

APPENDIX K

Response to Public Comments

K.1 Introduction

This section presents the United States Air Force's (USAF) response to comments received on the Draft Environmental Assessment of Improvements to Military Training Routes in Alaska (Draft EA).

The public comment period began June 23, 2005 and ended on July 29, 2005. The Notice of Availability (NOA) of the Draft EA was published in local and regional papers, including the Anchorage Daily News, the Fairbanks Daily News-Miner, and the Bristol Bay Times. The USAF distributed copies of the Draft EA to community libraries throughout the project area including the Anchorage Municipal Library, Fairbanks Public Library, and Dillingham Public Library. The document was also made available electronically on the Hoefler Consulting Group project website.

Section K.2 contains the letters that were received from the public during the comment period. The public comment letters are marked with alphanumeric codes that correspond to the comments and responses found in Section K.3. Comments received are organized and identified as follows:

- **COMM** Communication (see Section K.3.1)
- **CONT** Content (see Section K.3.2)
- **MIT** Mitigation (see Section K.3.3)
- **OPS** Operations (see Section K.3.4)
- **SAF** Safety (see Section K.3.5)

It is important to note that, for the purposes of this EA, individual responses were not prepared for every comment received during the public review period. Like comments were grouped and responses were addressed collectively, rather than individually.

A total of four letters were received during the public comment period, all of which were from civilian aviation groups. The majority of the comments made by these organizations were related to safety concerns and communications.

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K.2 Public Comments



ALASKA AIR CARRIERS ASSOCIATION

2301 Merrill Field Drive, Unit A-3
Anchorage, AK 99501
Phone: 907-277-0071
Fax: 907-277-0072

August 12, 2005

Mr. James Hostman
611 CES/CEVP
10471 20th St, Suite 302, Room 339
Elmendorf AFB, Alaska 99506-2200

Re: Draft Military Training Route EA (Alaska)

To Whom It May Concern:

The Alaska Air Carriers Association is pleased to submit the following comments on the above notice of proposed modification of existing Military Training Route (MTR) structure managed by the 11th Air Force within the State of Alaska. We appreciate the opportunity to assess potential impacts and evaluation of alternatives that could mitigate or reduce impacts to the aviation community.

The Alaska Air Carriers Association (AACAA), representing more than 77 air carriers operating in Alaska and over 72 supporting aviation businesses, does not support the proposed Draft MTR EA affecting air carriers. The carriers represented by our Association are "on demand" and scheduled air cargo and passenger carriers certificated under parts 135 or 121 of the Federal Aviation Regulations (FARs). The majority of their flying is repetitive trips on specific routes and most schedules are set by customer demand. Their companies transport a variety of cargo received directly from courier companies or customers, perform training missions, and transport passengers for medical purposes, government work, personal business or air tour operations.

Our Association represents companies upon which the United States Air Force (USAF) proposed route structure would have a direct and profound negative impact. The industry supports aviation modifications to the USAF's training environment only to the extent that it is essential to safety. With all of the existing and modified routes now capable of supporting flight operations at high speeds, low altitudes, daylight or darkness or in all weather conditions, the proposed routes fails to reach this threshold. Several of the proposed actions cut directly across currently used commercial air space.

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ALASKA AIR CARRIERS
ASSOCIATION

- Denotes executive committee

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The Alaska Air Carriers Association

Background

In June of 2005, the USAF published a Draft Military Training Route document outlining the purposed and need for the proposed action, coupled with examples/maps of changes to the current structure. Among the items addressed in the Draft was the need to maintain national security and defend the United States against attack throughout the Pacific Theater and to prepare plans, conduct operations, and coordinate activities of PACAF forces.

We acknowledged the USAF's reasons for enduring air combat and operational readiness, the ability to develop tactics/techniques of aerial warfare, and conduct training, and solicited comments from our member air carriers who fly in the current training zones. The AACA opposes this proposal because it is based mainly on the needs of the 3rd Wing and C-17 Squadron, which in our view, will not improve air traffic patterns or accommodate our Visual Flight Rules (VFR) operators.

Burden

If adopted, the proposal would eliminate routes, currently in use, without any evidence that it would enhance safety. Routes 960 and 970 will have a **significant negative impact on safety** for Fairbanks-based air carriers. Warbelow's Air Ventures alone conducts approximately 12,000 operations per year, and at least 75 percent of those would be in conflict with the proposed routes west of Fairbanks.

Although we support the military training in Alaska, we do oppose the MASR's northwest of Fairbanks. This airspace encompasses just about every route for the large number of small aircraft departing or arriving from the entire Northwest portion of the state. Low altitude high speed military aircraft are not a good mix for the number of flight operations in the proposed area.

Absence of a Safety Justification

In the preamble of the Draft EA, the USAF concluded that "All of the existing routes would have a reduction in flight operations; operations on new routes would average about 1 sortie per week." No evidence supports this statement, rather, it appears that the Air Force is actually estimating its actual use of the MTRs. In fact, with the addition of a C-17 contingent based at Elmendorf AFB, the number of sorties flown per week would increase.

