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February 10, 2016

Kevin Marek  
NGB/A7AM  
Shepperd Hall  
3501 Fetchet Avenue  
Joint Base Andrews, MD 20762-5157

Re: Draft Environmental Assessment for Proposed Volk Field Special Activity Airspace Modification and Establishment

Dear Mr. Marek,

The Aircraft Owners and Pilots Association (AOPA), representing over 300,000 members nationwide, submit the following comments to the National Guard Bureau (NGB) in regards to the Draft Environmental Assessment (DEA) for the proposed modification and establishment of Special Use Airspace (SUA) at Volk Field, Wisconsin. AOPA is appreciative of the outreach, public meetings, and collaboration that the local military proponent has engaged in with the general aviation community over this proposal's eight year history; however, the proposal misses several opportunities to mitigate the negative impacts to general aviation that would result. AOPA contends the new and redesigned SUA would result in air traffic delays, negative economic impacts, and restrictions in airport access unless modified. Please find below our proposed mitigations to these negative impacts that should be incorporated in the final design of the SUA.

### **Large SUA Complexes Impact on General Aviation**

The proliferation of large contiguous SUA complexes is posing a threat to the overall utility of the National Airspace System (NAS). Large areas of SUA can create substantial barriers to the freedom of movement from one area to another. These complexes, like the recent proposals at Twenty-nine Palms, Powder River, and JPARC, deserve additional scrutiny based on the barriers they can create when activated in whole. The establishment of these areas must be scrutinized for national, regional, and local impacts.

It is important to note that those most impacted by the Volk SUA is general aviation as demonstrated by Table 3-2. Based on the altitude utilized by the operators, it is clear this is not airline traffic frequently transiting the existing SUA. AOPA finds the "Current Airspace Limitations" section flawed as it frequently lists "commercial traffic" as a primary restrictor. It is important this proposal's impact on general aviation is fully considered and so it is necessary general aviation also be listed as a limiter. AOPA believes the omitting of general aviation in this section gives the false impression that general aviation is not present in this area or impacted.

General aviation is a primary means of travel, business, medical evacuation, and access, among others, for many people in northern Wisconsin. The size of the entire SUA complex spans nearly

the entire state, east to west, which when activated can result in significant delays to IFR general aviation traffic. Those aircraft unable to fly over these MOAs must instead either fly around or go below 8,000 feet MSL so as to pass under the Volk East MOA. The need to fly at lower altitudes can increase fuel requirements and flight time, and be inefficient for high performance aircraft.

### **Volk Falls, West, and South MOA**

The proposal is encouraging as the modifications would allow for better scheduling of existing SUA. This will have a positive impact as only the necessary areas will be activated and thus large areas not utilized by the military proponent will not be unnecessarily unavailable to IFR aircraft. The activation of several adjoining pieces should be avoided due to the impacts they create except when operationally critical.

Considering the SUA, in part, will be activated daily, AOPA believes the NGB should consider the opportunity of subdividing the airspace so as to create Low MOAs and High MOAs under the Volk Falls, West, and South MOAs. Subdividing large SUA by altitude has been successful in other large SUA complexes, such as Powder River, by allowing efficient air traffic control recall of the Low MOAs in order for general aviation to transit the area or complete an instrument approach at an underlying or adjacent airfield. The DEA notes aircrews spend minimal time below 5,000 feet AGL (16%) and even less time below 1,000 feet AGL (4%).

AOPA proposes that the Low MOA extend from 500 feet AGL to 5,999 feet MSL, and the High MOA extend from 6,000 feet MSL to 17,999 feet MSL. These altitudes would also provide relief for the highly trafficked V-345 airway. The Minimum Enroute Altitude for V-345 is 3,500 feet MSL so the enactment of a Low MOA would allow this airway to be open much more of the time as compared to what would otherwise occur should this airspace remain one block altitude.

As military utilization of the lower altitudes is limited, AOPA believes it should be of little impact to operations, pilot's mental resources, or to air traffic by subdividing the airspace by altitude. The Low MOA would be scheduled and activated as required by the proponent. Subdivision would also offer the benefit of the Low MOA being utilized first, such as at the beginning of a training sortie, and then quickly released back to air traffic for IFR civil aviation utilization.

### **Impact to Highly Trafficked Airway and Instrument Approach Procedures**

The utilization of the V-345 airway through the Volk Falls, West, and South MOA is clearly the most trafficked IFR route impacted by the SUA, as shown by Table 3-3. This route is impacted by the new Restricted Area and all three MOAs. The activation of any one of those four SUA areas could result in this route being unusable and force inefficient reroutes.

To mitigate this impact, AOPA proposes the military proponent collaborate with the FAA on the enactment of a T-route that would skirt the south side of the complex and which could be utilized at any time. The proposed route would begin at Dells VORTAC (DLL) and proceed direct to join the V-129 airway, while remaining south of R-6901B. A new fix would need to be created along V-129 in the proximity of 441315N0912814W. This new route would be at minimal cost to the

government but could be financially impactful for civil pilots who must pay for the increased flight time needed to circumnavigate the SUA.

Additionally, the NGB should modify the dimensions of R-6904C so that the southern boundary will not impact instrument approach procedures at Bloyer Field Airport (Y72) or V-345. Amending the southern boundary so as to be 5 NMs further north would reduce the impact this area would have on civil traffic transiting and arriving the area.

