and submit substantive comments in as little as 9 days. We also recognize there will be future opportunity for public comment. However, early input is truly the key to working collaboratively and striking a balance in establishing needed airspace for military training and readiness while mitigating the impact the proposal has on other airspace users.

Special Use Airspace Information Service

The creation of the Special Use Airspace Information Service (SUAIS) in the 1990's for portions of the JPARC has had a very positive impact on Visual Flight Rules (VFR) usage of this airspace complex that extends across an area over 300 miles wide. In areas where there is adequate communication and surveillance, this has greatly improved the situational awareness for both civil and military airspace users. Recently, pilots have reported that in the eastern portions of the complex, communications are not adequate and users are experiencing difficulties with this shared airspace. An evaluation of this situation is required to provide adequate SUAIS in the existing airspace.

Instrument Flight Rules (IFR) access is needed to access the communities underneath and around this mega-complex since aircraft provide the only year-around means of transportation to these communities. Real-time coordination for IFR use of Military Operations Areas (MOA) is necessary to improve access and safety into these remote locations served almost exclusively by air transportation.

AOPA urges the expansion of the SUAIS program to include all SUA within the JPARC complex. To be most successful, AOPA urges full integration of Air Force and Army participation in the Special Use Airspace Information Service. This would help to avoid confusion regarding who to contact in the various segments of the airspace complex.

Remotely Piloted Aircraft/Unmanned Aerial Vehicle corridors

The Notice of Intent announcement in the December 8, 2011 Federal Register provides a brief mention of consideration for establishing restricted airspace corridors for the purpose of navigating Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicles (UAV) from military airfields into various restricted airspace areas. The FAA has consistently gone on record denying the addition of new restricted airspace areas for the sole purpose of RPA/UAV operations. Restricted airspace is for containment of hazardous operations. En-route RPA/UAV flights transitioning between an Air Force base and existing restricted airspace is not a hazardous operation. The proposed establishment of restricted airspace corridors for this purpose is an attempt to circumnavigate the RPAs/UAVs inability to see-and-avoid participating traffic. AOPA cannot support an expansion of the accepted uses of restricted airspace when other, less drastic options such as ground observation and chase planes remain available.

Joint Combined Arms Live Fire (JCALF)

The proposed restricted area for the Joint Combined Arms Live Fire (JCALF) should have been anticipated during the EIS that concluded in June 2006. At the time, the US military assured stakeholders that no restricted airspace would be needed to protect the planned improvements to ground infrastructure. Further restrictions to airspace in this VFR corridor are not acceptable due to the combination of terrain, weather, and existing restricted airspaces that limit civil aviation access in the area. Further analysis is needed to evaluate alternative means of accommodating military training objectives relative to this complex that do not require restricted airspace.

Economic impact of civil aviation in Alaska

According to *The Economic Contribution of the Alaska Aviation Industry to Alaska's Economy*, Northern Economics, Inc., the aviation industry in Alaska contributes \$3.5 billion, or approximately 8%, of the gross state product. The fact that this is almost 40% greater than the industry's role in the national economy demonstrates the importance of the aviation industry to Alaska's economy. An estimated 47,000 jobs are directly and indirectly related to aviation in the state of Alaska.

In addition, many communities in Alaska are not connected to the national highway system and depend on the aviation industry for movements of goods and people. The average number of enplanements per capita for off-road communities in Alaska is between eight and thirty times higher than in comparable communities in western rural states. Alaskans tend to rely on air freight 39 times more than comparable communities according to a 2009 study published by the Alaska Department of Transportation.

Summary

The JPARC initiative represents a tremendous opportunity for stakeholder education and engagement. The formation of an informal ad-hoc user group should be initiated to discuss the proposal and jointly develop aeronautical impact mitigation strategies. User engagement is a key to the success of this type of initiative and limiting the quantity and quality of scoping comments received by not extending the comment period deadline is counterproductive.

In addition, the SUAIS is a proven-effective system to reduce the impact on general aviation by providing SUA status information and consideration must be given to expanding this program. AOPA cannot support an expansion on the use of new restricted airspace for UAV transitions and instead urges the DoD to consider other means of mitigation the regulatory requirement of see and avoid. Further analysis is needed to evaluate alternate ways of accommodating the military's training objectives that do not require additional restricted airspace over the Battle Area Complex. Finally, the DEIS must evaluate the full scope of economic impacts on the general aviation industry caused by this initiative.

We appreciate the opportunity to submit comments on the scope of the upcoming EIS for the Joint Pacific Alaska Range Complex and look forward to working with the DoD on a solution that equitably accommodates both the military's need for realistic training, and the needs of the general aviation and civil airspace communities.

Sincerely,

A handwritten signature in black ink that reads "Tom Kramer". The signature is written in a cursive, slightly slanted style.

Tom Kramer
Manager
Air Traffic Services