AIRCRAFT OWNERS AND PILOTS ASSOCIATION
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October 29, 1999

Mr. George Orr
Manager, Air Traffic Division, ANM-500
Federal Aviation Administration
1601 Lind Avenue
Renton, WA 98055-4056

Re: Salt Lake City Airspace Redesign

Dear Mr. Orr:

The Aircraft Owners and Pilots Association (AOPA), on behalf of over 355,000 pilots, has reviewed the proposed changes to the Salt Lake City, Utah (SLC) Class B airspace. AOPA reviews all Class B airspace proposals and studies the impact that they will have on general aviation operations. It appears that this proposal will adversely affect the safe access that general aviation pilots have to an outlying airport and the efficient use of the airspace above the SLC Class B airspace. It also appears that there isn't any valid data supporting the need to expand the airspace area.

AOPA talked with the facility (Salt Lake City TRACON) and the regional office to learn of the issues that instigated this change. Discussion with the region and facility revealed that the local users working group did not achieve consensus on this airspace design. Since the Federal Aviation Administration (FAA) intends to push this proposal through the rulemaking process quickly, the quality of the redesign is poor and the general aviation community will be most affected by the changes. As you may be aware, recent work by San Diego airspace users, in concert with local FAA consultation resulted in a consensus-based redesign of the San Diego airspace in San Diego, California.

When asked why the FAA had identified a need to redesign the airspace, both the facility and the Regional office explained: "There have been numerous complaints by controllers and pilots about Near Mid-Air Collisions (NMAC's) in the last two years." They also indicated that there are many "TCAS events" West of SLC where turbojets fly a downwind for arrival or fly published departure procedures. The FAA also told AOPA that specific instances of these "TCAS events" must be obtained through a request under the guidelines established in the "Freedom of Information Act." If this information is being used to determine airspace policy at SLC, it should be available to all users.

AOPA searched the FAA's Near Midair Collisions System and the Air Safety Reporting System (ASRS) for reports of NMAC's between non-participating general aviation

aircraft and air carrier aircraft in the SLC area. Our research revealed three NMAC reports from 1985 until October 25, 1999 that involved general aviation. Two of the NMAC's occurred while the aircraft were maneuvering at or below the traffic pattern altitude. The third, although not specifically mentioned, could possibly have happened West of SLC. The report says that the NMAC occurred at 9,500 feet MSL, below the existing Class B ceiling. The only ASRS report we could find in the vicinity of SLC was submitted by an air carrier who was only 1,200 feet above airport elevation when they flew too close to traffic landing on a parallel runway at SLC.

Another important statistic that is not available to the public is the number of daily over-flights between 10,500 and 12,500 that do not communicate with air traffic control. It is unclear how this proposal has reached this stage of the redesign process without such information. AOPA requests that the FAA publish this information so interested persons can assess the policy decisions made by the FAA.

As you can see from our research, AOPA has not found any safety reports or documented occurrences of NMAC's or "TCAS events". As for the current proposal, there are two concerns that our membership has brought to our attention, the increased height of the Class B airspace and the added airspace area east of the Ogden-Hinkley Airport (OGD) in Odgen, Utah.

1. ***Increased height of the Class B airspace.***

   Discussion with the TRACON revealed that there is a 500-foot "buffer" added to the proposed airspace ceiling. AOPA is not aware of any other airspace designs where this buffer is added. The FAA publication "Procedures for Handling Airspace Matters" does not recommend or describe such a buffer. The Aeronautical Information Manual (AIM) has advised pilots to remain clear of altitudes close to regulated airspace altitudes (paragraph 3-2-3 part f.). This guideline essentially recommends that pilots operating under Visual Flight Rules (VFR) are to provide the buffer from airspace floors and ceilings themselves. Federal Aviation Regulation (FAR) Part 91.159 (a) requires pilots operating under VFR to fly at altitudes plus 500 feet (e.g. 4,500 or 5,500) whenever they operate at altitudes above 3,000 feet above ground level (AGL). Since the terrain elevation West of SLC (where the alleged NMAC's and TCAS events are occurring) is less than 7,000 feet MSL, the airspace redesign must assume that pilots are flying in accordance with FAR Part 91. Implementing this buffer eliminates one more cruising altitude that general aviation pilots will have available.

