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September 16, 2015

Mr. Paul Gallant
U.S. Department of Transportation
Docket Operations, M–30
1200 New Jersey Avenue SE.
West Building Ground Floor, Room W12–140,
Washington, DC 20590–0001

Re: FAA Docket No. FAA–2015–2776 and Airspace Docket No. 15–AEA–5, Notice of Proposed Rulemaking for Proposed Amendment and Establishment of Restricted Areas; Chincoteague Inlet, VA

Dear Mr. Gallant,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submit the following comments in response to the Notice of Proposed Rulemaking for the amendment and establishment of additional Restricted Areas at Wallops Flight Facility, VA. AOPA is concerned with the impacts this large expansion of Restricted Area could have on local and transient Visual Flight Rule (VFR) and Instrument Flight Rule (IFR) aircraft.

IFR Aircraft

In the June 9, 2004, final rule regarding R-6604, the FAA noted that the VOR Federal Airway 139 (V-139), which connects Snow Hill VORTAC (SWL) and Cape Charles VORTAC (CCV), had high traffic demand. The rule noted that the activation of R-6604 increased the workload for air traffic controllers and pilots due to the need to reroute aircraft so as to avoid this airspace. The Restricted Area was consequently reduced in size so as to not interfere with V-139.

The 2015 proposed R-6604 D and E areas would revert the design back to a shape that the FAA noted significantly impacted this highly travelled airway. The Restricted Area would be expanded in a way that it intersects V-139 close to SWL which would render this segment unusable during periods of activation. Pilots are currently permitted to fly this route as low as 2,000' MSL but this would not be possible if the Restricted Area extends from 100' or 700' AGL to 3,500' MSL.

Additionally, the feeder route from SWL to the initial approach fix of GOBYO for Ocean City Municipal Airport's (KOXB) RNAV (GPS) RWY 32 instrument approach procedure would be unavailable during activation of R-6604D. Pilots and controllers would lose the efficiency provided in the feeder route design and there would be an increased likelihood of pilots needing to fly longer routes. Increasing the distance pilots need to fly increases fuel consumption and the economic impact on the operator.

VFR Aircraft

The more than doubling of the Restricted Area in this location will lead to increased circumnavigation and greater expense for pilots. Highway US-13, the railroad tracks, and a much larger extent of the seashore would no longer be available for VFR navigation during periods of activation. These three types of landmarks are routinely used by pilots who navigate without the use of GPS or navigational aids, and who notably fly at lower altitudes. Flying the shoreline at lower altitude is a particularly popular method of navigation. The large expanse of Restricted Area would make circumnavigation to the east over open water dangerous for those single-engine shore line following pilots, and time consuming for those diverting around the complex to the west.

Recommendations

AOPA contends the proposed airspace design would have a negative impact on many aircraft and offers the following recommendations to mitigate the effect.

- Consideration must be given to other types of Special Use Airspace (SUA) before additional Restricted Area is enacted. The doubling of the Restricted Area in this area requires justification as it will negatively impact many general aviation pilots.

- Reduce the size of R6604 D and E to not interfere with V-139. Furthermore, reducing the ceiling of the airspace to be below the usable segment altitude for V-139, if feasible, would allow pilots to overfly the Restricted Area. These two mitigations would allow the continued operation of IFR aircraft on this well-travelled route and reduce pilot and air traffic controller workload.

- Any new Restricted Area must be charted on applicable instrument approach procedures. The proposed Restricted Area comes very close to numerous final approach courses of surrounding airports so increasing pilots situational awareness is important.

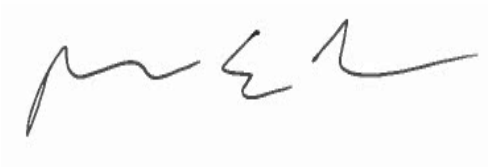
- Providing VFR stand-alone waypoints in the Chincoteague area will assist pilots unfamiliar with the area safely navigate around any expanded Restrict Area.

- The proposal states activation for R-6604 D and E areas would take place by NOTAM but fails to state how much advance notice pilots would receive. Pilots cannot adequately flight plan should this airspace be activated after they depart. Aircraft can have over six hours of fuel endurance and having to deal with a long reroute can lead to issues of the pilot having enough fuel and unnecessary fuel diversions. At least 12 hours advance notice is necessary to assist pilots.

The AOPA understands and supports the National Aeronautics and Space Administration's and the Department of Defense's need to flight test aircraft that support the national defense. We believe this testing can be done in a manner that will not cause an undue negative effect on general aviation.

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

Sincerely,



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.