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HQ ACC/A7PS
129 Andrews St., Ste 122
Langley, AFB, VA 23665-2769
ATTN: Ms. Linda DeVine

Re: White Elk Military Operations Area Final Environmental Impact Statement

Ms. DeVine,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the United States Air Force's (USAF) Final Environmental Impact Statement (FEIS) for the White Elk Military operations Area (MOA) near Hill Air Force Base, UT. AOPA appreciates the mitigation efforts of the USAF to address potential impacts to soaring operations in the Great Basin area through scheduling flexibility. We remain concerned with impacts on Victor V-269 due to a lack of Instrument Flight Rules (IFR) altitudes during times of (MOA) activation.

The proposed boundaries of the White Elk MOA have the potential to impact soaring operations in the Great Basin near Ely, NV. As documented in the FEIS, this area offers ideal soaring conditions and is home to a week-long soaring enthusiast's event, "Glider Week." We appreciate the USAF's flexibility in agreeing to alter scheduled times of use surrounding glider activities in the Great Basin to mitigate the concerns of glider pilots.

As proposed, the White Elk MOA will impact V-269 north of the Ely Very High Frequency Omnidirectional Range VOR. The Minimum Enroute Altitude along this portion of V-269 is 13,000 feet MSL. The proposed 14,000 foot Mean Sea Level (MSL) floor of the White Elk MOA will render V-269 unavailable for southbound IFR flights on the Victor airway anytime the MOA is activated. AOPA requests that a Letter of Agreement be established with the appropriate Air Traffic Control facility to facilitate both north and southbound IFR operations on V-269 during White Elk MOA activation. If such an agreement cannot be accommodated, AOPA requests that the USAF raise the proposed floor of the White Elk MOA to a minimum of 14,500 feet MSL to permit both north and southbound utilization of V-269 by IFR aircraft during periods of MOA activation.

AOPA appreciates the scheduling flexibility of the USAF to accommodate soaring operations which has mitigated concerns of the soaring community. With a Letter of Agreement or slight modification to the White Elk MOA floor, the USAF could mitigate the remaining concern of general aviation pilots. We appreciate the opportunity to submit comments on the Final Environmental Impact Statement for the White Elk Military Operations Area.

Sincerely,

Tom Kramer
Manager, Air Traffic Services