

February 9th, 2026

JPARC Airspace EIS

C/O Stantec

501 Butler Farm Road, Suite H

Hampton, VA 23666



RE: JOINT PACIFIC ALASKA RANGE COMPLEX, REGIONAL SPECIAL ACTIVITY AIRSPACE OPTIMIZATION PROGRAM, ENVIRONMENTAL IMPACT STATEMENT

The Alaska Airmen's Association is a non-profit General Aviation (GA) organization representing over 2,000 members. For 75 years, our mission has been to "Promote, Protect, and Preserve General Aviation in Alaska." Our membership includes pilots, mechanics, aircraft owners, and other aviation enthusiasts. On behalf of our members, please accept the following written comments on the scoping phase of the Joint Pacific Alaska Range Complex (JPARC) Airspace Optimization Environmental Impact Statement (EIS).

As fellow aviators, the Alaska Airmen's Association fully understands and supports the importance of consistent, relevant, and adequate training for our military. However, we have serious concerns about the scope and scale of the proposed airspace changes and their impact on our access and ability to travel throughout the Great State of Alaska.

While civilian VFR activity within Military Operation Areas (MOAs) is permitted by the Federal Aviation Administration (FAA), it is unwise to mix Super Cubs and fifth-generation fighters at 500 feet AGL, given the very little time to deconflict. Historically, the civilian community has tried to work around the military's training schedule; however, given the proposal's sheer size and scope, this is now unrealistic. We simply cannot impede travel and commerce to the extent the military proposes to meet its training needs.

The Special Use Airspace Information Service (SUAIS) must expand in parallel with any expansion of the airspace. This ability to provide real-time information to the civilian aviation community has significantly enhanced safety, as evidenced by the absence of civilian-to-military midair collisions in the JPARC. The civil aviation community must know when and where military traffic is within the special activity airspace. The Alaska Airmen's Association recognizes that this is a significant financial burden on the military, but these economic impacts must be evaluated in the EIS process. If the military cannot afford SUAIS expansion, the airspace must be curtailed to match the investment the military can afford to implement and maintain. It is also important to the civilian aviation industry that the operational status of SUAIS be a mitigating factor for airspace activation; in other words, if SUAIS is unavailable, the airspace is not available for military training.

Real-time IFR coordination with civilian traffic is also imperative for safety and to reduce the proposal's economic impact. The FAA's insistence that Part 135 operators fly under Instrument Flight Rules (IFR) whenever possible (even in good weather) is in direct conflict with the military proposal for expanded special activity airspace. The Alaska Airmen's Association has made this request numerous times in previous proposals, but has been dismissed as not feasible or workable. The FAA is going through a major redesign and upgrade of its air traffic control systems nationwide. Now is the time to think outside the box and develop ways to share the airspace in real-time, allowing civilian IFR traffic to fly through all Special Activity Airspace while the military continues to fulfill its goals and needs.

Any disruption to the public's ability to travel or any delay in commerce has a negative economic impact. This impact is often difficult to quantify. Dr. Mike Jones, an economist at the University of Alaska, has conducted extensive research showing that even small disruptions in air carrier service have a direct financial impact on Alaska's rural communities, their access to healthcare and healthy foods, and the basic quality of life. The Alaska Airmen's Association strongly recommends that Dr. Jones and his research be considered when evaluating the economic impact of the military's proposal. *Mike Jones, Ph.D., University of Alaska Anchorage, Institute of Business and Public Policy, 850-597-2289, msjones6@alaska.edu.*

In summary, the Alaska Airmen's Association fully understands and strongly supports the military's desire for better opportunities to conduct consistent training that reflects an ever-changing battlefield; however, serious environmental and economic impacts must be considered. We look forward to continuing our partnership with the military and developing a balanced solution that benefits both civilian and military users of this tremendous resource Alaska offers in our airspace.

Sincerely,

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

Adam White
Government Affairs Advocate,
Alaska Airmen's Association