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ALCOM Public Affairs
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Re: Draft Environmental Impact Statement for the Modernization and Enhancement of Ranges, Airspace and Training areas in the Joint Pacific Alaska Range Complex

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Draft Environmental Impact Statement (DEIS) for the modernization and enhancement of ranges, airspace and training areas in the Joint Pacific Alaska Range Complex (JPARC). The U.S. Department of Defense (DoD) has proposed a significant expansion to the Joint Pacific Alaska Range Complex (JPARC) in support of military training. This complex, already the largest military airspace complex in the country occupies some 65,000 square miles of airspace over land, and 42,000 nautical square miles of airspace over the Gulf of Alaska. A series of proposals are included in the DEIS that would further expand this complex. It is imperative that aviation safety and access be preserved for civil users of the complex, given the importance of aviation for basic transportation in the state of Alaska.

Economic impact of civil aviation in Alaska

According to *The Economic Contribution of the Alaska Aviation Industry to Alaska's Economy*, by Northern Economics, Inc., the aviation industry in Alaska contributes \$3.5 billion, or approximately 8%, of the gross state product. The fact that this is proportionately almost 40% greater than the industry's role in the national economy demonstrates the importance of the aviation industry to Alaska's economy. An estimated 47,000 jobs are directly and indirectly related to aviation in the state of Alaska. Given the importance of aviation to the state's economy, it is important that the proposed changes to the airspace do not harm this industry, or significantly limit access to resources in the state.

Proposed MOA Expansion

The proposed expansion of the Fox 3 Military Operations Area (MOA) is a significant increase both in lateral and vertical dimensions, lowering the floor from 5,000 feet above ground level (agl) to 500 feet agl. The area encompassed in the proposed expansion is frequently used by

general aviation pilots and air taxi operators to support hunting camps and mining operations, conduct air tour operations, access recreational areas or make other uses of this region. Due to its proximity to the population centers of Anchorage, the Mat Su Borough and Fairbanks, where the airspace is heavily used by civil aviation, there would be an increased collision potential with high-speed military aircraft executing training maneuvers in the Fox 3 MOA airspace. Due to the importance of the proposed airspace area for access to the southern Alaska Range, Denali Highway and Talkeetna Mountains, and to minimize the risk of mid-air collision, expansion of the Fox MOA should be limited to no lower than 5,000 feet agl, and to the smallest possible lateral extent to minimize the risk of mid-air collision.

The DEIS includes the proposed Paxson MOA, which covers Isabel Pass and portions of the eastern Alaska Range. The pass is a major Visual Flight Rules (VFR) route which links northern Alaska with south central and south east regions of the state. Along the southern flanks of the Alaska Range are mining operations, recreational cabins, airstrips and lakes which experience high levels of use and are not compatible with high speed, low level military aircraft. While the concept of VFR corridors has been discussed, the variable weather in this area is not conducive to identifying a single corridor which tends to concentrate VFR traffic and increases additional potential for a mid-air collision risk. The proposed Paxson MOA should be limited to high altitude usage only, recognizing the importance of Isabel Pass, and the air traffic routes extending from the interior south to Gulkana and beyond for civil aviation.

Special Use Airspace Information Service Coordination

The creation of the Special Use Airspace Information Service (SUAIS) in the 1990's for portions of the JPARC has had a positive impact on VFR usage of the current airspace complex that extends across an area over 300 miles wide. In areas where there is adequate communication and surveillance, this has greatly improved the situational awareness for both civil and military airspace users. Pilots have reported that in the eastern portions of the complex, communications are not adequate and they are experiencing difficulties with the mix of civil uses and military training activities.

