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March 9, 2011

Mr. John Warner
Manager, Operations Support Group
AJV-W2, Western Service Center
Air Traffic Organization
Federal Aviation Administration
1601 Lind Avenue
Renton, WA 98057

Re: Proposed Modification of the Salt Lake City, UT Class B Airspace Area

Mr. Warner,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) proposed modification of the Salt Lake City, UT (SLC) Class B airspace area. The proposed increase to the ceiling over SLC provides no clear operational or safety benefit for any specific airspace user but will have a detrimental impact on general aviation safety and efficiency. In addition, AOPA is considered with and urges the FAA to consider the adverse impacts to Visual Flight Rules (VFR) access in the vicinity of SLC that would result from the proposed changes.

Detrimental impact of increased ceiling height
AOPA opposes the vertical extension of Salt Lake City's Class B airspace from 10,000 feet to 12,000 feet without mitigating the impacts upon VFR operations. The FAA stated that the intended purpose of the increased ceiling height is to better contain instrument departures and to reduce turbojet aircraft exposure to uncontrolled VFR aircraft for long periods of time. The FAA presented figures during the informal airspace meetings that showed approximately 75-79% of all VFR traffic overflying the Salt Lake City Class B airspace area utilized two-way radio communication with Air Traffic Control (ATC), and no actual mid-air collision or conflict resolution data was provided. While the proposal may contain greater portions of some instrument procedures, vertical extension of the Salt Lake Class B will allow more Instrument Flight Rules (IFR) traffic to exit the side of the controlled airspace. This is in direct contradiction to FAA order 7210.3, section 11-1-5 guidelines which state aircraft should enter/exit the top of Class B instead of the side of Class B.

Even a modest increase to the ceiling height of Salt Lake City will result in a reduction in the number of general aviation traffic that is able to transition above the Class B airspace. This increase will have the detrimental effect of forcing many pilots to fly at lower altitudes with less efficient routing and maneuver at lower altitudes in mountainous terrain in order to transition around and through Class B to access unrestricted airspace to the west.

VFR transitions
Given the unique configuration of Salt Lake City Class B and the surrounding terrain, it is imperative that general aviation pilots have as many alternatives as possible to transit through, over, and near the Class B airspace. AOPA requests that the FAA consider all available means of accommodating general aviation traffic through the establishment of T-routes, VFR transitions, and VFR flyways. Through collaborative efforts with airspace users, the FAA can develop and implement transition options for general aviation.

VFR Operations east of Ogden
Further reductions in the proposed Class B airspace to the northeast over the area of Francis Peak are warranted. This sector of the proposed Class B airspace should be no lower than 10,500 feet. FAA's request for a floor of 10,000 feet is not justified considering the height of the terrain is near 10,000 feet, FAA's minimum vectoring altitude for this area is 10,600 feet and Instrument Flight Rules aircraft operating between 10,000 and 12,000 feet in this area would exit the side of the Class B airspace contrary to FAA order 7210.3.

We appreciate the opportunity to submit comments on the proposed modifications to Salt Lake City's Class B airspace area.

Sincerely,

Tom Kramer

Tom Kramer
Manager, Air Traffic Services