

February 28, 2001
Manager, Air Traffic Division, AGL-500
Federal Aviation Administration, Great Lakes Region Headquarters
O'Hare Lake Office Center
2300 East Devon Avenue
Des Plaines, IL 60018

Dear Mr. Blum:

I respectfully submit my objection to the proposed expansion of the Minneapolis-St. Paul (MSP) Class B airspace. The proposal places undue safety, operational, and economic burdens on the general aviation community, particularly on the soaring community and on both the Stanton Airport and Bensons Airport. I am a member of the Minnesota Soaring Club and I support its analysis and recommendations relative to the FAA's proposal.

Summary

I note many adverse impacts of the FAA's proposal to expand the MSP Class B airspace and urge the FAA to modify its proposal and to create additional Class B airspace only where the benefits clearly outweigh the negative consequences.

If additional Class B airspace is created as proposed, the impacts will include:

- Reduced safety. Altitude restrictions will cause gliders to land off-airport or to crash following a decision to try to reach the airport; altitude restrictions will compress VFR traffic and will increase the potential for collisions, including collisions involving tow planes and gliders.
- Reduced soaring activity. Altitude restrictions will make cross country soaring difficult at Stanton and impossible at Bensons Airport and the proposed expansion east of MSP will end the trophy flying currently practiced between Stanton and Bensons Airports. Without opportunities for safe cross-country soaring, pilots will lose interest in soaring.
- Reduced pilot training activity. Reduced opportunities to soar and to complete badge, record, and trophy flights will discourage pilots and potential pilots from flying and from seeking pilot certificates.
- Airport closing. Reduced soaring and other flight activity, combined with elimination of skydiving at Stanton, will increase the per flight cost of all operations at both the Stanton and Bensons Airports, which will further decrease activities at these airports. Either or both airports may close as a result.
- Impacts on aviation at other airports. The proposed expansion will increase delays and the costs of flying to and from other airports under the proposed expanded Class B airspace.

- Environmental impacts. Low flying large aircraft in the Class B and low flying small aircraft below the Class B will disrupt residential and wildlife environments below the Class B airspace.

To minimize these impacts while safely accommodating increased traffic at MSP, it is recommended that the present Class B airspace be modified by addition of a corridor, not more than 15 nm wide, centered on the parallel runways 12-30, and extended to no farther than necessary beyond 20 nm and not more than 30 nm from the center of the Class B, with floors as high as possible. This expansion will facilitate simultaneous parallel approaches to those runways. While it will eliminate trophy soaring between the Stanton and Bensons Airports, it will not affect other aspects of flight at those and other airports as much as the initial proposal. Note that aircraft operating within 30 nm of MSP are presently required by FAR 91.215 (b)(2) to operate a transponder with Mode C capability from the surface up to 10,000' MSL, making them visible to both ATC and the TCAS equipped aircraft and alerting both ATC personnel and flight crews of potential conflicts. While gliders are exempt from the transponder requirement, those without transponders are excluded from the present Class B and from airspace within a 30 nm radius from 8,000' to 10,000' MSL.

The reports and information available at this time from the FAA do not demonstrate how expanding the Class B other than for the recommended corridor will increase safety. Therefore, it must be concluded that the adverse impacts of expanding other than for the recommended corridor are not balanced by any significant enhancement of safety.

In addition to urging modification of the proposal, I note that the FAA committed, at the January 13 meeting, to create an ad hoc User's Group Committee to assist the FAA in evaluating the impacts, assessing alternatives, and recommending revision of the proposal. I request a seat on that Committee for the Minnesota Soaring Club's representative.

I attach a copy of the Minnesota Soaring Club's analysis to support my response to the proposal.

I appreciate the opportunity to comment on the MSP proposed Class B airspace expansion and ask that the FAA take immediate steps to suspend this proposed airspace action and resume study of the issue, with assistance from and discussion with local users to address their concerns, without regulatory action.

Yours truly,

Attachment: Detailed analysis of the FAA Proposal.