



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • FAX (301) 695-2375
www.aopa.org

February 14, 2005

Ms. Brenda Cook
HQ ACC/CEVP
129 Andrews St., Ste. 102
Langley AFB, VA 23665-2769

RE: Draft Environmental Impact Statement for the New Mexico Training Range Initiative

Dear Ms. Cook;

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 general aviation pilots, submits the following comments in response to the Draft Environmental Impact Statement (DEIS) for the New Mexico Training Range Initiative (NMTRI). AOPA opposes the Capitan Military Operations Area (MOA) in light of the significant negative impacts on Visual Flight Rules (VFR) and Instrument Flight Rules (IFR) traffic transiting the area between Roswell, New Mexico and points northwest. AOPA contends that the Air Force has failed to analyze the flight safety impacts to general aviation associated with lowering the floor for supersonic operations from 30,000 feet MSL to 10,000 feet MSL and the impacts associated with expanding a lights-out approved MOA.

AOPA's 2003 Policy and Issue Survey of its members shows that a full 73% of the general aviation pilot population deviates around MOAs, in part because of the inability to get accurate "real-time" status information on that airspace. In fact, our members ranked the ability to receive "real-time" status of Special Use Airspace (SUA) as its second most important airspace issue facing general aviation. Deviations around the expanded SUA complex will more than triple flying time and in turn economically impact operators who are forced to more than triple operating costs to avoid the airspace area.

Impacts on General Aviation

AOPA is particularly concerned the DEIS failed to adequately evaluate several aeronautical impacts associated with the proposed SUA initiative. The expansion of the Pecos South High and Low MOAs will eliminate access to V291 and the creation of the new Capitan MOA will compress traffic into a narrow 3,500 feet corridor along V68-83. In effect, a small portion of V68-83 below 12,500 feet would remain as the only airway available for IFR transitions around an SUA complex encompassing nearly 3,300 square miles.

As part of the NMTRI the Air Force is also proposing to authorize supersonic flight below the current 30,000 feet MSL floor. The proposed changes would allow supersonic flight down to 10,000 feet MSL, or approximately 5,000 to 6,000 feet AGL in the expanded and existing SUA, including the new Capitan MOA. AOPA is gravely concerned with the potential impacts to flight safety if general aviation air traffic is forced to “see-and-avoid” F-16’s maneuvering at supersonic airspeeds. Such a situation presents undeniable risks to flight safety for both military and general aviation pilots. The DEIS failed to address the critical impacts to flight safety if nonparticipating air traffic occupy the same airspace as maneuvering supersonic military aircraft. Furthermore, the Pecos MOA complex is approved for lights-out military training and the DEIS failed to address the impacts to flight safety the expanded lights-out approved MOA would impose upon nonparticipating aircraft transitioning the airspace.

AOPA Recommendations

AOPA strongly recommends the final EIS address and analyze the following items:

- Impacts to flight safety directly related to civil aircraft operating “see and avoid” in the same airspace as maneuvering supersonic military aircraft.
- Impacts to civil aviation flight safety as a result of increasing the size of lights-out approved MOAs.

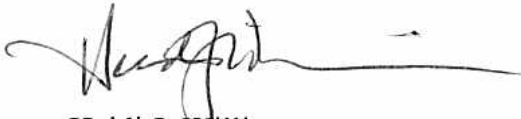
AOPA understands the Melrose Air Force Range (AFR) is one of few ranges approved for training with the Joint Direct Attack Munitions (JDAM) and the Advanced Medium-Range Air-to-Air Missile (AMRAAM) weapons systems. However, the intended military operations in this particular SUA complex present several additional hazards to nonparticipating aircraft that are not present in most MOAs. Therefore, a proper analysis of the potential impacts to flight safety must be fully addressed to ensure the safety of civilian pilots will not be jeopardized by the proposed action.

Considering the impacts to airways V68-83 and V291, the hazardous lower supersonic operations, expanded lights-out operations in the Pecos MOAs, combined with the lack of real-time status information, AOPO recommends Alternative B as analyzed in the DEIS. Alternative B would allow expansion of the Pecos High and Low MOAs, however it would not create the Capitan MOA/ATCAA. Alternative B provides civil pilots the available option to efficiently deviate around the expanded SUA complex without creating additional flight safety concerns associated with the creation of the Capitan MOA.

Ms. Cook
Page 3
February 14, 2005

AOPA appreciates the opportunity to comment on the DEIS for the NMTRI and looks forward to working with the Air Force to help mitigate potential airspace impacts associated with the NMTRI.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams", with a long horizontal flourish extending to the right.

Heidi J. Williams
Director
Air Traffic Services