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Re: Draft Environmental Impact Statement for Powder River Training Complex

Ms. DeVine

The Aircraft Owners and Pilots Association (AOPA) represents the interests of more than 410,000 general aviation pilots and aviation enthusiast nationwide. On behalf of our members, we support the United States Air Force (USAF) and their need to conduct training in a manner in which they fight. However, the massive airspace expansion being proposed in the Powder River Training Complex (PRTC) Draft Environmental Impact Statement (DEIS) would be the largest Special Use Airspace (SUA) complex in the United States and cover an area of approximately 28,000 square miles, roughly the size of South Carolina. AOPA contends that the PRTC is an overly expansive airspace request that will severely and unnecessarily impact the national airspace system and the operators who fly in the affected airspace. The USAF has not provided sufficient justification for such a massive expansion of the airspace for year round activities.

While large areas of special use airspace and generous charted times of use translate into flexibility for the USAF, that flexibility results in substantial negative impacts on general aviation. The proposed PRTC will result in significant economic impacts to airports, flight schools, pilots, and small businesses that rely on general aviation. AOPA is also concerned with multiple safety issues related to the PRTC including high speed, low altitude maneuvering, deployment of chaff and flares, and limited radio communications and radar coverage. For these reasons, AOPA opposes the PRTC proposal for year round airspace expansion and provides the following concerns and associated impacts of the proposed airspace expansion.

Proposed airspace does not match demonstrated need

The PRTC proposal would establish four Military Operations Areas (MOA) extending from 500 feet above ground level (AGL) to 12,000 feet mean sea level (MSL) with charted times of use amounting to 44.5 hours per week. However, the DEIS states that the USAF expects to use most of these MOAs for just 15 hours per week. While charting 44.5 hours of use provides enormous flexibility for the USAF, it would increase operating expenses, increase delays, and degrade safety for 285 based civil aircraft and countless Visual Flight Rules (VFR) transient operators who will be required to traverse an active MOA to arrive or depart one of 39 airports underlying the PRTC. Pilots operating under Instrument Flight Rules (IFR) will be routed around the MOA's when they are in use and likely will incur delays as a result of reroutes. In addition, the proposal provides for the use of Notice to Airmen (NOTAM) to schedule SUA outside of charted times of use. With a minimal need provided in the justification for the proposed expansion, the extensive charted times as well as the allowance of additional flexibility seems excessive. .

According to page 2-40 of the PRTC DEIS, only 75 to 100 minutes per week will be spent at altitudes below 2,000 feet AGL. AOPA questions the need to activate airspace below 2,000 feet for the same duration as airspace above 2,000 feet when it is only expected to be used 10% of the time. Perhaps subdividing actual needed airspace would be a better solution than requesting a massive SUA with excessive charted times. Similar solutions could have resulted from early dialogue with the user community had they been part of the planning process from the conceptual phase of ai rspace development.

Economic Impacts of the Proposal are Excessive

The USAF is required to give public use airports that underlie the MOA a 3 nautical mile radius and 1,500 foot exclusion area. However, this exclusion area does not allow for aircraft to ingress and egress the airport safely nor does it provide any accommodation to the 20 private use airports that would be unusable during times of PRTC SUA activation. Without real time SUA data, locally based and transient pilots will lose flexibility in choosing departure and arrival times at airports underlying the PRTC. In the long term, this reduction in flexibility will result in businesses and private owners relocating their aircraft outside of the PRTC to avoid the expense and delay associated with operating through expansive special use airspace.

Fixed base operators (FBO) rely on local and transient aircraft as their primary sources of income. When local operators begin relocating their aircraft to airports outside of the PRTC, income from fuel sales, hangars, and tie down fees will drop precipitously. Based on data contained in the 2007-2008 Montana Economic Impact of Airports Study, the average airport underlying the PRTC provides 5 jobs, \$81,000 in annual payroll, and nearly \$200,000 in economic activity to the surrounding community. With 19 publicly owned airports underlying the PRTC, this translates to approximately 95 jobs, \$1,539,000 in annual payroll and \$3,800,000 in economic activity in the surrounding communities directly attributed to the airport. This economic activity is not sustainable under the PRTC and will be eroded until reaching a point where operating an aviation business under the PRTC is no longer financially viable. Transient aircraft will be more likely to utilize an airport outside of the PRTC even if means renting a car and driving to their desired destination inside the PRTC. This will further erode the FBO's income through lost fuel sales and ramp fees. Operating margins for an FBO are extremely thin and even a small decrease in normal traffic levels will have devastating consequences to these small businesses.