We strongly object to the proposal to develop the two new MTR's proposed in this document. MTR 960 and 970 would introduce significant risk to public safety if implemented as drawn. These two MTRs run peripheral to the vast majority of civil aviation (which includes commercial aircraft) traffic that operates in and out of Fairbanks. Dozens of flights per day depart to the west, north and east of Fairbanks, crossing the proposed routes of these two MTRs, enroute to literally dozens of remote villages, whose only means of access to the other villages or a hub location are these flights on small commercial aircraft.

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Comments to Military Training Routes The Alaska Air Carriers Association

In addition to the many air taxi flights per day that travel these routes, significant and increasing flight seeing traffic travels to the north and northwest of Fairbanks on a daily basis. Several of our members take visitors from Fairbanks to glacier or wildlife viewing near the Denali National Park and Preserve, Gates of the Arctic National Park and Preserve, the Western Arctic National Parkland and the Wrangell-St. Elias National Park and Preserve. Again, all these flights run nearly perpendicular to the proposed MTR 960 and 970. Our commercial air carriers will cross over VR 960 and 970 for search and rescue or medical evacuation missions. And finally, a major volume of recreational air traffic crosses these routes on a daily basis. This is simply some of the busiest civil airspace in Alaska.

Moreover, according to the information provided, both the proposed VR 960 and VR 970 have segments as high as 1500 feet above ground level. Since both of these routes travel in mountainous or hilly terrain, this will place military aircraft right in the flight path of much, if not most of the civil air traffic traveling those heavily used routes.

The Draft EA cited several specific benefits that would ensue, however, none fully result in addressing all situations that occur in this air space. A primary reason for this proposal, according to the document is: "One identified need for the proposed action is to reduce military training in areas of high civilian airspace activity by moving MTRs to lower traffic areas". In fact, by creating VR 960 and VR 970, implementation of this proposal would place military aircraft right in the middle of the most heavily used civil airspace in northern Alaska. Not only would military aircraft be flying at high airspeeds in this very busy civil airspace, but they would be doing so nearly perpendicular to and at the same altitudes as the vast majority of the civil traffic. This would make see and avoid very difficult, if not impossible.

Solutions

Any military aircraft flying Instrument Routes (IR) under Instrument Flight Rules (IFR) must comply with Federal Aviation Administration (FAA) instructions. Air traffic is generally controlled through "see and avoid" tactics, with civilians responsible for checking with FAA prior to entering a potentially active MTR. How might civilian aviators supposed to achieve this? Military aircraft on these routes typically do not announce position or intentions on VHF frequencies and are moving at high speeds.

Air Force personnel admit that military aviators entering onto an MTR may simply transmit their intentions in the blind, and on UHF frequencies at that. Civil aircraft are not equipped with UHF radios. There is no requirement that military aviators establish two-way radio communication with the FAA prior to operating on a Visual Route. Further, even if the servicing FAA facility for that sector does receive a communication from a military aircraft indicating that it is entering an MTR, the FAA keeps no record of this transmission, and there is no dissemination of this information to civil aviators.

There are millions of acres of Alaskan real estate that are in MOA's. Why would the military need to be transiting heavily trafficked civilian airspace at high speeds and not communicating?

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AACA strongly suggests that these routes be placed in a more remote area of the state rather than the arrival and departure corridors west of Fairbanks. This proposal would impose significant new cautions when the MTR is active. In addition, the AACA believes there are other solutions to these new proposed routes to accommodate weather alternates that lie in less heavily used air space.

In an effort to promote community operations for these MTR's, we recommend the USAF take into account the AACA member operators in the Fairbanks needs rather than solely addressing operational readiness and aerial warfare tactics. Additionally, the Alaska Air Carriers Association would offer to hold a briefing session for our northern-based carriers, who traverse this air space daily to communicate your Final Military Training Route EA.

Summary

The USAF's motto is: "Uno Ab Alto" (One Over All) and cooperative excellence must prevail. These new proposals are not practical nor enhance safety.

The AACA cannot support the proposed Draft EA as it is currently written. The Association requests the USAF to:

1. Withdraw your intention of VR 960 and 970 until at least two public hearings are conducted;
2. Or, limit usage of VR 960 and 970 to certain times/days of the week;
3. Based upon the comments received on this Draft EA and from the public hearings, issue another document on proposed modifications.

We commend the USAF for providing the public with an opportunity to comment on the MTR structure. Thank you for considering our views. Please contact Karen E. Casanovas, Executive Director for the Alaska Air Carriers Association via e-mail karen@alaskaaircarriers.org or at 907-277-0071 if you have any questions or require additional information.

Sincerely,



Karen E. Casanovas
Executive Director

cc: Board of Directors (AACA)



Alaskan Aviation Safety Foundation

2811 Merrill Field Dr
Anchorage, AK 99501

August 8, 2005

Mr. James Hostman
611 CES/CEVP
10471 20th St, Suite 302, Room 339
Elmendorf AFB, Alaska 99506-2200

Dear Mr. Hostman:

We have reviewed the "Draft Environmental Assessment of Alaska Military Training Routes (June 2005)", and offer the following general and specific comments:

1) The Draft EA states that actual usage of MTRs in Alaska will decrease ("All of the existing routes would have a reduction in flight operations; operations on new routes would average about 1 sortie per week."). This does not, in fact, appear to be the case. Rather, it appears that the Air Force is simply more realistically estimating its actual use of the MTRs. In fact, with the addition of a C-17 contingent based at Elmendorf AFB, one task of which will be to provide air mobility to the 172nd Stryker Brigade based at Ft. Wainwright, it is entirely possible that actual usage levels of MTR's in northern Alaska could increase slightly.

