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September 17, 2009

Major Stephen R. Lippert
Project Manager
NBG/A 7AM
3500 Fetchet Avenue
Andrews AFB, MD 20762-5157

Dear Major Lippert:

RE: Proposal 07-ANE-003-NR Sugarloaf Mountain, ME

The Aircraft Owners and Pilots Association (AOPA), representing more than 413,000 general aviation (GA) pilots, including over 18,800 in the New England region, opposes the proposed changes to the Condor Military Operations Area (MOA) near Sugarloaf Mountain, Maine. The changes would cause degradation in safety for general aviation and military pilots who would be operating in the expanded airspace. Because of the potential for this proposal to have significant environmental and safety impacts, AOPA also contends that a full Environment Impact Study (EIS) and analysis would be required before the Massachusetts Air National Guard (MANG) could move forward with the proposed changes.

Safety Compromised by Lower Condor MOA Floor

AOPA is concerned about the safety implications of the 500 feet above ground level (agl) floor of the Condor Low MOA. Placing high speed, low altitude military aircraft into airspace that is regularly occupied by slower moving, less equipped general aviation aircraft increases the potential for mid-air collisions. This low altitude airspace is used extensively for flight training, transitioning, sightseeing and seaplane operations.

According to Boston Air Route Traffic Control Center (ARTCC), radar coverage and communications within the footprint of the proposed MOA is intermittent to non-existent below 7000 feet. It is highly unlikely that Boston ARTCC will have the ability to offer separation between participating military aircraft and non-participating general aviation aircraft operating in the MOA. Onboard radar used by the military aircraft that could potentially mitigate some risks would essentially be rendered useless due to the terrain and high speeds of these exercises. In addition, onboard radar does not provide any type of radar separation services for civil aircraft operating in the MOA.

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Proposed SUA Impractical Because of Protected No Fly Zones

The Environmental Assessment (EA) indicates there are numerous Known Bald Eagle Essential Habitats within the proposed SUA that are protected by no fly zones. These no fly zones are scattered throughout the proposed airspace and limit military aircraft with a one-half mile standoff distance and 1,000 feet agl altitude limitation. The military has also offered to create a no fly zone around local residence property to mitigate local noise concerns with similar standoff distances. These limits on low altitude training operations reduce the utility and viability of the airspace for the militaries training needs.

Adirondack Special Use Airspace (SUA) could be used in lieu of establishing a new MOA. MANG states that other SUA in the area would not suffice due to limited size. However, MANG does not address the fact that an SUA complex near Ft. Drum, New York is currently being modified and could likely be expanded to meet the MANG training requirement. This airspace complex, referred to as the Adirondack Airspace Complex, would be closer to Barnes Airport in Westfield, Massachusetts and Burlington International Airport in Burlington, Vermont than to the Condor MOA complex. Because the unit currently stationed at Barnes Airport uses the existing Adirondack Airspace complex for low-level training, there would be no increase of military activity in that area. AOPA contends that expanding both Condor and Adirondack SUA areas would result in redundant SUA and would not be an efficient use of the National Airspace System (NAS).

Summary

AOPA understands the National Guards need to properly train. AOPA also understands that utilizing airspace within the NAS without fully addressing the concerns of civilian use in busy airspace is a decision that affects many current users of the NAS. This is why AOPA opposes the proposed changes to the Condor Military Operations Area

Sincerely,



Robert Hackman
Senior Director
Regulatory Affairs