

Dear Sirs:

I am writing to comment on proposed Special Federal Aviation Regulation No. 50-2 concerning Special Flight Rules in the Vicinity of Grand Canyon National Park.

I am a private pilot and have owned and flown my own airplane since 1989 for business and personal travel. I strongly oppose the proposed changes to the special flight rules area because it effectively erects a barrier in my flight path and restricts my options for circumnavigating high terrain and weather in route to destinations in the desert south west.

The SFRA restrictions affect (1) route options for dealing with adverse weather, terrain and traffic, (2) altitude options due to limited supplemental oxygen supply and refilling availability, and (3) fuel consumption and stops.

The proposed ceiling of 14,500 feet is very close to the service ceiling of my Cessna 182. Like many private pilots, I carry a portable oxygen system in order to cross mountain ranges such as the Sierra Nevada at safe altitudes. The oxygen system I carry has enough capacity to serve the pilot and three passengers for one round trip crossing of the Sierra Nevada from California to Arizona. Most airports that serve general aviation aircraft do not have the equipment necessary to refill oxygen systems, and this is particularly true of the unattended airports in outlying areas that I frequent.

If the top of the SFRA is extended to 14,500, I can choose either to circumnavigate the entire area, which will tax my aircraft's fuel capacity and require additional fuel stops, or climb above the SFRA and go back on oxygen. If I use the oxygen, however, the system will be too depleted to allow me to climb over the Sierra Nevada range on the way home. Thus, I must either circumnavigate the SFRA or circumnavigate the Sierra. In either case, the deviation can be several hundred miles and over three hours, depending on the destination and weather. The significant amount of restricted airspace in southern Nevada and around Edwards AFB can combine with summer thunderstorms to completely foreclose a low level flight.

Decreased safety is the most significant problem presented to me personally by the SFRA. By erecting a massive barrier across the Colorado Plateau, the SFRA restricts my ability to circumnavigate thunderstorms and winter weather without placing me too close to hostile high terrain or active military training areas.

The proposed regulation compromises the safety of and imposes disproportionate burdens on a limited number of private pilots and lower-powered general aviation aircraft. I urge you not to implement the regulation as currently drafted and to rework it to include simple, useable transitions for general aviation pilots and aircraft.

Thank you for your consideration.

Very truly yours,

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