The Draft document should not suggest that actual use levels are going to decrease unless that is in fact true. From the figures given and statements in other parts of the document, it appears that the military is simply correcting its previous estimates. To help evaluate the impact of the current proposal, we request that the Air Force include actual usage over the past five years on an individual route basis.

2) It is apparent that previous estimates (from the 1990's) of military aircraft usage of military training routes (MTR) in Alaska were significantly overstated. The subject proposal seeks to correct those estimates to lower levels of authorized use. We wholeheartedly support this reduction in proposed levels of use.

3) We also support the Air Force's decision to re-route the portion of VR 937 which is currently routed through Isabel Pass. Routing MTRs in proximity to busy VFR civil corridors should be avoided. This change should help to reduce some potential conflicts.

4) We appreciate the fact that the Air Force has made a significant effort to remove conflicts early on by consulting with landowners along proposed routes. Unfortunately, the Air Force did not elect to take the same approach with the civil aviation community. While briefings were presented to the ACMAC group, no formal feedback was sought from that group or from the aviation community in general. While there is no legal requirement for the military to consult with civil aviators and seek their input, we believe that a better product would be achieved if similar consultation is conducted.

5) We strongly object to the proposal to develop the two new MTR's proposed in this document. MTR 960 and 970 would introduce significant risk to public safety if implemented as drawn. These two MTRs run tangential to the vast majority of civil aviation (including commercial aircraft) traffic that operates in and out of Fairbanks. Dozens of flights per day depart to the west, north and east of Fairbanks, crossing the proposed routes of these two MTRs, enroute to literally dozens of remote villages, whose only means of access to the outside world are these air taxi flights.

In addition to the many air taxi flights per day that travel these routes, significant and increasing flight seeing traffic travels to the north and northwest of Fairbanks on a daily basis. Again, all these flights run nearly perpendicular to the proposed MTR 960 and 970. Finally, a significant volume of recreational air traffic crosses these routes on a daily basis. This is simply some of the busiest civil airspace in Alaska.

To make matters worse, according to the information provided, both the proposed VR 960 and VR 970 have segments as high as 1500 feet above ground level. Since both of these routes travel in mountainous or hilly terrain, this will place military aircraft right in the flight path of much, if not most of the civil air traffic traveling those heavily used routes.

A primary reason for this proposal, according to the document is: "One identified need for the proposed action is to reduce military training in areas of high civilian airspace activity by moving MTRs to lower traffic areas". In fact, by creating VR 960 and VR 970, implementation of this proposal would place military aircraft right in the middle of the most heavily used civil airspace in northern Alaska. Not only would military aircraft be flying at high airspeeds in this very busy civil airspace, but they would be doing so nearly perpendicular to and at the same altitudes as the vast majority of the civil traffic. This would make see and avoid very difficult, if not impossible.

6) The Air Force argues that the proposed low levels of use on the proposed MTRs will present a low threat to civil aviation: "Additionally, the USAF proposes to reduce the number of potential flights on almost all MTRs. For new routes and segments, flight operations would average 1 sortie per week or less resulting in a low impact on civilian airspace use."

While low intensity of military use would lessen the potential for mid air collisions, it would also mean that the presence of the MTRs would essentially go unnoticed by most civil aviators, whereas routes that are regularly used would be more likely to be known by civil aviators. While a somewhat perverse logic, running high speed military operations through such busy airspace would absolutely demand that every civil aviator was aware of the military activity.

7) The document states "civilian pilots are responsible for checking with the FAA to determine whether the MTR is active and, if so, for using caution when crossing or traveling within an active MTR." Precisely how are civilian aviators supposed to accomplish this? Air Force personnel admit that military aviators entering onto an MTR may simply transmit their intentions in the blind, and on UHF frequencies at that. Civil aircraft are not equipped with UHF radios. There is no requirement that military aviators establish two-way radio communication with the FAA prior to operating on a Visual Route. Further, even if the servicing FAA facility for that sector does receive a communication from a military aircraft indicating that it is entering an MTR, the FAA keeps no record of this transmission, and there is no dissemination of this information to civil aviators.

In fact, the only consistently accurate information available to civil aviators reference activity on MTRs is found on the margins of the VFR charts, ie: They may be active from 7:00 AM to 10:00 PM weekdays. Frankly, that is less than helpful in avoiding conflicts in areas of high civilian activity. Even if the FAA did have some mechanism to receive, record and disseminate real time activity on an MTR, it would be virtually impossible to ensure that such information could be disseminated into the cockpit of every aircraft in the area on a real time basis. There is no requirement for civil aviators to communicate with the FAA at all, let alone on a periodic basis, or to access traffic information.