   In all, three cruising altitudes will be lost if this proposal is implemented. Many pilots will not be able to over-fly the class B without using oxygen and they are not

confident that air traffic control service levels will improve from what they experience today. Aircraft capable of operating at altitudes over 10,000 feet usually cost a minimum of $100/hour to operate. If the average cost of operation for these aircraft was $120/hour, the added cost to navigate around the airspace would be approximately $60 when they are denied access to transition the class B airspace. It is doubtful that many passengers traveling by air would be willing to pay an additional $60 to fly the same route they have previously traveled. AOPA believes that there are solutions to the problems that the FAA has identified which can save general aviation travelers money and time, while resolving the concerns brought forward for resolution.

It appears that the FAA is trying to increase the size of the airspace to contain non-radar air traffic procedures in the class B airspace. The FAA wants to separate the arrival traffic on the downwind vertically from the departure traffic. At the same time, the FAA proposes to expand the airspace horizontally. General aviation pilots have told AOPA that they do not regularly operate over the Salt Lake therefore indicating that the adverse affect of expansion westward is not as critical as the expansion upward. The FAA should evaluate the possibility of moving the arrivals further from SLC and keeping the departure aircraft close to SLC. With this action, AOPA believes that there would be enough lateral separation to prevent the need for an increase in the height.

AOPA also challenges the FAA assumption that there will be a significant arrival and departure flow simultaneously when sequencing of the aircraft becomes difficult or impossible. During period of heavy departures, the limited arrivals can be sequenced through the departure stream to clear the departure track. Conversely, the departures should be sequenced through the arrivals on the downwind when arrival rates are high.

The SLC Terminal Area Chart (TAC) does not depict any of the arrival or departure tracks that the facility claims to use 80% of the time. A cursory look at the published TAC reveals that pilots are led to believe that there is little or no traffic where the facility and region indicate that the heaviest flow is now occurring. Existing charting standards require depiction of these tracks. We believe that by enhancing the quality of charts available to VFR pilots, concerns voiced by pilots and controllers will be alleviated. AOPA is disappointed that the FAA is proposing airspace rulemaking before attempting to mitigate alleged safety concerns by educating the general aviation community about traffic flow to and from SLC.

2. ***The new airspace area east of OGD.***

This area sector will eliminate parachute-jumping activity at the airport unless the facility agrees to provide separation services for this activity without a noticeable

increase in delays. Parachute jumping activities should not cease as a result of this new sector of airspace. AOPA does not understand why the changes are needed now when it appears that there have been parachute operations and arrivals to Runway 17 at SLC for many years.

AOPA is also concerned that OGD operations to and from the East are compressed between the airspace floor and the terrain. This compression will increase the possibility of a mid-air collision or a Controlled Flight Into Terrain (CFIT) accident. Just 1.5 miles separate a 9,570-foot mountain peak from the start of an airspace floor of 10,000 feet MSL. When wind conditions create turbulence and updrafts/downdrafts, the probability of aircraft crashing into the terrain will certainly increase.

It is for these reasons that AOPA is opposed to the proposed expansion of the airspace. AOPA sees opportunities to use pilot education along with alternate means of design and procedural modification that mitigate the need for the vertical or horizontal increase of Class B airspace. AOPA does not oppose all airspace actions, but we do oppose those actions that will adversely affect the safe and efficient use of airspace by our membership. Please contact me at 301-695-2149 to discuss these issues as you consider changes to the design of the airspace. We appreciate the opportunity to comment on this airspace proposal.

Sincerely,

Randy Kenagy
Associate Director
Air Traffic Control Services

cc: Mr. Reginald Mathews
Director, Airspace Rules Division, ATA-400
Federal Aviation Administration