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John J. Bathelemes, Commissioner
NH Department of Safety
Bureau of Hearings
33 Hazen Drive
Concord, NH 03305

RE: Establishment of a “no aviation zone” on the lower Bellamy River in Dover, NH

Dear Commissioner Bathelemes,

The Aircraft Owners and Pilots Association (AOPA) is the world’s largest aviation organization, representing the general aviation interests of pilots and aircraft owners, including more than 2,000 of our members in the State of New Hampshire. On behalf of our members, AOPA is committed to ensuring the safety, future viability, and development of general aviation as an integral part of a national transportation system.

We appreciate the opportunity to provide input in the discussion of seaplane access onto the Bellamy River. AOPA recognizes there are many ways to enjoy the river as well as many different ways to access it. We wish to focus on the use of seaplanes and encourage the Department of Safety to continue to permit their use at this location.

Pilot Certification

As are all credentialed pilots, seaplane pilots are held to extraordinarily high standards of conduct and training by the Federal Aviation Administration (FAA). They are required to obtain an absolute minimum of 40 hours (though most pilots train longer) of hands-on flight training with an FAA certified flight instructor. Once this initial instruction is complete pilots must demonstrate mastery of the aircraft by completing a practical exam. However, the exam does not mark the end of a pilot’s training. It is mandatory for pilots to complete periodic training sessions in order to continue using their privileges. Certification in seaplanes requires additional training and typically a second flight examination by an FAA-certified examiner.

Training topics include use of prudent judgment, aircraft control and maneuvering, obstacle avoidance, landing area assessment, sensitivity to community concerns, and aircraft regulations. Many pilots gain additional training through safety seminars and independent instruction on advanced topics. Pilots take pride in their professionalism, and that professionalism is demonstrated in the sound judgment they exercise when at the controls of an airplane.

Environment

Contrary to the claims of some, Seaplane operators are regularly cited with contributing to the health of the environment and specifically those waterways they frequent. Seaplanes offer minimally intrusive means of accessing a waterway, with a minimal wake that leaves only ripples when they land and takeoff. Since they are a means of access, once visitors have landed the engine is shut down and they go off to enjoy other forms of recreation, rather than continuously operate their motors for propulsion such as a motorboat. Across the state of New Hampshire, seaplanes are recognized as useful tools in conducting surveys of wilderness conditions, water quality analysis and provide emergency assistance and evacuation of injured or sick patrons as well as search and rescue functions.

Furthermore, the area of concern specified on the Bellamy River exists within the controlled airspace of Portsmouth International Airport at Pease. Aircraft are prohibited from operating within this airspace without two way communication with the control tower. While Portsmouth International is not immediately adjacent to water, it adjoins the Great Bay National Wildlife Refuge and safely conducts more than 39,000 aircraft operations annually with no inflation of wildlife strikes compared with similar airports across the country.

The volume of seaplane traffic is already limited by season. During the winter and early spring the river cannot be used by seaplanes due to ice. Seaplanes only use the river during a roughly six month period each year. Since the Bellamy River is brackish, those seaplane pilots who typically operate at freshwater facilities are deterred from landing there. Aircraft owners must actively prevent corrosion by avoiding salt water unless their aircraft have been specifically treated for that environment in advance. Inland pilots typically do not make that investment, so there is no reason to expect a sudden increase in seaplane traffic.

Thank you for your consideration of our views on this issue. We look forward to working with your department and maintaining seaplane access to the Bellamy River.

Sincerely,



Adam Williams
Manager, Airport Policy



Sean M. Collins
Eastern Regional Manager