In summary, the proposal to establish two new MTRs (960 and 970) that run tangential to the vast majority of commercial and recreational civilian aviation traffic operating out of Fairbanks is simply unacceptable to us, and we believe, to the majority of civil aviators in the Fairbanks area. The military simply must find different routing for their proposed weather alternates that lie in some area with much less civil air traffic.

The remainder of the proposal appears to be acceptable, and some portions of it as noted above, are commendable.

Finally, while the Air Force has probably complied with the minimum requirements of the National Environmental Policy Act (NEPA) with this proposal, there was no significant effort to seek input from the civil aviation community. In fact, notification of the public review period was very low key, and availability of the document was kept to an absolute minimum. While the document was in fact available on the internet, a member of the public had to get a password to access that document, and this password had to be acquired from the 11th Air Force. This does not speak well for the Air Force's interest in seeking public input on the document. There is no reason that any member of

the public should ever have to request a password to view and comment on a public document.

To further confuse the situation, no information on where comments are to be sent is available that we could find in the document.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael T. Vivion". The signature is fluid and cursive, with a large loop at the end.

Michael T. Vivion
Chairman



ALASKA AIRMEN'S ASSOCIATION, INC.

12 August, 2005

Mr. James W. Hostman
611 CES/CEVP
10471 20th Street, Suite 302, Room 339
Elmendorf AFB, AK. 994506-2200

REF: Draft Environmental Assessment of Improvements to MTR in Alaska

Dear Mr. Hostman:

The Alaska Airmen's Association is a state-wide organization, with over 2,200 members, with a mission to enhance and preserve General Aviation. We have Regional Directors in Fairbanks, Bethel, Kenai and Juneau.

We serve on many Federal and State aviation advisory boards including the Governor's Aviation Advisory Board, ACMAC, NAAUG, Capstone, UAA Aviation Industry Advisory Board as well as transportation and airport boards.

We thank you for the opportunity to submit comments on the above Draft Environmental Assessment.

All pilots are aware of the treasure we have in Alaska with the airspace that offers opportunities to all to fly. As our road structure covers only 10% of the State, the only other practicable means of access is by air. Alaska has the greatest ration of pilot licenses to citizens of any state and general aviation is the largest part of the flying carried out in Alaska. Small GA aircraft are the backbone of access to many villages as well as to Federal, State and Native lands. The treasure of airspace has to be available to all and sharing that space should not enhance one group at the expense of another.

We have several concerns about the proposals.

Route 1905

This route goes through the busiest VFR route for general aviators going fishing. Those who have lived in Alaska for any extended period of time know that the hunting and fishing season is the most dangerous for small aircraft as they flock to the fishing spots during the appropriate season. Activation of route 1905 needs to avoid the fishing season altogether.

Routes 960 and 970

The two new routes 960 and 970 directly cross traditional and established general aviation corridors. While your draft expects that GA aircraft fly around MTR's, why is the reverse not the first choice? Have the Military aircraft fly around and avoid general aviation routes. Few GA aircraft can carry sufficient fuel to circumvent MTR's and have enough to fly the return flight.



We heard at ACMAC that the route would be covered by radar. Unless many new radars are installed that is untrue. Even some of the aircraft slated to fly these routes do not have airborne radar and would have to rely on "see and be seen." ATC radar cannot, at this time, "see" aircraft flying at low altitudes along the Yukon River area of these routes.

In view of the BRAC proposals to reduce Eielson AFB to warm status and have it activated by visiting training teams, there would be no knowledgeable local people there to ensure the continuity of concerns from the general public and GA about the traffic conflict on these routes.

The proposed mix of F-16, F15, F-22 and C-17 into a known area of small single-engine GA aircraft is great risk. The wake turbulence from a C-17 would remain for some time and distance behind such large aircraft and risks inverting and crashing smaller aircraft that might enter into the area.

We realize the importance of training to the military as many of our members are retired Air Force pilots. However, the better way to share this resource is to have adequate and timely notification of the use of the routes published to the general public through the Flight Service Stations and the Anchorage ARTCC. In the past, while dealing with MOA's and ATCA's, there has been a break in communications due to a lack of adequate communications between the ARTCC and FSS. It is time to remedy that so that both IFR and VRR aviators will have this information readily available to them. Previous concerns led to the introduction of the frequencies now used in the SAUIS.

The FSS have been diligently designing an internet system for pilot briefings and this would be a very appropriate place to publish the activation of the routes. The information would be readily available to pilots who use the internet, to those who talk with FSS, and those who would be in touch with ARTCC. The secret of safety here appears to be a good chain of communications between the military and the GA pilot. Such a chain does not exist today.

The Alaska Airmen's Association recommends that the Air Force work with the general aviation and small commercial operators in the state to mitigate problems with these routes. Recent statements at an Congressional Hearing by the FAA Administrator stated that at long last accidents in Alaska have been reduced significantly. For instance Alaska had double the national accident rate and the Bethel/Kusko area had 3 to 4 times the accident rate of anywhere else in the state. Accidents in that area have been reduced by 47% and it now has a lower rate than other areas of the state.

These are statistics that we have fought hard to achieve. We do not need to reverse them in Military Training Routes. The airspace should be available to all users without the risk of accidents.

Sincerely,

A handwritten signature in cursive script that reads "Felix M. Maguire" with a stylized flourish at the end.

