



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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August 6, 2002

Attn: Ms. Kelly Knight  
Atlantic Division, NAVFACENCOM  
1510 Gilbert St., Code BD33KK  
Norfolk, VA 23511-2699

Dear Ms. Knight:

The Aircraft Owners and Pilots Association (AOPA), representing the interests of over 380,000 aviation enthusiasts and professionals nationwide, opposes the proposed airspace actions outlined in the Navy's *Environmental Assessment (EA) for Proposed Military Operations Areas in Eastern North Carolina*. While AOPA recognizes that a strong national defense is predicated on the proper training of our armed forces, the creation of additional special use airspace (SUA) throughout a region inundated with restricted and military operations areas (MOAs) would have a profoundly negative impact on the general aviation community. As a result, AOPA recommends that the U.S. Navy adopt the no action alternative identified in this study.

The following sections outline the impacts to the general aviation community as they relate to each alternative.

### **Core and Mattamuskeet MOA Alternative**

Identified as the preferred alternative in this EA, the creation of both the Core and Mattamuskeet MOAs would have a dramatic impact on the safe and efficient use of airspace by civilian pilots. The impact of each MOA, along with the cumulative effects of their creation, are discussed in greater detail below.

### **Core and Cherry MOA Alternative**

Similar to the Core and Mattamuskeet alternative, this option also calls for the establishment of two MOAs. Again, the impact of each MOA, along with the cumulative effects of these airspace actions, are discussed in greater detail below.



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### **Core MOA Alternative**

This alternative creates significant difficulties for pilots operating under Visual Flight Rules (VFR). The proposed MOA would overlie much of the Cape Lookout National Seashore. Paragraph 7-4-6 (b) of the Aeronautical Information Manual states in part "Pilots are requested to maintain a minimum altitude of 2,000 feet above the surface of the following: National Parks, Monuments, Seashores..." Given that the floor of the proposed Core MOA would be at 3,000 feet mean sea level (msl), this would compress northeast/southwest-bound traffic into an altitude stratum of less than 1,000 feet.

In addition to increasing the possibility of mid-air collisions between non-participating traffic, pilots must also contend with the degradation in safety created by over-water flights at lower altitudes. Currently, a pilot may fly along the Outer Banks north of Cape Lookout at altitudes up to 8,000 feet msl without entering special use airspace (the floor of the Pamlico A and B MOAs begins at 8,000 feet msl). Operating at significantly lower altitudes dramatically reduces the power-off gliding distance for pilots, should they experience engine failure. Moreover, with limitations in radar coverage, pilots who are driven to lower altitudes will be unable to take full advantage of air traffic services. In short, the Core MOA would reduce the levels of safety and flexibility enjoyed by airspace users in this region.

### **Mattamuskeet MOA Alternative**

While this alternative would consolidate several SUA complexes, the impacts to transient VFR operations are severe. Again, much of the proposed airspace would overlie national wildlife areas. This would create traffic impacts similar to those outlined in the Core MOA analysis (see above). The proposed floor of 3,000 feet msl would also deprive pilots flying eastbound toward the Outer Banks of the opportunity to make a steady and efficient climb to altitudes necessary to safely conduct an extended over-water flight. For westbound pilots, the impact is equally great. The only options available are to begin a premature descent in order to fly under the floor of the proposed Mattamuskeet MOA, or conduct a prolonged circling descent before proceeding on course.

Pilots who would choose to operate in this proposed MOA would face an additional challenge, a lack of radar coverage. Radar coverage at lower altitudes in this region could best be described as poor, and neither Washington Center, Cherry Point Approach Control, nor Norfolk Approach Control has radar equipment sufficient to provide the necessary coverage at lower altitudes. Moreover, if general aviation traffic were compressed into a narrower altitude stratum below the proposed airspace, there will be no primary radar coverage. This would create a significant reduction in safety for civil aviators.



