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December 19, 2022

U.S. Department of Transportation
Docket Operations
1200 New Jersey Avenue SE
West Building Ground Floor
Room W12-140
Washington, DC 20590

RE: FAA Docket No. FAA-2022-0999; Airspace Docket No. 22-AWA-2 - Proposed Amendment of Class C Airspace around Chicago Midway International Airport

To Whom it May Concern,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submits the following comments in response to the proposed modifications to the Class C airspace around Chicago Midway International Airport (MDW). The proposed modifications will have a significant impact on an area that is heavily trafficked by general aviation.

We appreciate the FAA's concerted effort to heed the findings of the Ad Hoc Committee and to craft changes to the Class C airspace accordingly. As noted in previous comments by AOPA, the compromise reached on the 2,300' floor of the Class C along the lakefront, as well as the utilization of visual landmarks as reference points, are welcome developments and will be beneficial to general aviation.

However, we believe that there are changes needed to the Letter of Agreement (LOA) between Chicago Terminal Radar Approach Control (TRACON) and Midway Air Traffic Control Tower (ATCT) regarding visual approaches to Runway 22L.

FAA agreed with the Committee's recommendation of the above-mentioned 2,300' Class C floor along the lakefront, which provides a 700' buffer between that floor and the minimum crossing altitude of 3,000' at DXXON for aircraft operating on the MDW RNAV Runway 22L approaches. This buffer was largely intended to prevent Traffic Alert and Collision Avoidance System (TCAS) Resolution Advisories (RAs) in air carrier aircraft crossing over the VFR corridor.

According to FAA comments in the NPRM, the above-mentioned LOA requires that IFR aircraft conducting visual approaches to Runway 22L must only maintain 2,500' until contacting MDW ATCT. This could easily lead to IFR aircraft crossing the VFR lakefront corridor only 200' above the 2,300' Class C floor, resulting in possible wake turbulence issues, a possible loss of separation and more frequent TCAS RAs.

We acknowledge that Runway 22L visual approaches are rarely used, but we believe FAA should alter that LOA to require IFR aircraft conducting Runway 22L visual approaches to remain at or above 3,000' until reaching the shoreline (or until reaching DXXON). Not only will this provide additional separation from VFR aircraft operating in the lakefront corridor, but it will also provide consistency with the other IFR approaches to Runway 22L.

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Aside from these concerns, the FAA is to be commended for their work on this project, outreach to the local pilot community, and efforts to minimize the impacts to general aviation traffic along the Chicago lakefront.

Thank you for reviewing our comments on this important issue. Please feel free to contact me at 202-509-9515 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. McClay". The signature is written in a cursive, flowing style.

Jim McClay
Director, Airspace, Air Traffic and Security

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.