Felix M. Maguire, Director



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August 8, 2005

Mr. James W. Hostman
611 CES/CEVP
10471 20th Street, Suite 302, Room 339
Elmendorf AFB, AK 99506-2200

RE: Draft Environmental Assessment of Improvements to Military Training Routes in Alaska

Dear Mr. Hostman:

The Aircraft Owners and Pilots Association (AOPA), on behalf of nearly 405,000 general aviation pilots, including over 4,500 pilots in Alaska, submits the following comments on the Draft Environmental Assessment (DEA) of Improvements to Military Training Routes (MTRs) in Alaska. AOPA supports the modifications to MTRs 937 and 940 since they will reduce future traffic conflicts between military and general aviation aircraft south of Delta Junction, AK. However, AOPA is concerned the DEA inadequately addresses the impacts to general aviation that the two new MTRs, 960 and 970, will have on vital Visual Flight Rules (VFR) routes operating northwest of Fairbanks, AK.

Usage Clarification is Necessary

AOPA recognizes the United States Air Force (USAF) proposed modifications to the MTRs in Alaska include a significant reduction in the number of annual flights allowable on all of the existing MTRs. According to the DEA Proposed Alternative, nearly 78% percent less potential sorties are forecasted per year than what the existing MTRs allow. AOPA recommends the Final EA clarify and explain in further detail such a significant decrease in potential operations on Alaska MTRs.

To allow airspace users to accurately assess and comment on the impacts of the allowable number of operations along the routes, Appendix F should be modified to include yearly total operations per route, as well as combined total operations per year for all the MTRs in Alaska.

Route Specific Comments

Routes 937 & 940

AOPA supports the relocation of MTRs 937 and 940, which currently traverse Isabell Pass. The relocation of these routes should reduce the potential for conflict between military and civil air traffic that currently exists on these highly used VFR corridor through the Alaska Range.

Routes 960 & 970

AOPA is concerned the USAF inadequately evaluated the potential impacts the two new MTRs, 960 and 970, would have on general aviation operations. These proposed routes cross the following general aviation corridors:

- Fairbanks west to Tanana, Galena and the villages of the lower Yukon and Koyukuk Rivers
- Fairbanks northwest to Bettles, the Brooks Range and Point Barrow.
- Fairbanks northeast to Fort Yukon, the middle Yukon and Chandalar River villages

Each of these corridors is heavily used due to the lack of road access to these regions of Alaska. The public relies on general aviation to provide basic transportation, groceries, supplies, mail and any other material goods. AOPA recognizes the USAF is proposing an average of one flight per week along the new MTRs, a relatively low frequency of use. However, the USAF should acknowledge the critical nature of these VFR routes and the high level of sensitivity to the safety of flight concerns of Alaska pilots and the public at large.

AOPA contends that the USAF needs to fully analyze the flight safety risks associated with mixing F-16's, F-15's and C-17's with small general aviation. Regardless of the number of military operations, a mix of slower, light general aviation aircraft with faster, heavier military aircraft maneuvering along an MTR represents a safety of flight risk and the USAF must realistically evaluate and present the impacts to general aviation pilots. AOPA recommends that the Final EA address in detail the safety of flight concerns of Alaskan airmen.

Mr. Hostman
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Possible mitigation efforts that should be explored in the Final EA are to: (a) provide timely notices of scheduled and actual military activity schedules for the various MTRs to the Federal Aviation Administration (FAA) Flight Service Stations (FSS), Anchorage Center, and directly to pilots via the internet. (b) work with the FAA to provide a common traffic advisory frequency and require military aircraft to monitor and communicate with general aviation pilots when using these routes. (c) extend the coverage of the Special Use Airspace Information Service currently operated by Eielson Range Control.

Route 1905

Segment A to B of route 1905 passes over the Talachulitna River, northwest of Anchorage. General aviation aircraft that overfly and land on gravel bars heavily use this area during fishing season. In light of this seasonal spike in usage, AOPA recommends this route should begin at point B or limited to use before and after fishing season.

Other route specific information:

The routes east and southeast of Fairbanks are also heavily used and AOPA recommends Special Use Airspace Information Service (SUAIS) be capable of providing a means for information distribution to general aviation pilots about MTR use in these areas.

Affected Airspace Environment

Section 3.2.3, Airspace and Aviation Safety, of the DEA describes the proposed MTRs effects on civil airspace and aviation and states:

“The changes to air traffic and the MTR structure would most likely be noticeable to small aircraft pilots. General aviation pilots are responsible for checking with the FAA to determine whether the MTR is active and for using caution when crossing or traveling within an active MTR. Civilian aircraft generally fly around MTRs to avoid encounters with high-speed, low-altitude military aircraft. If a military aircraft on a VR encounters a civilian aircraft, see and avoid rules apply. If Instrument Meteorological Conditions (IMC) are applicable, the aircraft is on IR, and IFR separation rules apply.”

The report assumes general aviation pilots are able to obtain activation schedules and times from the FAA. Several deficiencies exist in Special Use Airspace activation information distribution to general aviation pilots. In reality it is quite difficult for non-participating pilots to determine if MTRs are active. It is often the case that the local FSS has no more MTR activation information available to them than what pilots are able to read from their sectionals or AP/1B and therefore it is nearly impossible for general aviation pilots to know if or when MTRs are being used.