The DEA discusses the mitigation put in place for Marshfield Municipal Airport (MFI) as far as pilots retaining access to the instrument approach procedures with minimal delay; however, it does not discuss the existing five airports that have their instrument approach procedures impacted. We believe this issue is within the scope of the DEA as the proposal involves reorganization of existing SUA. These five airports should be added, if not already listed, to the existing Letter of Agreement with Minneapolis ARTCC so that the airspace can be recalled in short order should civil aviation need access in instrument meteorological conditions. This issue would also be considerably mitigated by the altitude subdivision of the Volk Falls, West, and South MOA.

Listed below are the five impacted airports and the pertinent instrument approach procedures:

- Necedah Airport (DAF): RNAV (GPS) RWY 36, Volk South MOA
- Mauston-New Lisbon Union Airport (82C): RNAV (GPS) RWY 14 and RNAV (GPS) RWY 32, Volk South MOA
- Black River Falls Area Airport (BCK): RNAV (GPS) RWY 08 and RNAV (GPS) RWY 26, Volk Falls MOA
- Neillsville Municipal Airport (VIQ): RNAV (GPS) RWY 10, RNAV (GPS) RWY 28, and NDB RWY 28, Volk Falls MOA
- Bloyer Field Airport (Y72): RNAV (GPS) RWY 07 and RNAV (GPS) RWY 25, Volk South MOA

It is important that the local procedures put in place to reduce impacts to civil aviation be publicized and included in the information published by the military proponent. It is important the internal procedures listed in the Letter of Agreement are advertised or else pilots will be unaware and may unnecessarily delay their flight.

### **Volk East MOA**

The permanent incorporation of the Lightning Temporary MOA area is not fully explained. Historically this area has been utilized less than two weeks per year. In fact, this year's proposal for activation is for only 12 days which does not appear to warrant permanent charting. AOPA does not consider activation 3% of the year to be regular use in accordance with FAAO 7400.2, Procedures for Handling Airspace Matters. The military proponent should provide a more detailed explanation of why this area is necessary for regular use and for more than just the limited Large Force Exercises it has been used for in the past, or reduce the proposed expansion of Volk East MOA.

## **Economic Impact**

Wisconsin airports provide a large contribution to the State economy per the Wisconsin Department of Transportation, Bureau of Aeronautics. The 2010 *Economic Significance study of the Aviation Industry in Wisconsin* revealed there were 90 general aviation public-use airports and 423 private airports in Wisconsin. When the report was written there were approximately 3,000 general aviation aircraft based at the general aviation public-use airports and an additional 600 located at eight commercial airports in the state.

The 2010 report revealed all public-use general aviation airports in the state contributed more than \$694 million, which was also an underestimation by their admission. Thousands of jobs in the state and many aviation and non-aviation businesses rely on the millions of dollars that are spent by those who fly in to the smaller airports of Wisconsin from elsewhere.

The enlargement of the Volk SUA complex could have a negative impact on the smaller general aviation airports in northern Wisconsin which rely on accessibility. Although AOPA encourages members to educate themselves on how to safely navigate through MOA airspace, we know from a previous survey that 73% of general aviation pilots deviated around SUA. A survey taken in 2005 revealed that 68% of general aviation pilots deviate around SUA whether activated or not. Fixed Base Operator's rely heavily on fuel sales and, should fewer pilots stop in because they are avoiding the MOA, their revenue could drop dramatically. Making it harder for visitors to fly to these smaller airports could hurt not only the airports but also the local economy.

The military proponent must continue to do outreach and participate in education opportunities to help dispel the misconceptions regarding SUA.

The Experimental Aircraft Association hosted AirVenture that occurs annually at Wittman Regional Airport (OSH) in Oshkosh has an economic impact of over \$110 million each year. It is important that the military proponent continue to not schedule their SUA during the Oshkosh event and several days on either side.

## **Times of Use and Charting**

The MOA's change in times of use from "Intermittent by NOTAM 0800-1600 Tuesday-Saturday; other times by NOTAM" to "Intermittent by NOTAM at least 2 hours in advance" is a significant improvement and commitment to providing civil pilots advanced notice of SUA activity. However, two hours does not allow adequate notice for flight planning as a pilot could take off and find out enroute a MOA has made his airway unavailable. The pilot may be forced to fly at a lower altitude that could have adverse winds or force him to circumnavigate a very large amount of SUA. A fuel stop may even become necessary. Increasing the required notice for all proposed and current SUA to be active should be a minimum of 4 hours advanced notice given the fuel endurance of modern aircraft.

Any change in airspace configuration must coincide with the VFR charting cycles to ensure the flying public is aware of the change. Safety could be significantly impacted should the airspace change be made before the change is charted and widely disseminated to pilots.

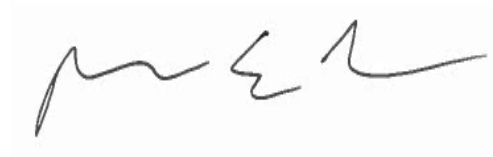
## Conclusion and Recommendations

For the reasons stated above, AOPA believes the proposal outlined in the DEA should be modified to reduce the adverse impacts on general aviation. We believe measures should be taken by the NGB to adequately accommodate civil aviation and preserve the airspace accessibility in regards to their final determination.

AOPA understands and supports the Wisconsin Air National Guard's need to train in order to have the readiness to support the national defense. We believe this training can be done in a manner that will not cause an undue negative effect on general aviation. AOPA remains committed to participating in collaboration opportunities with military agencies.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Rune Duke', is written over a light gray rectangular background.

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.