Any expansion of MOA airspace must have accompanying radio coverage, staffing and other elements of the SUAIS infrastructure to allow civil pilots to communicate with Range Control during times that MOAs are active. It is also essential that the tape recorded message broadcast during hours when Range Control is unmanned, be more uniformly broadcast across the JPARC complex. While the current language in the DEIS indicates that "funding will be pursued," given that we still do not have adequate communication in the existing airspace this is not ample assurance that infrastructure will be provided. It is essential that funding be allocated for the addition of radio repeaters, staffing or other infrastructure costs to provide sufficient coverage for any expanded airspace. This infrastructure should be installed and operational before any additional airspace is approved.

IFR Access to MOA airspace

Instrument Flight Rules (IFR) access is essential to improving access and aviation safety between Alaska's communities, including those that are under the MOA airspace already contained within the JPARC. Expansion of T-Routes and WAAS approaches are providing this

access under a wider range of weather conditions, adding to the benefits of the IFR system. Those benefits are seriously degraded by expansions of MOAs that preclude IFR access for all but emergency or Lifeguard flights. AOPA requests that no additional MOA airspace be added to this complex until provisions are made to provide real-time IFR access through active MOAs. While the access may be restricted to limited flight altitudes, it is essential that civil traffic, both emergency and routine, have access to communities both inside and adjacent to MOA airspace given the critical role aviation plays in the Alaskan transportation system. For example, an aircraft needing to fly from Fairbanks to Tok would normally make a relatively direct 158 nautical mile flight along the airways. When the Delta MOAs are active, aircraft are re-routed, increasing the distance around the airspace to 450 nautical miles, a 2.8 times increase in distance. Due to the huge size of this MOA complex, lacking the ability to cross them using the protections of the IFR system is a significant safety as well as economic impact on the aircraft operators, and the customers that pay for the increased operational cost.

The relatively low volumes of IFR operations suggest that the impact to military training of supporting IFR access would be minimal. As more military actions across the globe are conducted around civil flight operations, learning how to dynamically allocate airspace will also help the military “train like they fight.” The JPARC provides an ideal test bed to develop this capability, which will require cooperation with the FAA and military agencies.

Proposed Battle Area Complex Restricted Area

The proposal to establish restricted airspace over the Battle Area Complex southeast of Delta Junction is of particular concern to the civil aviation community. Existing Restricted Area 2202 to the west already forces civil traffic out of the most desirable terrain route to and from Isabel Pass, a major VFR corridor connecting the northern half of the state to south central and south eastern Alaska. Winds and highly variable weather associated with the Alaska Range and the mountain pass make it impractical to confine civil traffic to a single, narrow corridor in this area.

AOPA opposes the addition of restricted airspace as proposed in this area, given the need to access the mountain pass, unique weather and terrain, and presence of existing restricted airspace. We suggest the military seek other means to allow training to take place, such as the controlled firing area used today, where firing is halted when a civil aircraft enters the area.

Realistic Live Ordinance Delivery

The proposals to establish restricted airspace for live ordinance delivery impact access between Fairbanks, Delta, the Richardson Highway corridor and the recreational and mineralized areas in the Alaska Range to the south. Existing Restricted Areas R2211 and R-2202 already inhibit air traffic attempting to transit the airspace. Connecting these two restricted areas would create an overall barrier to access in this area; AOPA would like to see effective mitigation to address these concerns.

Remotely Piloted Aircraft/Unmanned Aerial Vehicle corridors

The DEIS proposes establishing restricted airspace corridors for the purpose of navigating Remotely Piloted Aircraft (RPA)/Unmanned Aerial Vehicles (UAV) from military airfields into various restricted airspace areas. There is no doubt that unmanned aerial vehicles play an

important role in today's military, and that training is required. Integrating these vehicles into the National Airspace System is currently a topic of discussion at the national level. Restricting civil airspace to accommodate UAV transits next to the second largest air transportation hub in the state is a concern for the civil aviation community.

