



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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March 8, 2006

Mr. Doug Graham
FAA Environmental Specialist
FAA Oklahoma Spaceport EA
c/o ICF Consulting
9300 Lee Highway
Fairfax, VA 22031

Dear Mr. Graham,

The Aircraft Owners and Pilots Association (AOPA), on behalf of more than 406,000 members nationwide, submits the following comments regarding the environmental assessment (EA) for the proposed Oklahoma Spaceport, to be located at Clinton-Sherman Municipal Airport (CSM) in Burns Flat, Oklahoma. While AOPA supports the advancement of the commercial space industry, full consideration must be given to the impact commercial space operations will have on general aviation operations within the National Airspace System (NAS). In addition, AOPA contends that the establishment of commercial spaceports and subsequent commercial space launches must not require temporary or permanent flight restrictions for any portion of their operation.

Commercial space launches in the National Airspace System

Safety is paramount and must be the primary consideration with regard to integration of commercial space operations into the NAS. AOPA recognizes the Federal Aviation Administration (FAA) has a congressional mandate to ensure that commercial space launches provide a sufficient level of safety for all users of the NAS. However, this mandate does not justify or require temporary or permanent flight restrictions.

AOPA encourages the FAA to form a working group to examine ways in which commercial space transportation can occur seamlessly within the NAS. Considering a majority of the proposed launch vehicles will simply be altered versions of certified aircraft, the FAA should reasonably be able to provide standard separation services for non-participating aircraft.

The Oklahoma Spaceport EA

AOPA is very concerned the draft EA for the Oklahoma Spaceport does not adequately assess the impacts that commercial space launches from Burns Flat will have on general aviation flight operations. While a number of potential impacts are identified in the draft EA, the study does not reveal how those impacts will affect general aviation flight

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operations at CSM or within the State of Oklahoma. For example, page 4-13 says “transporting the vehicle and vehicle components to the CSIA could have the potential to impact airspace if this activity were accomplished using aircraft.” The draft EA provides no subsequent explanation on how often this operation is expected to occur, what impacts this will have on the NAS and airspace users or how the FAA will mitigate the impacts. In addition, the draft EA mentions temporary flight restrictions may be implemented during launches and recoveries from the Oklahoma Spaceport, but does not address the impacts associated with those restrictions.

According to the draft EA, the launch corridors have been designed around jet routes, but there is no analysis of the impacts to Victor Airways or popular Visual Flight Rules (VFR) transition routes associated with the launch. The northwest and southwest corridors that have been proposed for the commercial space launches have the potential to impact over 16 Victor Airways and restrict all east-west transitions through the State of Oklahoma when coupled with the surrounding special-use airspace. These corridors are by de facto, large airspace restrictions that potentially prohibit access to the rest of the NAS for aircraft based in and around the proposed Oklahoma Spaceport. A complete assessment of the impacts on all airspace routes, both VFR and Instrument Flight Rules (IFR) routes, must be incorporated in the final EA before full consideration is given to the establishment of the commercial spaceport at CSM.

AOPA contends that the large amount of ambiguity that exists in the draft EA must be eliminated, and the FAA must fully examine the impacts of the proposed spaceport establishment on general aviation operations. In the draft EA, the FAA does not assume to even know the anticipated flight mission at the Oklahoma Spaceport (described on page 4-14). The full impact to the NAS cannot be analyzed without detailed knowledge and an explanation of the anticipated launch mission.

AOPA appreciates the opportunity to provide comments on the draft EA for the Oklahoma Spaceport. Prior to the establishment of the Oklahoma or any other commercial spaceport, we strongly encourage the FAA to fully examine all of the associated impacts of commercial space launches on general aviation operations and describe and analyze those impacts in the final EA.

Sincerely,



Heidi Williams
Director
Air Traffic Services