



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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August 26, 2005

Mr. John Warner
Manager, Airspace Branch
Western En Route and Oceanic Service Area
Federal Aviation Administration
1601 Lind Avenue, SW
Renton, WA 89055

RE: Airspace Docket No. 05-ANM-004-NR

Dear Mr. Warner:

The Aircraft Owners and Pilots Association (AOPA), representing over 405,000 general aviation pilots, including over 70,300 pilots in California, submits the following comments on the establishment of the Lemoore Military Operations Area (MOA) near Lemoore, California. AOPA opposes the floor of Sectors A, D, and E as currently proposed at 5,000 feet Above Mean Sea Level (MSL) in light of the significant negative impact on Instrument Flight Rules (IFR) traffic transiting through the San Joaquin Valley.

AOPA recognizes the training objective of the United States Navy (USN) and the California Air National Guard (CANG) to maintain a combat mission ready force near Navel Air Station Lemoore (NASL). However, all IFR aircraft transiting through the San Joaquin Valley will be vectored around the lower sectors when the MOA is active which severely limits a pilots ability to utilize direct area navigation (RNAV) routes through the Valley. The 5,000 feet MSL floor of the northern and southern sectors of the proposed Lemoore MOAs forces IFR traffic to circumnavigate the large footprint of the lower sectors of the MOA.

Furthermore, the handoff altitude for IFR aircraft between NASL Approach Control and Oakland and Los Angeles Centers is 8,000 feet MSL. Implementing the Lemoore MOA below 12,000 feet MSL would exclude aircraft movement in a considerable portion of airspace in south-central California. Without prior coordination between the FAA and military Air Traffic Control (ATC) facilities or raising the ceiling to accommodate users, MOA usage will result in a complete and unacceptable lack of access for IFR traffic.

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AOPA Recommendation for Mitigation

AOPA strongly recommends the floor of the proposed Lemoore MOA sectors A, D, and E be raised to 12,000 feet MSL to allow IFR aircraft to transit this large footprint of airspace below the MOA floor. A MOA floor of 12,000 feet MSL will set aside four usable IFR altitudes below the MOA floor and reduces the impacts of this proposal on the general aviation community while maintaining IFR and VFR access to multiple airports in the San Joaquin Valley.

AOPA appreciates the opportunity to provide comments on the impacts associated with the proposed Lemoore MOA and looks forward to working with the Navy to address those concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Heidi J. Williams
Director
Air Traffic Services