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As a result, this new airspace would severely restrict access to two Outer Banks airports, Ocracoke (W95) and Hatteras/Billy Mitchell (HSE). Access to Hyde County (7W6) would also be reduced. Given public policy comments in the State of North Carolina intended to increase tourism and travel dollars coming into the region, the reduction in air traffic is a significant economic issue. Combined, the three airports cited generated \$1,100,000 in expenditures, 31 jobs, and over 8,000 visitors for their region in 1995, the most recent year studied (Economic Impact of Publicly Owned Airports in North Carolina, NCDOT Division of Aviation and UNC Charlotte, 1996).

### **Cherry MOA Alternative**

Although the floor of the proposed Cherry MOA would be 3,000 feet msl, pilots who wish to avoid special use airspace may face either increased flight times, or reduced operational flexibility. If a pilot wishes to operate above 3,000 feet msl and avoid special use airspace, they can expect an increase in both flight time and distance of approximately 10% for north/south flights (average based on flights of approximately 50-60 nautical miles). For east/west flights, the increase will likely be more dramatic. In some cases, pilots may expect an additional 12-20% increase in flight times for flights above 3,000 feet msl outside of the proposed Cherry MOA.

IFR operations would also be impacted by the creation of the Cherry MOA. The utility of the V139 airway would be impacted during periods when Cherry MOA is active. This will also serve to disrupt IFR operations into Craven County Regional Airport (EWN). Craven County hosts over 500 approach operations per year.

### **Cumulative Effects**

The impacts of each alternative, when considered independently, make a compelling case against the establishment of new special use airspace. However, when viewed in the context of existing airspace, it is clear that any of the alternatives listed would create a significant adverse impact to general aviation.

The establishment of the Core MOA would severely limit flights along the Outer Banks southwest of Ocracoke Island. With Restricted Area R-5306A to the northwest, and Warning Area W-122 to the southeast, Core MOA would significantly limit the only remaining corridor for flights through this region. This would not only serve to further isolate Smith (Beaufort) Airport (MRH), but would also limit southbound transition routes for airports such as Ocracoke Island (W95), Billy Mitchell (HSE), Hyde County (7W6), Dare County Regional (MQI), and First Flight (FFA) airports. Collectively, these airports host over 140,000 operations per year. Together with the Mattamuskeet MOA's projected impact on W95, HSE, and 7W6, these are impacts worthy of consideration.

Similarly, the Mattamuskeet MOA would close an important flyway between two restricted areas. The R-5314 complex and R-5306A Restricted Areas combined limit the access pilots have to and from the Outer Banks along nearly 50 miles of shoreline.



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The airspace between these areas, combined with the 8,000-foot floor of the Pamlico A and B MOAs, gives general aviation pilots important access to a valuable national resource. When you consider that general aviation provides an important link for many residents and travelers to and from the Outer Banks, this is an impact that cannot be ignored.

The proposed Cherry MOA, when combined with the existing R-5306A complex, also creates a situation whereby many civil pilots would be required to fly longer, circuitous routes or face altitude restrictions. This too is a major impediment to general aviation pilots.

### **Conclusion**

While pilots may legally operate within a MOA under visual flight rules (VFR), it is important to note that having both military and non-participating aircraft sharing the same airspace places additional demands on pilots. For many within the general aviation community, the new special use airspace would serve as a de facto restriction, thus limiting the safe and efficient use of airspace. The addition of the Core and Mattamuskeet MOAs would have unavoidable adverse effects on the civil aviation community. Access to airspace would be reduced, resulting in profound socioeconomic impacts that include; increased flight times, increased operating costs, reduced flexibility, and further limiting both commerce to this region and free transit to and from a valued national resource.

When you combine the effects of proposed and existing SUA, increased military flight operations, and limitations in radar coverage that preclude real-time airspace management throughout the region, it becomes clear that the proposed action alternatives are not in the best interest of general aviation pilots. As a result, AOPA strongly asserts that the “no action” alternative serves the best interest of airspace users in North Carolina.

Respectfully,

Michael W. Brown  
Associate Director  
Air Traffic, Regulatory, and Certification Policy

Cc: Mr. Reginald Matthews, ATA-400  
Mr. Paul Gallant, ATA-400  
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