

April 10, 2017

U.S. Department of Transportation
Docket Operations
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

**Re: FAA Docket Number FAA-2016-9495 and Airspace Docket Number 15-AAL-6
Proposed Establishment of Restricted Areas R-2201 A, B, C, D, E, F, G, H, and J; Fort
Greely, AK**

The National Business Aviation Association (NBAA) represents the interests of more than 11,000 member companies who own or operate aircraft to support their business. NBAA submits the following comments in response to the proposed establishment of Restricted Areas R-2201 A, B, C, D, E, F, G, H and J near Fort Greely, AK. NBAA supports the United States Army and understands the need for training areas to reflect modern battlefield requirements. However, the Restricted Area complex as proposed will have an adverse impact on the safety and efficiency of air travel in and around Alaska.

The United States Army Alaska's (USARAK) proposed Restricted Areas will overlie the existing Battle Area Complex (BAX) and Combined Arms Collective Training Facility (CACTF) and represent the goal of shifting from a Controlled Firing Area (CFA) to the ability to conduct live-fire from rotary and fixed wing aircraft. With nearly 400 square miles of Special Activity Airspace (SAA) near the proposed complex, we strongly urge the USARAK to explore the use of existing SAA as the impacts to air travel and commerce between northern Alaska and south-central communities will be greatly impacted with creation of R-2201.

Location adversely impacts visual and instrument flight operations

The proposed Restricted Area complex would be located immediately south and east of Allen Army Airfield near the Donnelly Dome, along a critical route to and from the Isabel Pass connecting interior and southcentral Alaska. Isabel pass offers a safe passage for Visual Flight Rules (VFR) operators to transit while safely avoiding terrain and utilizing visual landmarks to navigate along the Richardson Highway and Trans Alaska Pipeline. The proposed R-2201 complex would further constrain operations in this corridor beyond the existing limitations of the R-2202 complex and impact the safety of operations utilizing this heavily utilized VFR route.

As proposed, the R-2201 complex would also impact two critical navigation aids (NAVAIDs) and the routes they support connecting Fairbanks and northern Alaska with south-central portions of the state. The BIG and DJN NAVAIDs support over a half dozen Instrument Flight Rules (IFR) routes connecting northern Alaska with south-central communities including: A2-15, B-25, V-515, V-444, V-481, T-226 and T-232. When the R-2201 complex is active, all routes to and from BIG and DJN will be unusable and IFR traffic will be forced to circumnavigate around all the SAA adding flight miles, additional cost and inefficiencies.

Connectivity to many small communities throughout Alaska depends on air travel over a large geographic area. The operating environment within the state consists of extreme weather conditions and large areas of non-radar airspace below FL180 where the majority of air travel in Alaska occurs. For these reasons, a robust route structure is needed to accommodate IFR travel. The reduction of numerous IFR routes connecting northern and south-central Alaska resulting from the proposed R-2201 creates impacts to air travel that are unacceptable. Greater reliance on VFR routes and circumnavigating large SAA footprints will adversely impact safety and could lead to a higher accident rate as the benefits of the IFR support structure will not be available. The National Transportation Safety Board's (NTSB) safety study of Alaska (see NTSB SS-95-03) points out "an improved low altitude [IFR] system... would reduce the incidence of fatal accidents involving VFR flight into [IMC] in the State and result in a net safety improvement for Alaska aviation."

Frequent utilization significantly impacts General Aviation

As proposed, the times of use for each proposed Restricted Area are 12 hours each weekday and other times by Notice to Airmen (NOTAM). Since the airspace can be active for up to 242 days annually, this complex would be one of the most frequently activated restricted airspace areas in the National Airspace System (NAS) and further compounds the impacts on the general aviation community.

Conclusion

The USARAK's proposed R-2201 complex serves to add a significant barrier to air travel in the interior of Alaska where SAA already encompasses over 400 square miles of airspace. Based on the safety and operational impacts to IFR and VFR operations and the extensive activation times proposed, we urge the Federal Aviation Administration to require the Army to reconsider the use of existing SAA adjacent to the proposed complex and to work with Alaska NAS users on a compatible solution that does not add complexity and safety impacts in an area already constrained. We appreciate the opportunity to provide comments on this important issue.

Sincerely,



Heidi J. Williams
Director, Air Traffic Services & Infrastructure