

June 02, 2020

Missile Defense Agency
Attn: Mr Chris Smith MDA/MSR Environmental
Building 5222 Martin Road
Redstone Arsenal, AL 35898
lrdr.info@mda.mil



RE: LONG RANGE DISCRIMINATION RADAR (LRDR) PERFORMANCE TESTING, CLEAR AIR FORCE STATION (CAFS), ALASKA. PROPOSED FINAL ENVIRONMENTAL ASSESSMENT (EA) COMMENTS

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 LRDR Performance Testing Environmental Assessment.

Based on conversations with the Missile Defense Agency and the FAA, the Performance Testing period will be delayed as a result of the COVID-19 Pandemic. The Alaska Airmen Association feels that this will benefit the aviation community. By the time testing commences, the bulk of the busy flying season will be concluded. Summers are short but very intense in Alaska. Flying decreases in the winter months, which will allow a more robust education period for the public to get accustomed to the Temporary Flight Restriction (TFR) before the next flying season.

The Alaska Airmen Association requests that the daily testing periods be adjusted to maximize the available daylight hours for use by the public. Most of our membership operates in VFR conditions and during daylight hours. Keeping those hours free of the TFR would greatly help our ability to travel without fear of an airspace incursion. The winter daylight hours seem to already coincide with the scheduled times. As we get into next summer, it would be helpful if the testing would not start until 8 PM locally. It would be beneficial to have the early evening hours for our membership to finish their flying day, even if it means running the testing period later into the morning hours.

The Alaska Airmen Association disagrees with the assertion of the EA that flight reroutes and detours would be "negligible to minor." By the FAA's admission in the Safety, Risk Management Panel (SRMP) for the LRDR TFR, ATC radar coverage around R-2206 is very limited below 5,000'. With no requirement for ADS-B Out in this area, the actual number of VFR aircraft transiting the vicinity of Clear Air Force Station is virtually impossible to estimate accurately.

The rationale of the polygons in the EA for rerouting may make sense for higher altitude traffic; however, it does not adequately take into account the lower level VFR traffic. The reroute distances will be longer than estimated in the EA due to rising terrain to the south, which prohibits rerouting until much closer to the proposed airspace.

The EA's cost evaluation that only included fuel for determining flight cost is naive and disingenuous. Engine and other component overhaul intervals are also directly affected by increase flight times. The estimated additional cost due to reroutes is not accurate and needs to extend beyond just additional fuel cost to encompass the actual operational price of an aircraft. For some aircraft, fuel is the cheapest component of the hourly operating cost.

It has come to the attention of the Alaska Airmen Association that after performance testing is complete and the radar becomes fully operational, R-2206C, and R-2206F could without warning or notification have High Intensity Radio Frequency (HIRF) levels above the safe limit due to operational needs. MDA has stated that "for reasons of operational security, there can be no prior notification for the lower zones going hot." This is an unacceptable risk from a civilian's perspective, and the Alaska Airmen Association can not support it. It is too risky to encourage pilots to fly in R-2206C & R-2206F outside of the published or NOTAM'd times. There is a real and tangible need to have light signals and a radio frequency to monitor while in the vicinity of the Clear LRDR so that pilots can be notified immediately when R-2206C & R-2206F goes hot outside of scheduled or NOTAM'd times.

The LRDR performance testing period is the ideal time to implement these mitigations to a safety risk that the Alaska Airmen Association considers unacceptable. The Safety Risk Management Process of the FAA did not tackle this risk. It is the opinion of the Alaska Airmen Association that the Safety Risk Management Panel was too heavily weighted to IFR operations and lacked the background, expertise, and knowledge of VFR traffic and VFR practices in the vicinity of the LRDR.

It is our understanding that the actual area of safe HIRF levels has a sloping floor, and the FAA's system of airspace design can not accommodate such depictions. It is also our understanding that along the Parks Highway, the safe HIRF limits are well above the proposed TFR and the final airspace design floor. The Alaska Airmen Association requests that a notch be cut into Zone 2 during the Performance Testing period, and then in R-2206F along the Parks Highway that would allow bi-directional traffic up to 3,000 AGL. This cut-out would allow a prominent visual landmark to remain outside of the Special Use Airspace, making it much safer for VFR traffic to transient the area and not be unnecessarily limited to low altitudes.

The Alaska Airmen Association looks forward to continuing to work with the Missile Defense Agency, and the FAA is coming up with mutually beneficial ways to protect and defend the United States while still being able to live and work in Alaska.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam White", with a long horizontal flourish extending to the right.

Adam White
Director of Government Affairs