



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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April 26, 2004

Mr. Donald Smith
Acting Manager, Airspace Branch, ASW-520
Airspace Study 2004-ASW-03-NR
Department of Transportation
Federal Aviation Administration
2601 Meacham Blvd
Fort Worth, TX 76193-0520

RE: 2004-ASW-03-NR

Dear Mr. Smith;

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 general aviation pilots, submits the following comments in reference to the proposed establishment of the Smitty Military Operations Area (MOA) near Socorro, New Mexico. AOPA opposes the low floor of the MOA as currently proposed at 500 feet Above Ground Level (AGL), which would lie directly underneath, and share the same lateral boundaries as the Cato MOA. This proposed MOA has a significant negative impact on Magdalena Municipal Airport (N29) and Visual Flight Rules (VFR) traffic transiting the area.

If the floor of the proposed Smitty MOA remains at 500 feet AGL, Visual Flight Rules (VFR) aircraft transiting this airspace area will be forced to circumnavigate the entire MOA footprint. In a recent survey, 73% of AOPA members indicate that they deviate around Special Use Airspace (SUA). This deviation around the airspace area will increase flying time by approximately 30 minutes while also increasing the pilot's cost for the flight.

According to Albuquerque Air Route Traffic Control Center (ARTCC), radar coverage within the footprint of the proposed MOA is intermittent below 13,500ft and radio communications capability is intermittent below 13,000ft. There is no guarantee that Albuquerque ARTCC will have the ability to offer separation between participating military aircraft and non-participating general aviation aircraft operating in the MOA. AOPA recommends that the proposed floor be raised to 3,000ft AGL to allow VFR aircraft to transit this large footprint of airspace below the MOA floor.

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Local pattern operations at Magdalena Municipal Airport (N29) will be negatively impacted as the proposed floor conflicts with the pattern altitude for safe operations of 800 feet AGL. We strongly encourage the Federal Aviation Administration (FAA) to exclude the airspace 1,500 feet AGL and below within a 3nm radius of the airport to allow for safe arrivals, departures and pattern operations at N29.

In addition, there are two privately-owned airports whose pattern altitudes would be impacted by the Smitty MOA floor. Before this proposal moves forward, in accordance with FAA Order 7400.2, there should be coordination with the airport operator to determine if there will be conflicts between the activities in the Smitty MOA and the private airport operations.

The proposal indicates Smitty MOA will only be active for one to two hours a day. However, the charted times are to be listed from 0800 local until 2200 local, Monday through Sunday. This discrepancy between charted and actual proposed use further solidifies the need for real-time reporting of SUA activity. Real-time reporting of SUA activity is extremely beneficial to general aviation pilots and greatly aids in pilot flight planning.

AOPA requests that the proposal be amended to mitigate the safety impacts to both the public-use and private airports impacted by raising the ceiling to allow for safe pattern operations and allow transient operations to be conducted safely under the MOA floor.

Sincerely,

A handwritten signature in black ink, appearing to read "Brent Hart", written over a horizontal line.

Brent Hart
Government Analyst