



421 Aviation Way  
Frederick, Maryland 21701

T. 301-695-2000  
F. 301-695-2375

[www.aopa.org](http://www.aopa.org)

February 16, 2012

Mrs. Amy Burt  
Naval Facilities Engineering Command Northwest  
1101 Tautog Circle, Suite 203  
Silverdale WA 98315-1101  
Attn: NWSTF Boardman Project Manager

RE: Revised Notice of Intent to Prepare an Environmental Impact Statement for Military Training Activities at the Naval Weapons Systems Training Facility Boardman, OR and Notice of Request for public scoping comments

Mrs. Amy Burt,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, submits the following comments in response to the revised Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for military training activities at the Naval Weapons Systems Training Facility (NWSTF) Boardman, OR, and notice of request for public scoping comments. AOPA would offer that any request for new Special Use Airspace (SUA) must include the return of existing unusable SUA as described in the NOI. In addition, we recommend that future notifications on the EIS and associated alternatives be made available for at least a 60 day public review and comment opportunity.

#### **Release of Airspace**

Based on the NOI, the justification for requesting new SUA is a result of the proliferation of obstructions in the national airspace system (NAS). AOPA understands the challenges that exist from competing interests within the NAS and their associated impact on airspace operations. In light of the fact the Department of the Navy (DoN) has indicated the existing SUA is no longer useable or adequate for training, we strongly urge the DoN to return all SUA that can no longer be used. Any request for new SUA resulting from the encroachment of wind turbines, should be accompanied by a return of airspace that no longer meets the needs of the DoN training requirements. This giveback of airspace will allow for the continued use of this airspace for civilian operations as necessary.

Mrs. Amy Burt  
Page 2  
February 16, 2012

**Correct Information and Adequate Public Review Time Imperative**

The allotment of only a 30 day comment period as proposed was insufficient and we appreciate the DoN extension to allow for adequate dissemination of the revised NOI and opportunity for comment. As AOPA has shared previously, early, open and transparent communication between the requesting agency and all affected parties is key to making this a successful process. As you move forward with preparation of the EIS, we would recommend a minimum of 60 days be offered for future public review and comment. This will further help to ensure that substantive issues are brought to light and addressed.

**Summary**

We appreciate the opportunity to comment on the NOI to prepare an EIS and strongly encourage the DoN to return any unused airspace back to the NAS as they seek to implement new SUA to meet mission and training requirements. In addition, a 60 day public review and comment period for future notification will go great lengths in ensuring adequate input and comments are afforded.

We look forward to working with you further on this endeavor.

Sincerely,



Sr. Government Analyst  
Air Traffic