The FAA has consistently denied the addition of new restricted airspace areas for the sole purpose of RPA/UAV operations or for anything other than hazardous activity since Restricted airspace is for containment of hazardous operations. En-route RPA/UAV flights transitioning between the Eielson Air Force base and existing restricted airspace is not a hazardous operation. The proposed establishment of restricted airspace corridors for this purpose is an attempt to circumnavigate the RPAs/UAVs inability to see-and-avoid participating traffic. While awaiting development of a true sense-and-avoid capability that will allow full integration of unmanned aerial vehicles into the National Airspace System, we must rely on other means to separate unmanned from manned aircraft without segregated airspace. The corridors that are proposed would clearly interfere with the safe and efficient access between Fairbanks, the Richardson Highway Corridor and the Alaska Range.

F-16 Relocation Proposal

While not identified in the JPARC Draft EIS, announcements in the press have communicated an Air Force plan to relocate the F-16 squadron, currently based at Eielson Air Force Base in support of military training activities, to Joint Base Elmendorf Richardson (JBER). The stated purpose of the proposed move is to reduce operating costs. Statements in the Draft EIS indicate that part of the justification for expanding the FOX MOA airspace to the south, is to reduce operational costs of training exercises, by lowering the amount of fuel required to reach the training airspace from JBER. These two statements seem to be in conflict with one another. It is also not clear what the impact of relocation of the F-16 squadron might have on airspace and the corresponding civil facilities in Anchorage, including Anchorage International Airport.

Given the conflicting nature of these two military proposals, it appears that the F-16 relocation cannot help but influence the cumulative impact of the overall JPARC proposal. More analysis of this plan by the military with presentation to the public is required to understand the true impact on this development to allow informed public comment.

Fifth Generation Fighter Jet Statement Inconsistent

AOPA has concerns with a portion of the JPARC document "description of proposed action and alternatives", Section 2.0, 2.1.1 Fox 3 MOA Expansion and New Paxson MOA which states, "...as the fifth generation of U.S. fighters (F-22 and F-35 aircraft) are developed, fielded and deployed in combat, pilots will need to train in the skills and tactics appropriate for these aircraft within an airspace best configured for such training." This statement is in direct contrast with the United States Air Force (USAF) F35A Training Basing EIS, Airspace and Range Use, F-35A, which states, "...flight activities would take place in existing airspace; no airspace modifications would be required for any of the scenarios."

It remains unclear whether the USAF is stating that the addition of fifth generation type fighters require additional airspace accommodations or they will be contained in existing airspace.

AOPA would welcome clarification on this issue as these two USAF documents appear to be in conflict with one another. With the national implications inherent in this debate, AOPA opposes the creation of additional Special Use Airspace to accommodate new aircraft without further consideration of a “giveback” of airspace no longer needed.

Evaluation of other Alaska MOAs

While the DEIS proposals focus on expansion of the airspace in the core area centered on Eielson AFB, there are historical MOAs in other parts of the state that are defined as elements of the JPARC. Given the emphasis on reduction of operating costs, this is an appropriate time to evaluate the present uses of the Stony, Naknek, Susitna and Galena MOAs to determine if they are still required to meet modern training needs. No data was found in the DEIS on uses of these MOAs other than limited use data on the Stony MOA.

AOPA would ask the DoD to perform an analysis of existing and future uses of Stony, Naknek, Susitna, and Galena MOAs as part of JPARC to establish their continued need given the changes in training requirements, and need for operational efficiency described in these proposals. Results should be included in the final JPARC Environmental Impact Statement and shared with the public with an opportunity for comment.

Summary

AOPA appreciates the opportunity to submit comments on the DEIS for the JPARC and looks forward to working with the DoD on solutions that equitably accommodate both the military’s need for realistic training, and the needs of the civil aviation community.

We urge the military to work collaboratively with the aviation community on plans that incorporate more effective IFR coordination for transit through active MOAs and more reliable SUAIS implementation. Finally, we implore you to keep in mind that airspace, especially in the Alaskan Frontier, is the lynchpin that enables many small communities to exist. Any alteration to this vital resource must be approached with the utmost caution. Thank you and please contact me with questions you may have.

Sincerely,



Melissa McCaffrey
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Air Traffic