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Naval Facilities Engineering Command Southwest
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Re: Fallon Range Training Complex Modernization EIS Public Scoping Comments

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submit the following comments in response to the scope of the Environmental Impact Statement (EIS) being prepared as part of the Fallon Range Training Complex (FRTC) Modernization in Nevada. We appreciate the opportunity to provide feedback on behalf of the thousands of general aviation pilots who fly in that airspace. AOPA understands and supports the needs of the Navy and the Department of Defense (DoD) to train; however, we are concerned with the impacts that this significant expansion of Restricted Area and Military Operations Area (MOA) airspace will have on local and transient Visual Flight Rule (VFR) and Instrument Flight Rule (IFR) aircraft.

Large Special Use Airspace (SUA) Complexes Impact on General Aviation

The proliferation of large contiguous Special Use Airspace (SUA) complexes is posing a threat to the overall utility of the National Airspace System (NAS). Large areas of SUA can create substantial barriers to the freedom of movement from one area to another. These complexes, like the recent proposals at Twenty-nine Palms, Powder River, Volk, and JPARC, deserve additional scrutiny based on the barriers they can create when activated in whole. The airspace surrounding the FRTC is already congested with large SUA complexes, such as the NTTR and the Air Combat Command Salt Lake complex. The establishment of these areas must be scrutinized for national, regional, and local impacts.

General aviation is a primary means of travel, business, medical evacuation, and access, among others, for many people in Nevada. The SUA complex spans nearly across the entire state which, when activated, can result in significant delays for IFR general aviation traffic. Given the SUA's vertical dimensions, aircraft cannot fly over these MOAs and must instead fly around the complex. The need to circumvent this airspace increases fuel requirements and flight time. The proponent should evaluate the opportunity to provide IFR aircraft pathways through this airspace when it is active.

Times of Use

The existing FRTC SUA has scheduled times of activation, but can also be activated "other times by NOTAM." Not setting a time limit with the associated NOTAM can put pilots in the position of

finding out mid-air that the airspace is active, if it becomes activated after their departure. Failing to provide pilots advanced notice of activation impacts their ability to adequately flight plan. Modern general aviation aircraft can have over six hours of fuel endurance; however, having to deal with a long reroute can lead to issues of the pilot not having enough fuel and being forced to divert for fuel. At least six hours' notice is necessary to assist pilots with their flight planning and to help them avoid costly reroutes or the need for fuel diversions. The times of use for the existing SUA should be changed to "...as published by NOTAM issued 6 hours in advance of area activation" and all new SUA should utilize that same format.

IFR Aircraft

The proponent should consider the impact the expansion of SUA in this area will have on transient IFR aircraft. Many aircraft will be forced to fly over 100 NMs to circumvent the airspace. Although this expansion does not appear to impact aircraft on published routes, many aircraft flying off-route, point-to-point RNAV will be adversely affected. In 2014, an estimated 3.7 million general aviation IFR flight plans were filed with a cruising altitude below FL180. Of these flights, only half filed a published airway as part of their route and, for those that did, only 10% flew that published airway. It is evident that flying point-to-point has become the predominant form of navigation for general aviation and these flight profiles need to be considered.

Any new or expanded Restricted Areas must be charted on applicable instrument approach procedures. The proposed Restricted Area R-4814 comes close to the final approach course at Derby Field Airport (KLOL), therefore increasing pilot's situational awareness is important. The instrument approach procedures into KLOL should remain available when the weather is IFR regardless of the SUA that is active at FRTC.

The Eureka Airport (K05U) will be heavily impacted by the expanded Zircon, Diamond, and Duckwater MOAs. Pilots flying to this airport may experience significantly increased flight lengths if arriving from the west. A Letter of Agreement (LOA) should be established with Salt Lake City ARTCC that ensures full access to K05U is maintained in IFR conditions.

VFR Aircraft

The increase in Restricted Area within the FRTC will lead to increased circumnavigation and greater expense for pilots. Pilots have come to rely on the MOA and Restricted Area exclusion areas being available to transit the large mass of SUA. It is not clear from the description of the proposed airspace modifications if these areas are to be retained. The proponent should continue to provide general aviation a protected and approved route through the SUA complex regardless of what airspace is active.

AOPA believes this mitigation should be expanded equally with the expansion of SUA and, at the very least, sustained. For example, the east-west route should be continued to K05U through the new MOAs. A new north-south exclusion area route, such as from Mina VORTAC (MVA) to Battle Mountain VORTAC (BAM), should be considered given the amount of VFR traffic that would benefit from this route. This new route would also assist with predictability for see-and-avoid and mid-air collision avoidance.

To assist pilots with transiting the Restricted Area and MOA exclusion areas safely and accurately, the proponent should work with the FAA to create GPS VFR waypoints at key points along the

routes. The charting of VFR waypoints will assist pilots unfamiliar with the area safely navigate through the expanded SUA complex.

Reno MOA Expansion

The airspace proposal states Reno MOA's floor altitude would be lowered from 13,000 feet to 1,200 feet AGL. Lowering the altitude floor in this area will remove the opportunity for IFR aircraft flying point-to-point to duck under the MOA while it is active. The proponent should modify their request to allow cardinal altitudes to be utilized at or above the minimum IFR altitude in this area. This MOA also overlies the Smoke Creek and Black Rock Desert which are popular sightseeing areas for pilots. Pilots may feel less comfortable conducting sightseeing flights and loitering in this area should the MOA be lowered to 1,200 feet AGL. The FAA states in JO 7400.2 that the "SUA should be located to impose minimum impact on nonparticipating aircraft and ATC operations." AOPA contends that lowering the floor altitude over this popular VFR area would not be in keeping with that FAA requirement.

Outreach

The airspace proponent should engage in robust outreach with local pilot groups, such as the Southern California Airspace Users Working Group, state pilot groups, national pilot associations, nearby airports, and local fixed base operators to gather their input on what the impact will be of the FRTC Modernization. AOPA stands ready to support the military proponent's outreach efforts as we believe this proposal warrants special distribution.

Conclusion

AOPA supports the Navy, the DoD, and their mission to support the national defense. We believe these requirements can be met in a manner that will not cause an undue negative effect on general aviation. We appreciate you incorporating our recommendations as the EIS is developed and the airspace proposal finalized as they will help mitigate FRTC's negative impact on general aviation. Thank you for reviewing our comment on this important issue. Please feel free to contact me at 202-509-9515 if you have any questions.

Sincerely,



Rune Duke
Director, Airspace and Air Traffic

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members and establish, maintain and articulate positions of leadership to promote the economy, safety, utility and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.