Mr. Hostman
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Furthermore, general aviation pilots are **not** inclined to fly around MTRs. The two new MTRs alone are between 145 and 210 nautical miles long. A typical flight from Fairbanks to Stevens Village would be about 80 nautical miles, however a diversion to fly around and avoid the proposed 970 MTR would entail a 210 nautical mile diversion over rugged terrain to the west. The impact of such diversions **is significant** to general aviation operators; more than doubling the amount of time and direct operating costs. AOPA contends that general aviation pilots should not be expected to fly around joint-use airspace when it is not being used or have to guess when a MTR is being used.

AOPA highly recommends the USAF work closely with Alaska's general aviation community to assess and mitigate the impacts the proposed routes may have on general aviation airspace operations and detail those findings in the Final EA.

AOPA appreciates the opportunity to provide these comments and looks forward to working with the Air Force to ensure all potential flight safety impacts are addressed.

Sincerely,



Ryan Kahl
Government Analyst
Air Traffic, Regulatory, and Certification Policy

K.3 Air Force Responses

K.3.1 Communication

COMM-01: Provide timely notices of schedules and actual military activity schedules for the various Military Training Routes (MTRs) to the Federal Aviation Administration (FAA) Flight Service Stations (FSS), Anchorage Air Route Traffic Control Center, (ARTCC) and directly to pilots via the internet. Require military aircraft to monitor and communicate with general aviation pilots when using these routes.

A better way to share airspace is to have adequate and timely notification of the use of these routes published to the general public through the FSS and the Anchorage ARTCC.

AF Response/Action: *When the use of any MTR is scheduled, the schedule is relayed to the FAA via the ARTCC. The FAA is also notified when a flight plan is filed. This notification is consistent with FAA requirements throughout the United States. An additional feature Alaska has is the Special Use Airspace Information Service (SUAIS). SUAIS allows all pilots, residents, and visitors to either call in during preflight planning or while airborne to determine status of military flights around the Eielson/Fairbanks region. The USAF does not normally post the flying schedule on the internet due to security concerns. Additionally, the USAF requires all fixed-wing aircraft to fly Instrument Flight Rules (IFR) to the maximum extent possible (Air Force Instruction (AFI) 11-202 vol. 3). If military aircraft are on an IFR flight plan, they are required to receive permission to enter the MTR from the controlling Air Traffic Control (ATC) facility and to maintain radio contact when able. All aircrews are responsible for see and avoid tactics while flying any route.*

COMM-02: While briefings were presented to the Alaska Civil/Military Aviation Council (ACMAC) group, no formal feedback was sought from that group or from the aviation community in general. While there is no legal requirement for the military to consult with civil aviators and seek their input, a better product would be achieved if such a consultation were conducted.

The Aircraft Owners and Pilots Association (AOPA) highly recommends the USAF work closely with Alaska's general aviation community to assess and mitigate the impacts the proposed route may have on general aviation airspace.

AF Response/Action: *Feedback, formal or not, is always welcome from the ACMAC meetings. The ACMAC is a forum to announce intentions prior to presenting the information formally. It has been used as a pre-scoping forum to address issues early in the process. Feedback can be addressed to 11th Air Force Airspace and Range Operations Flight at anytime in the process.*

The USAF has numerous programs that address military training within Alaska. These robust programs ensure that communication between civilian aviation and the military is enhanced.

K.3 Air Force Responses

K.3.1 Communication

COMM-01: Provide timely notices of schedules and actual military activity schedules for the various Military Training Routes (MTRs) to the Federal Aviation Administration (FAA) Flight Service Stations (FSS), Anchorage Air Route Traffic Control Center, (ARTCC) and directly to pilots via the internet. Require military aircraft to monitor and communicate with general aviation pilots when using these routes.

A better way to share airspace is to have adequate and timely notification of the use of these routes published to the general public through the FSS and the Anchorage ARTCC.

AF Response/Action: *When the use of any MTR is scheduled, the schedule is relayed to the FAA via the ARTCC. The FAA is also notified when a flight plan is filed. This notification is consistent with FAA requirements throughout the United States. An additional feature Alaska has is the Special Use Airspace Information Service (SUAIS). SUAIS allows all pilots, residents, and visitors to either call in during preflight planning or while airborne to determine status of military flights around the Eielson/Fairbanks region. The USAF does not normally post the flying schedule on the internet due to security concerns. Additionally, the USAF requires all fixed-wing aircraft to fly Instrument Flight Rules (IFR) to the maximum extent possible (Air Force Instruction (AFI) 11-202 vol. 3). If military aircraft are on an IFR flight plan, they are required to receive permission to enter the MTR from the controlling Air Traffic Control (ATC) facility and to maintain radio contact when able. All aircrews are responsible for see and avoid tactics while flying any route.*

COMM-02: While briefings were presented to the Alaska Civil/Military Aviation Council (ACMAC) group, no formal feedback was sought from that group or from the aviation community in general. While there is no legal requirement for the military to consult with civil aviators and seek their input, a better product would be achieved if such a consultation were conducted.

