



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798  
Telephone (301) 695-2000 • Fax (301) 695-2375  
[www.aopa.org](http://www.aopa.org)

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October 18, 2005

Ms. Linda Devine  
HQ ACC/CEVP  
129 Andrews St., Suite 102  
Langley AFB, VA 23665-2969

RE: Draft Environmental Impact Statement (DEIS) for the Shaw Air Force Base Airspace Training Initiative, Shaw Air Force Base (AFB), South Carolina

Dear Ms. Devine,

The Aircraft Owners and Pilots Association (AOPA), representing over 405,000 general aviation pilots nationwide, provides the following comments to the DEIS for the Airspace Training Initiative, Shaw AFB, South Carolina. AOPA opposes the expansion of the Bulldog A Military Operations Area (MOA), the creation of the Gamecock E MOA in relation to the raised ceiling of the Poinsett MOA, and the creation of the Gamecock F MOA as detailed in the proposed action. While Alternative B mitigates some of AOPA's concerns, additional modifications are needed to fully address the impacts of the proposed airspace initiative on general aviation (GA).

### **Proposed Alternative Impacts on General Aviation**

The expansion of the Bulldog A MOA to the lateral boundary of the Bulldog B MOA will have a major impact on three public-use airports, two hospital heliports, two private-use airports, eight instrument approach procedures, and one Victor airway. In fact, expanding the Bulldog A MOA will restrict access for Instrument Flight Rules (IFR) traffic any time the MOA is active.

The creation of the Gamecock E MOA will have a significant impact if the Poinsett MOA and Gamecock E are activated simultaneously. Though the proposal did not address this situation, the potential for a major impact to V3-157 exists. With only one MOA active at a time, V3-157 is still somewhat usable and there is enough airspace for a Visual Flight Rules (VFR) transition. However, if both MOAs are activated simultaneously, V3-157 becomes unusable for IFR operations and further compresses VFR traffic along this prominent airway. Pilots operating in this compressed area will be forced to fly in an active MOA and face a potentially hazardous situation, or be forced to traverse around the large amount of Special-Use Airspace (SUA) by flying an additional 75 nautical miles, adding time and expense to their flight.

Finally, AOPA is strongly opposed to the creation of the Gamecock F MOA. Not only would the MOA impact operations to and from Williamsburg Regional Airport (CKI) while further affecting traffic to southeast South Carolina, it would also shut down V437. Combined with the impacts resulting from creation of the Gamecock E MOA, shutting down two prominent airways creates a significant burden on both VFR and IFR operations.

### **Alternative B Impacts on General Aviation**

Alternative B mitigates some of the airspace concerns associated with the proposed alternative, but additional modifications are needed to fully address the impacts on the user community. If the FAA would lower the floor of the Bulldog B MOA to 3,000 ft MSL it would significantly reduce the impact to VFR traffic operating in northeast Georgia, as opposed to 500 AGL sought in the proposed alternative. However, there would still be a significant impact to IFR operations along V70. Considering the thousands of square miles of low altitude airspace already utilized by Shaw AFB in the Bulldog A and Gamecock C MOAs, and the fact that aircraft will not be dropping flares or chaff below 5,000 ft, there appears to be a lack of justification for requesting a floor of 3,000 ft. AOPA recommends the floor of Bulldog B MOA be limited to 7,000 ft MSL to allow access to V70.

Raising the ceiling of the Poinsett MOA is also a major concern if the proposed Gamecock E MOA is activated at the same time, as discussed above. AOPA recommends that Shaw AFB institute operational procedures restricting simultaneous use of Poinsett and Gamecock E MOAs to address the concerns with VFR traffic compression and allow access to V3-157.

In addition, AOPA believes a lower floor as proposed for the Gamecock D MOA is unnecessary considering the current air traffic control (ATC) agreement with Shaw AFB to not operate lower than 12,000 ft MSL. As stated in the DEIS, Shaw does not intend to pursue a lower operating altitude with ATC; therefore, lowering the floor of the MOA to 8,000 ft MSL is unwarranted.

AOPA appreciates the opportunity to comment on the proposal and recognizes the importance of providing the military services sufficient SUA to maintain a high level of military preparedness. We look forward to working with the Air Force to help mitigate the safety and access issues related to the Shaw Air Force Base Airspace Training Initiative.

Sincerely,



Heidi J. Williams  
Director  
Air Traffic Services