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June 6, 2008

RE: AOPA Request for Reevaluation of Restricted Area 6413 (R-6413)

Dear Mr. Wickman:

The Aircraft Owners and Pilots Association (AOPA), representing more than 414,000 general aviation (GA) pilots, including over 14,600 in the Utah and Colorado states, requests the United States Air Force (USAF) work with the Federal Aviation Administration (FAA) to reevaluate the need for Restricted Area 6413 (R-6413) in accordance with FAA Order 7400.2, Chapter 21, Section 8.

According to the Utilizations Reports from years 2006 and 2007 that AOPA obtained from the USAF, the airspace has not been activated once in that time. Through discussions with Denver Federal Aviation Administration (FAA) Air Route Traffic Control Center (ARTCC) personnel, the controlling agency for R-6413, it has become apparent that the airspace has most likely sat unused for over a decade.

The FAA guidance for this process stipulates that it should be "confirmed that the user has a continuing requirement for the airspace." In light of the absence of use, AOPA contends that there is not a requirement for the airspace and requests the USAF initiate the Airspace Disposition Process in accordance with Air Force Instruction (AFI) 13-201, Chapter 3.9, if it is determined that the airspace is no longer required.

Furthermore, R-6413 was established prior to the National Environmental Protection Act (NEPA) of 1969. Because of this, the impacts that R-6413 have on the surrounding environment, including airspace which is defined as human environment, have never been assessed. If the USAF intends on maintaining the airspace for uses other than what the airspace was originally intended for, with respect to the Green River Launch Complex, AOPA contends that a full Environmental Impact Study must be conducted to fully disclose to the public the impact to the environment this Restricted Area and associated activities would have.

AOPA values the working relationship with the USAF and looks forward to working collaboratively on this issue.

Sincerely,

Pete Lehmann
Manager
Air Traffic Services