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Naval Facilities Engineering Command Southwest
ATTN: 29Palms EIS Project Manager
1220 Pacific Highway
San Diego, CA 92132-5190

Re: Draft Environmental Impact Statement for Land Acquisition and Airspace Establishment at Marine Corps Air Ground Combat Center Twentynine Palms, CA

Dear Sir or Madam,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to U.S. Navy's Draft Environmental Impact Statement (DEIS) for Land Acquisition and Airspace Establishment at Marine Corps Air Ground Combat Center Twentynine Palms, CA. Based on the expected annual usage, a Temporary Military Operations Area (MOA) would largely meet the military's requirements while mitigating many of the concerns of general aviation. The proposed action is located in a corridor of high air traffic volume making even a modest expansion problematic. Any expansion westward will compress civilian air traffic operating between southern California and points east. However, several opportunities exist to improve the planned airspace action in Alternative 2 that would further mitigate the impact on general aviation.

Temporary MOA could accomplish goals

The Executive Summary states that the purpose of the proposed action is to permit Marine Expeditionary Brigade exercises which will take place twice a year for 24 days per event. For a training activity that occurs so infrequently, a Temporary MOA would address the military's need for training airspace while substantially reducing the impact on general aviation. Because real-time special use airspace status updates are not currently available, pilots must rely on charted times of use. According to a recent survey by AOPA, 67% of pilots circumnavigate special use airspace regardless of its activation status due to the lack of timely and reliable information. It seems that the full time establishment of special use airspace (SUA) is extreme considering the MOA would be inactive 87% of the year.

Insufficient altitude for transiting traffic

The Twentynine Palms Special Use Airspace (SUA) complex is uniquely located in a major air traffic corridor. Pilots attempting to fly between southern California and points east will likely attempt to fly under the CAX MOA east of R-2501. The proposed CAX MOA floor of 1,500 feet does not provide sufficient room for bi-directional traffic and offers questionable margins for a safe maneuvering altitude in mountainous terrain. AOPA requests that the floor of the proposed CAX MOA be raised to a minimum of 4,000 feet to address these issues. If such an increase is not possible, AOPA requests that the CAX MOA be subdivided into a low and high sector so that only those areas essential to a specific training event be activated at any given time.

Given the configuration of the Sundance, CAX, and Turtle MOAs, AOPA requests that the boundaries be amended to permit through traffic to utilize the increased floor height of the CAX MOA corridor. Specifically, by relocating the eastern boundary of the Sundance MOA further west, civilian traffic would have access to the corridor under the CAX MOA.

Soaring Operations over Blackhawk Mountain and Twentynine Palms Airport

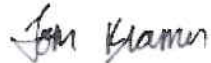
In addition to transient traffic operating between southern California and points east, the eastern portion of Blackhawk Mountain is a popular soaring location and serves as both a launch point and a way point for soaring flights heading east. Any expansion of the Twentynine Palms SUA Complex westward will encroach on this active soaring area. Alternative 2 offers the smallest westward expansion and with the use of a Temporary MOA would mitigate the soaring community concerns to a large extent.

Summary

AOPA recognizes and supports the U.S. Marine's need to train as they fight. The Twentynine Palms SUA complex, with some modifications, represents a unique training asset for the U.S. Marines that could result in meeting the Marine's training needs while mitigating the impact on general aviation flight operations. The use of a temporary MOA in place of charted special use airspace will substantially improve efficiency and access for general aviation while providing the needed training airspace for U.S. Marines. Increasing the floor of the CAX MOA to 4,000 feet will mitigate the impact on transient traffic between southern California and points east.

We appreciate the opportunity to submit comments on the Twentynine Palms DEIS.

Sincerely,



Tom Kramer
Manager, Air Traffic Services