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September 3, 2013

Ms. Johanna Forkner  
Federal Aviation Administration  
Northwest Mountain Region  
1601 Lind Ave S.W.  
Renton, WA 98057

Re: Aeronautical Study No. 13-AAL-8NR, Notice of Proposal to Establish Special Activity  
Airspace Area, Oliktok, AK

Dear Ms. Forkner,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Department of Energy's (DoE) proposal to establish a Warning Area over the Arctic Ocean north of Oliktok, Alaska (AK). AOPA is concerned with the proposed warning area's size, proximity to the shore, and the lack of a transit area for visual flight rules (VFR) aircraft. Further, the safety of non-participating aircraft over the proposed airspace area could be accomplished with other equally effective actions. The flying public could be alerted to the activities described in the proposal without establishing a large Warning Area.

#### **Proximity to land unacceptable**

According to the Notice of Proposal, the DoE plans to utilize the Special Activity Airspace (SAA) for, firing ice-penetrating projectiles downwards from aircraft and deployment of upward-directed sounding rockets from the surface and from aircraft, etc. These hazardous activities would be conducted in a relatively close proximity to shore. AOPA is concerned that there would not be enough of a transit area for VFR aircraft to avoid harm's way. We would urge the Federal Aviation Administration (FAA) not to consider any proposal to establish SAA that is not at least a minimum of 12 Nautical Miles off the shoreline.

#### **Alternatives to permanent SAA need to be considered**

The proposal states that the times of use of the proposed SAA will be established by a notice to airmen (NOTAM). AOPA would suggest that a more efficient use of airspace would be to issue a NOTAM describing locations, altitudes, and times of use for each activity, thereby eliminating the need to establish permanent SAA. Additional information for alerting pilots to any activities could include, notes on aeronautical charts informing pilots to check for NOTAMs and to refer to publications with more information such as the FAA's AK Supplement, the Aeronautical

Information Publication, and the International Flight Information Manual. These options would eliminate the need for establishing such a large volume of SAA.

**UAS activity would require public notification**

In the current proposal, there is no mention of unmanned aerial systems (UAS) activity. AOPA would fully expect that no UAS operations would be occurring in the proposed SAA without further public notification and an allotted opportunity for comment.

**Unclear graphic could lead to inaccurate feedback**

AOPA would appreciate in the future that the FAA include a more detailed graphic with any airspace proposals. When public comment is being solicited, it is critical that accurate information is provided that can be easily digested. In this case, the graphic provided lacks true distance information to the shoreline, making it difficult to understand the full spectrum of the proposal. Although the FAA did provide latitude and longitude information, plotting this is time consuming and may be done incorrectly, leading to inaccurate feedback.

**Summary**

AOPA appreciates the opportunity to comment on the proposed SAA, but has concerns regarding the size and proximity to land that need to be addressed. Additionally, alternatives to permanent SAA need to be considered prior to moving forward with any proposal. We would encourage the DoE and FAA to coordinate and utilize existing SAA prior to establishing any new areas.

Sincerely,



Melissa McCaffrey  
Senior Government Analyst  
Air Traffic Services