The Aircraft Owners and Pilots Association (AOPA) highly recommends the USAF work closely with Alaska's general aviation community to assess and mitigate the impacts the proposed route may have on general aviation airspace.

AF Response/Action: *Feedback, formal or not, is always welcome from the ACMAC meetings. The ACMAC is a forum to announce intentions prior to presenting the information formally. It has been used as a pre-scoping forum to address issues early in the process. Feedback can be addressed to 11th Air Force Airspace and Range Operations Flight at anytime in the process.*

The USAF has numerous programs that address military training within Alaska. These robust programs ensure that communication between civilian aviation and the military is enhanced.

The programs are designed to distribute information in a timely manner, to enhance safety between military and civilian aircraft, and ensure proper public notice. One of these programs is SUAIS. SUAIS allows all pilots, residents, and visitors to either call in during preflight planning or while airborne to determine status of military flights around the Eielson/Fairbanks region. This service has the capability to inform flyers with radar traffic advisories. Another service the military participates in is attending aviation seminars, answering questions, and presenting its programs to those attending. The USAF is always open to addressing the concerns of the civilian aviation community and desires to continue working with these organizations to enhance compatibility.

COMM-03: Possible mitigation efforts that should be explored in the Final EA are:

- Provide timely notices of scheduled and actual military activity for the various MTRs to the FAA, FSS, the Anchorage ARTCC, and directly to pilots via the internet.
- Work with the FAA to provide a common traffic advisory frequency and require military aircraft to monitor and communicate with general aviation pilots when using these routes.
- Extend the coverage of the SUAIS currently operated by Eielson Range Control.

AF Response/Action: *Currently, the military notifies the FAA via the ARTCC on planned missions. However, missions may change for multiple reasons and the USAF works closely with the FAA during these changes. SUAIS is also available to aid civilian pilots in effectively utilizing the airspace and to gain better knowledge of when and where military flight operations will occur.*

COMM-04: There is no requirement for military aviators to establish two-way radio communication with the FAA prior to operating on a Visual Route. Further, even if the servicing FAA facility does receive a communication from a military aircraft indicating that it is entering an MTR, the FAA keeps no record of this transmission, and there is no dissemination of this information to civil aviators.

USAF personnel admit that military aviators entering an MTR may simply transmit their intentions in the blind, and on UHF frequencies at that. Civil aircraft are not equipped with UHF radios.

AF Response/Action: *The USAF requires all aircrew to fly IFR to the maximum extent possible. This includes flying to or from Visual Routes (VR) and Instrument Routes (IR). Additionally, most USAF aircraft have either radar or Traffic Alert/Collision Avoidance System (TCAS) installed and to aid in maintaining separation between aircraft. The USAF is enhancing*

safety in all realms of training by filing a flight plan, talking to ATC facilities, and communicating appropriately. When use of any MTR is scheduled, the schedule is relayed to the FAA via the FSS and ARTCC. If military aircraft are on an IFR flight plan, they are required to receive permission to enter the MTR from the controlling ATC facility and maintain radio contact to the maximum extent possible. All aircrew, civilian and military, are responsible for see and avoid tactics while on any route. Military aircraft are primarily equipped with UHF radios, however the radios are being upgraded to allow for VHF transmissions as time and resources permit. The aircrew transmits in the blind to inform ATC, FSS, or other aircraft UHF equipped of their intentions.

K.3.2 Content

CONT-01: Appendix F should be modified to include yearly total operations per route as well as combined total operations per year for all the MTRs in Alaska.

AF Response/ Action: *See Appendix F for additional information on MTR operations.*

CONT-02: To help evaluate the impact of the proposed action, the USAF should include actual usage over the past five years on an individual route basis.

AF Response/Action: *Due to numerous deployments and the high operations tempo, MTR numbers over the last five years are a poor representation of future operations. Therefore, including these numbers would not add merit. The proposed action estimates maximum future operations.*

CONT-03: According to the Draft EA, nearly 78 percent fewer potential sorties are forecasted per year than what the existing MTRs allow. AOPA recommends the Final EA clarify and explain in further detail such a significant decrease in potential operation on Alaska MTRs.

AF Response/Action: Numbers have been adjusted in the EA. The decrease in numbers was due to an oversight of adding MTR estimates.

K.3.3 Mitigation

MIT-01: MTR 1905 should begin at Point B or be limited to use before and after fishing season.

Activation of MTR 1905 needs to avoid the fishing season altogether.

AF Response/Action: *During the fishing season, Segment A-B will be deactivated, and the entry point for MTR 1905 will be Point B. Refer to Table A-5 in Appendix A of the EA.*

K.3.4 Operations

OPS-01: The Draft EA should not suggest that use levels will decrease under the proposed action unless that is true. From the figures given and the statements in other parts of the document, it appears that the military is simply correcting its previous estimates.

It appears the USAF is actually estimating its actual use of the MTRs. With the addition of a C-17 contingent based at Elmendorf AFB, the number of sorties flown per week would increase.

