

July 02, 2019

Clear Air Force Station LRDR SUA EIS
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2525 C Street Suite 500
Anchorage, AK 99503



RE: MISSILE DEFENCE AGENCY NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT FOR THE LONG RANGE DISCRIMINATION RADAR AT CLEAR AIR FORCE STATION, ALASKA

The Alaska Airmen Association is a not-for-profit General Aviation (GA) organization that represents over 2000 members. Our mission is to “Promote General Aviation in Alaska.” Membership includes pilots, mechanics, aircraft owners, and other aviation enthusiasts. On behalf of our membership, thank you for the opportunity to submit the following written comments concerning the Long Range Discrimination Radar at Clear Air Force Station, Alaska.

Alaska and its vast expanses of rugged lands and majestic waters is a national treasure and has great strategic importance for the defense and protection of the nation. The Alaska Airmen Association understands the importance of the Long Range Discrimination Radar (LRDR) and the value of locating it at the Clear Air Force Station (CAFS). However;

The Alaska Airmen Association strongly opposes the expansion of R-2206 as currently presented.

Aviation is a fundamental method and means of transportation in Alaska. According to the Federal Highway Administration, New Hampshire has approximately the same road miles as Alaska. However, Alaska is 64 times the size of New Hampshire. Windy Pass is one of two key access routes between the Interior and South Central Alaska, the largest population centers of the State.

Isabel Pass to the East is already clogged with Special Use Airspace (SUA) and will be truncated this Fall with another Restricted Area and talks of yet more SUA over the missile complex at Ft. Greely in the future. The current and upcoming restrictions have made Isabel pass a nonviable route to/from the Interior in the best of weather conditions and all but impassable in low weather conditions.

The Isabel Pass restrictions are not within MDA's scope or purview for this Environmental Impact Statement. However, it is important to note that the condition of the airspace in Isabel Pass in conjunction with the proposed expansion of R-2206 does point to the continued and systematic erosion of the public's access to airspace and our ability to safely conduct commerce and personal travel.

The proposed expansion of R-2206 will severely limit options for aviators flying into or out of Windy Pass. The increased size of R-2206 will result in the loss of visual references like the Parks Highway and the Nenana River during marginal weather. These landmarks are essential for judging whether or not an aircraft is outside the SUA. The proposed floor of 1000' over the Parks Highway is not sufficient to maintain a safe altitude and places pilots at risk of violating the FAA requirements for minimum safe altitudes as stated in 14 CFR 91.119. The 400' inner portion of the proposal will most certainly prohibit any aircraft from flying at a safe altitude. The Alaska

Airmen Association requests that a notch be cut into the airspace over and along the Parks Highway that would allow air traffic to fly within 2NM of the Parks Highway up to 3,000 AGL.

Small reroutes to avoid airspace causes a substantial cumulative increase in the cost of operations. A simple 5-minute increase in flight time results in a \$10-\$19 increase in direct operating expenses for our average member (*Conklin & deDecker, Aircraft Cost Evaluator*). Commercial operators and airlines will have much higher increases in their operating cost when flying in the vicinity of the expanded R-2206. With the FAA documented traffic flying through this area, these increased flight times will cost the aviation industry millions of dollars annually.

Access to frontier landing strips in the area is essential for residents. There are several such strips in the Kobe Subdivision to the South West of CAFS. These strips are under the proposed expansion of R-2206 and yet are essential for providing safe access to/from homes when the pioneer roads and winter trails are not passible. The airspace floor would make it difficult and unsafe to operate from those strips. Accommodations need to be made so that residents can safely access their homes.

The Clear Airport (PACL) is essential to the region as a weather alternate, safety for those traversing Windy Pass, an important airport in the training of new pilots for cross-country flights, and the key to the glider operations of the Civil Air Patrol. PACL is also a critical medivac location for the region. The usefulness of PACL is in jeopardy with this expansion. The proximity of the SUA makes it unlikely that PACL will ever be eligible for an instrument approach, which is vital for consistent and reliable medivac access. The traffic pattern is already altered to accommodate the existing SUA, and any further encroachment would make it operationally unsafe. If safe, reasonable, and consistent access to PACL is not viable due to the need to expand the R-2206, the MDA should fund the construction of a new airport in the region to allow these critical activities to continue.

The Alaska Airmen Association is also concerned about the timeline for the activation and testing of the LRDR. We understand the urgency in getting the radar operational, but we also understand the long and tedious process the FAA is required to follow to amend and restructure the airspace that will be required to accommodate an expansion of R-2206. These two factors are in direct conflict. It is the position of the Alaska Airmen Association that the use of a Temporary Flight Restriction (TFR) is not a workable short-term solution.

Once again, the Alaska Airmen Association understands the need and fully supports the mission of the MDA and the Military in defending the United States and our Allies. Thank you for allowing the Alaska Airmen to comment on this proposal. We look forward to continuing our work with the Missile Defense Agency to responsibly balance the need to protect and defend our Homeland but also to allow Alaskans to safely and efficiently travel throughout the State.

Sincerely,



Adam White
Director of Government Affairs