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RE: Cheyenne Military Operations Area Modification Draft Environmental Assessment

Captain Overstreet,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the United States Air force (USAF) draft Environmental Assessment (EA) to modify the Cheyenne Low and High Military Operations Area (MOA). While AOPA appreciates the effort of the military in crafting the draft EA, there are a number of issues that pose operational and economic impact on local and transient aviation operations that require additional mitigation.

Compression of Traffic - A Significant Impact

AOPA appreciates the efforts of the USAF to return Special Use Airspace (SUA) to the National Airspace System (NAS) when it is no longer needed for military training purposes. However, While technically raising the floor of the Cheyenne Low MOA from 300 to 500 feet Above Ground Level (AGL) is considered an airspace “giveback”, the airspace below 500 feet AGL is unusable for most practical purposes or navigation unless departing or arriving an airport. A more beneficial alternative would be to lower the ceiling of the Cougar Low MOA to better compartmentalize the less used airspace for the purpose of returning it to the NAS when not in use, per Federal Aviation Administration (FAA) Order 7400.2J, paragraph 21-1-8.

For example, the Cheyenne Low and High MOA were used for only 923 hours in Fiscal Year (FY) 10 or approximately 10.5% of the year. If the new Cougar Low MOA was modified and the charted times of use more accurately reflected its actual use, it would provide civil operators with usable airspace for the other 89.5% of the year.

Impacts at Eads Municipal Airport (9V7) and Tribune Municipal Airport (5K2)

AOPA is encouraged that the Air National Guard is maintaining the cutout, referred to in the draft EA as the “flight exclusion bubble” around the Cheyenne Wells airfield. However, 9V7 and 5K2 remain affected to a great extent. 9V7 would lie directly under the proposed

Cougar Low MOA; per FAA Order 7400.2J, paragraph 25-1-4 the USAF is required to give public use airports that underlie a MOA a 3 nautical mile (NM) radius and 1,500 foot exclusion area. Lack of this exclusion area would make transiting to the airport extremely difficult during the times the MOA is active. 5K2 would lie within two miles of the southern boundary. Aircraft arriving from or departing to the north would run the risk of having to transit the active MOA. Both scenarios have the potential to increase the rate of mishaps and could be mitigated by raising the floor of the MOA as prescribed in FAA Order 7400.2J.

Additionally, the FAA recently completed an aeronautical survey for 5K2 to develop instrument approach procedures – instrument approach procedures that would be impacted by the proposed Cougar Low MOA. AOPA requests that the USAF reevaluate the proposed boundary to the north of 5K2 to accommodate future instrument approach procedures and all weather access to this general aviation airport.

Impact on Victor Airways V17 and V216

The proposed modification would impact portions of two victor airways including V17 southeast of the Goodland Very High Frequency Omnidirectional Range (VOR) and V216 northeast of the Lamar VOR. To mitigate the impact on these airways, AOPA recommends the Denver Air Traffic Control Center (ARTCC) and the USAF work collaboratively to mitigate the impacts on general aviation pilots utilizing these airways under Instrument Flight Rules (IFR) by allowing the transition through the MOA instead of having to be routed around the airspace when possible.

Economic Impact

Private pilots, helicopters, small charter companies, agricultural pilots, flight schools, as well as small businesses that operate aircraft all have the potential to be adversely impacted by this proposed modification. Leoti's Hoard Memorial (3K7), Scott City (TQK), 9V7 and 5K2 are all located under or within miles of the proposed boundary of the Cougar Low MOA. These airports are vital to the local economy providing economic benefits in excess of \$9,782,100 dollars. Transiting to and from these airports becomes much more difficult when the proposed MOAs are active and has the potential to decrease the amount they are used. Based on the fact pilots do not have access to real-time SUA information, they typically rely on the charted times of use for a given SUA area. The lack of real-time information compounds the economic impacts of the proposal. More transparency with operational information could assist in alleviating some of these issues.

Public Relations Needs to be Consistent

The transparency the Colorado Air National Guard website provides is appreciated, however the information in certain documents is inaccurate. For instance, the background document states "When the military operations areas are in use by military aircraft, they

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cannot be used by commercial or civilian aircraft which will decrease the noise level from such air traffic in the area.” This is an inaccurate statement as per FAA Order JO 7400.2J, paragraph 25-1-6, “In effect, MOAs are always joint use in that VFR aircraft are not denied access, and IFR aircraft may be routed through the airspace, by agreement between controlling agency and using agencies.” While the draft EA does not appear to reflect the background document arguments, it is important to verify the accuracy of all resources to ensure the public is not misinformed.

In addition to the background document, the draft EA provides little detail in map form with regard to exact location of the proposed SUA boundaries. While latitude and longitudes are provided in the appendices, there is no map provided that clearly shows the relationship between the proposal and airports in the vicinity. The casual observer would be required to plot the coordinates in order to understand the impact of the proposal. A pilot with potential concerns is unlikely to do this and therefore unlikely to truly understand how the proposal could affect them. AOPA recommends including the current and proposed SUA, overlaid onto a Sectional and Low Altitude Enroute Chart. This will provide for much better clarity as to what is being proposed.

Reduction in Noise Questionable

The draft EA and associated documents go into great detail on the effective reduction of noise by the proposed action. AOPA is concerned that this presumption is largely misleading. The draft EA states the amount of sorties conducted will remain unchanged but be conducted in a larger area. It goes on to detail that the floor will be raised 200 feet. Simply spreading out the same amount of sorties and raising the floor a small amount is not a strong argument in favor of an actual noise reduction. We would offer that unless the amount of operations is decreased, the overall noise remains comparable to current operations – even if spread out over a larger area.

Summary

We understand the mission conducted during military training is critical to ensuring readiness. Compliance with FAA recommended cutouts for impacted airports and coordination between the FAA and the Air National Guard will help mitigate the identified impacts of the proposed SUA changes for the general aviation community. We appreciate the opportunity to offer input and look forward to seeing additional changes in the final design.

Sincerely,



Melissa Martin
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