AF Response/Action: *The proposed estimates are a result of a change in aircraft sortie assignments. They are based on proposed changes in the aircraft anticipated to use the routes in the near future, all known force structure changes, and mission changes at the time this EA was drafted. The C-17 mission will increase the use of the routes. The USAF has based its use on the maximum possible use during normal training operations.*

OPS-02: In view of the Base Realignment and Closure Commission (BRAC) proposals to reduce Eielson Air Force base (AFB) to warm status and have it activated by visiting training teams, there would be no knowledgeable local people there to ensure the continuity of concerns from the general public and general aviation about the traffic conflict on these routes.

AF Response/Action: *Eielson AFB will not be placed into a warm status. The 611th Air Operations Squadron (AOS) Airspace and Range Operations Flight, along with the 353rd Cope Thunder Squadron (CTS), will continue to provide continuity and will be the direct liaison to the visiting training units.*

OPS-03: The Alaska Air Carriers Association (AACCA) requests the USAF withdraw its intention of MTRs 960 and 970, until at least two public hearings are conducted, or limit usage of MTRs 960 and 970 to certain times/days of the week.

AF Response/Action: *Due to training requirements and lost training opportunities on current MTRs, the USAF is continuing with its plan for the two new routes. The public comment period produced one individual comment. The USAF has moved MTR 960 further north to mitigate concerns with traffic close to Fairbanks airport. When use of any MTR is scheduled, the schedule is relayed to the FAA via the FSS and ARTCC. The USAF requires all aircrews to fly IFR to the maximum extent possible. If military aircraft are on an IFR flight plan, they are required to receive permission prior to entering the MTR from the controlling ATC facility and maintain radio contact to the maximum extent possible.*

K.3.5 Safety

SAF-01: MTRs 960 and 970 will have a significant impact on safety for Fairbanks-based air carriers. The routes cut directly across currently used commercial airspace. Not only would military aircraft be flying at high speeds in this very busy civil airspace, but they would be doing so nearly perpendicular to, and at the same altitudes as the vast majority of the civil air traffic, which would make see-and-avoid tactics very difficult.

AF Response/Action: *MTR 960 has been adjusted by relocating it to the north, which helps mitigate the safety concerns of the civilian aviation community. The coordinates and figures for the new proposed MTR 960 are provided in Section 4-7 as well as Appendices A and B. No changes are proposed for MTR 970. The USAF will also publish information to hazardous flight areas in the FLIP AP/1B (USDoD 2006).*

SAF-02: General aviation pilots are not inclined to fly around MTRs. The impact of diverting around MTRs would be significant to general aviation operators, doubling the amount of flying time and direct operating costs.

While the USAF expects that general aviation aircraft will fly around MTRs, why is the reverse not the first choice? Have the military aircraft fly around and avoid general aviation routes. Few new general aviation aircraft can carry sufficient fuel to circumvent MTRs and have enough to fly the return route.

AF Response/Action: *The military understands civilian aircraft do not normally fly around MTRs to avoid encounters with high-speed, low-altitude military aircraft. Civilian pilots should enhance safety by either flying over or around MTRs; however the USAF recognizes that, in many cases, this is unrealistic. All pilots should check with the FAA to determine whether the MTR is active and to exercise caution when crossing or traveling within an active MTR.*

SAF-03: Both proposed MTRs 960 and 970 have segments as high as 1,500 feet above ground level (AGL). Since both of these routes are located in mountainous or hilly terrain, this will place military aircraft right in the flight path of much, if not most, of the civil air traffic traveling these two heavily-used corridors.

AF Response/Action: *MTR 960 has been adjusted to the north addressing the safety concerns of the civilian aviation community. The coordinates and figures for the new proposed MTR 960 are provided in Section 4-7 as well as Appendices A and B. No changes are proposed for MTR 970. The USAF will continue to stress collision avoidance techniques to its aviators.*

SAF-04: We have heard at Alaska Civil/Military Aviation Council (ACMAC) that the routes would be covered by radar. Unless new radar is installed, that is untrue. Even some of the aircraft slated to fly the routes do not have airborne radar and would have to rely on “see and be seen” tactics. ARTCC radar cannot, at this time, “see” aircraft flying at low altitudes along the Yukon River area of these routes.

AF Response/Action: *Not all routes are covered by radar. All aircraft are required to use see and avoid tactics while operating in Visual Meteorological Conditions (VMC) conditions.*

SAF-05: The proposed mix of F-16, F-15, F-22, and C-17s into a known area of small single-engine, general aviation aircraft poses a great risk. The wake turbulence from a C-17 would remain for some time and distance behind such a large aircraft and risks inverting and crashing smaller aircraft that might enter into the area.

AOPA recommends that the Final EA address in detail the safety of flight concerns of Alaska airmen.

The USAF should acknowledge the critical nature of these VFR routes and the high level of sensitivity to the safety of flight concerns of Alaska pilots and the public at large.

AF Response/Action: *The USAF fully recognizes the role and concerns of Alaska civilian aviators and makes every attempt to enhance airspace safety. Wake turbulence is a risk to aviation everywhere. To date, there have been no known major incidents with civilian aviation and C-17 aircraft due to wake turbulence, and C-17s have been flying for over 10 years. By proper training and education, this risk can be mitigated. The USAF continually trains aircrews regarding these hazards.*