



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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March 7, 2005

Mr. Jon Scudder, 3 WG/PA
Environmental Community Relations Coordinator
10480 22nd St. #118
Elmendorf AFB, AK 99506-2500

RE: Draft Environmental Assessment, C-17 Flight Training Areas, Elmendorf Air Force Base

Dear Mr. Scudder;

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 general aviation pilots, submits the following comments in response to the Draft Environmental Assessment (DEA), C-17 Flight Training Areas near Elmendorf Air Force Base in Alaska. AOPA is particularly concerned that the Air Force has failed to fully evaluate the impacts to flight safety new C-17 operations may have on general aviation air traffic operating in Alaska.

AOPA contends that the Air Force needs to fully analyze the flight safety risks associated with mixing C-17s with small general aviation aircraft in the Environmental Assessment (EA). A mix of slower, light general aviation aircraft with faster, heavier C-17s in military training areas, such as the military training routes (MTRs), slow-speed routes (SRs) (Figure 3.4, page 3-41), and in low altitude tactical navigation areas (LATNs) constitutes a hazard to general aviation aircraft. AOPA is specifically concerned about the SRs in the Susitna Valley between Anchorage and Talkeetna. The increased weight of the C-17 over the C-130 will result in an increased risk of wake turbulence. Under more normal flight regimes, jet transport category aircraft are typically only low to the ground during take off and landing phase of flights, near an airport or while operating in special use airspace (SUA).

Possible mitigation efforts that could be explored in the EA are to: (a) provide all military activity schedules for the various training routes to the FAA Flight Service Stations serving the Susitna Valley, (b) publish the Slow-Speed routes used so civil pilots are made aware of these activities and, (c) work with the FAA to provide a common traffic advisory frequency and require C-17 to monitor and communicate with civil pilots when using these routes.

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AOPA appreciates the opportunity to provide these comments and we look forward to the opportunity to work with the Air Force to ensure that all potential flight safety impacts are addressed.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Kahl", written in a cursive style.

Ryan Kahl
Government Analyst
Air Traffic, Regulatory, and Certification Policy