The PRTC will destroy the flight training industry at 39 airports underlying the proposed airspace. In the DEIS, the USAF explained that one of the key drivers of the PRTC was avoiding expensive, unproductive commutes to distant ranges. The same can be said for general aviation pilots who are paying for flight training as well. Flight instructors would be forced to choose between conducting a flight in an active MOA with low altitude military aircraft operating at speeds in excess of 500 knots, or commute as much as 50 minutes to conduct the flight training outside of the SUA. A typical general aviation training flight lasts approximately 1.5 hours. Adding an additional hour and forty minutes of flight time to every flight lesson will more than double the cost of earning a pilot certificate. When faced with additional flight time expenses exceeding \$7,000.00 over the course of their private pilot training, potential student pilots will simply drive to an airport outside of the PRTC, or forego learning to fly altogether. This is too high a price for civil aviation to pay when other options must be considered by the USAF to be a responsible steward of the national airspace system.

We appreciate the USAF's willingness to return SUA to the National Airspace System (NAS) when it is no longer in use, as mandated by the Federal Aviation Administration (FAA) Joint Order 7400.2G, paragraph 21-1-8. Unfortunately, the lack of real-time information sharing makes it nearly impossible in the current airspace environment for non-participants to know the actual status of a SUA at a given time. Although the USAF plans to notify Air Traffic Control (ATC) when the airspace is no longer active, there is limited communication coverage in the PRTC area making it unlikely that general aviation pilots will be aware that the SUA has been deactivated, or is about to be activated. Because general aviation pilots as well as other operators do not have access to real-time SUA data, pilots are forced to typically rely on the charted times of use for a given SUA area. The excessive charted times of use and lack of real-time information compound the economic impacts of special use airspace.

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Safety Concerns of Non-Participating VFR Traffic

General aviation traffic operating within the boundaries of the proposed PRTC use see and avoid to mitigate the risk of a mid air collision. The success of see and avoid is dependent on aircraft below 10,000 feet operating at or below 250 knots. The USAF plans to operate at speeds up to 540 knots within the PRTC. While this operation may be legal under the USAF's waiver with the Federal Aviation Administration (FAA), it does not make good sense nor is it a responsible use of this massive airspace area. At best, this operation will render see and avoid difficult to impossible. Despite the waiver permitting operations in excess of 250 knots below 10,000 feet, the requirements for see and avoid remain. The USAF has not explained how, at more than 500 knots, they plan to see or avoid a VFR aircraft operating legally within the active MOA.

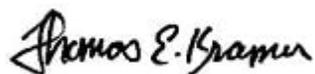
Because the proposed airspace will be accessible to non-participating VFR aircraft, there are increased risks associated with the release of chaff and flares that the USAF has not adequately identified. The flares burn in excess of 2000 degrees Fahrenheit for at least 500 feet vertically, creating a risk of the flare embers coming into contact with non-participating aircraft. With the failure rate of these flares at 1%, there is also a potential for an un-ignited flare (dud) to come into contact with a non-participating aircraft while in flight. The damage that would result from such contact would range from minor to disastrous and could potentially result in loss of life.

The use of chaff within the proposed MOA poses a similar risk. By design, chaff must form a cloud of metallic fibers at least 30 meters in diameter. The risks to non-participating civil aircraft unknowingly flying through one of these clouds includes, but are not limited to: in-flight windscreen blanketing, engine foreign object damage (FOD), turbine FOD, propeller FOD, aircraft environmental system contamination, and possible navigation and communication equipment interference.

Summary

AOPA understands and respects the military's need to train. However, the massive scale of this airspace will have devastating impacts on the general aviation industry. The size and charted times of use are excessive, unjustified, and must be reduced. We strongly recommend the USAF utilize early and continuous dialogue with the user community during the development of additional SUA to meet training requirements. Based on the economic impacts and safety concerns with the proposed expansion of the PRTC, we strongly recommend the USAF go back to the drawing board and involve users in a meaningful dialogue to ensure any considered airspace expansion includes input from the user community. As proposed, AOPA opposes the PRTC due to the lack of justification for this expansive airspace design and its substantial impact on civil aviation. We appreciate the opportunity to provide comments on the Draft Environmental Impact Statement for the Powder River Training Complex.

Sincerely,



Thomas E. Kramer
Manager
Air Traffic Services