



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

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F-35A Pacific Operational Basing EIS
354 Fighter Wing Public Affairs Office
354 Broadway Avenue, Suite 15A
Eielson AFB, AK 99702

Re: Draft Environmental Impact Statement (EIS) for F-35A Operational Beddown – Pacific

To whom it may concern,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submit the following comments in response to the Draft Environmental Impact Statement (EIS), F-35A Operational Beddown – Pacific. Although AOPA supports the United States Air Force (USAF) and the mission of the F-35, it is important that the USAF consider general aviation air traffic near Eielson Air Force Base (PAEI) and in the Joint Pacific Range Complex (JPARC) Special Use Airspace (SUA) in determining how operations will be safely conducted.

Robust SUAIS

The Draft EIS states up to 54 F-35A aircraft will be based at PAEI. The increase in based aircraft is estimated to result in a 40% increase in utilization of the JPARC airspace. It is important that activation of any SUA take place in accordance with the operation times listed on the sectional chart and/or by NOTAM well in advance.

The radio and telephone service known as the Special Use Airspace Information Service (SUAIS) provided by Eielson Range Control needs to be enhanced and expanded to accommodate the proposed 40% increase in use of airspace in the northern portion of the JPARC. The current radio communications infrastructure doesn't provide adequate radio coverage in the northern and eastern edges of the existing Military Operations Areas (MOAs), nor at lower altitudes in the proposed expanded Fox and Paxon MOAs south of the Alaska Range. Higher power repeaters are needed to support the broadcast of the tape-recorded message used during evenings and weekends to provide status information.

While the Draft EIS suggests that civil pilots are increasingly avoiding MOAs, it has become unavoidable due to their large and ever expanding size that pilots must fly through them during periods of activation. The Draft EIS notes "no midair collisions and few reported near misses have occurred within the existing JPARC airspace." It is important that as the USAF increases their flight activities that they continue to operate with the expectation that non-participating aircraft will fly through the airspace. Informing non-participating pilots is very important to ensuring they are aware of the status of the airspace so that they can plan accordingly. A two-way communication system ensures military aircraft have increased situational awareness of civil traffic operating in the MOAs while they are activated as well.

Retaining Access with Minimal Delay

The increased activity by F-35 aircraft in the northern portion of the JPARC also limits IFR access to communities underneath or adjacent to MOA airspace. Today local operators are able to coordinate through the Range Control to gain limited IFR access. Agreements have been made with local operators to provide priority access for medivac flights that need to cross the MOA complex to transport patients for medical treatment to hospitals in Fairbanks or Anchorage. AOPA believes that the process should be modified so that IFR users are able to obtain clearances with minimum delay through air traffic control. There should be a standard procedure in effect that covers all users, not just emergency and lifeguard traffic, especially during the routine training times that are outside the Major Force Exercise (MFE) activities, like Red Flag. These procedures need to be documented between the FAA and military, to avoid loss of continuity as staff turn-over occurs both in military and civil organizations.

Military Training Routes

The increased utilization of Military Training Routes (MTR) poses a hazard to general aviation aircraft due to the speeds at which fighter jets fly and because they would be flying through the same airspace primarily utilized by smaller VFR aircraft. The sparse nature of FAA radio coverage in Alaska makes it impractical for civil aircraft to receive inflight information from Flight Service regarding the status of MTRs in many parts of the state. Consideration should be given to exploring additional ways to communicate MTR use to civil aviators to mitigate the danger of a collision. The establishment of any additional routes or SUA should only take place through a collaborative process involving all users of the national airspace system.

Conclusion

The AOPA understands and supports the USAF's need to train in order to have the readiness to support the national defense. We believe with augmentation of the infrastructure to support communications with civil aircraft, and improved procedures to provide IFR access during non-MFE periods, this training can be done in a manner that will not cause an undue negative impact on general aviation.

Thank you for the opportunity to comment on this important issue.

Sincerely,



Rune Duke
Director, Airspace and Air Traffic

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members and establish, maintain and articulate positions of leadership to promote the economy, safety, utility and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization the world.