

Detroit Class B Airspace Reconfiguration Ad-hoc Committee  
Comments and Recommendations  
February 19, 2010

Meetings

The following committee meetings were held; additional committee communication and work was done via email.

November 12, 2009 – Eastern Michigan University, Ypsilanti, MI

December 10, 2009, - EMU Flight Center, Willow Run Airport, Ypsilanti, MI

February 19, 2010 – Novi, MI (In conjunction with the Great Lakes Aviation Conference)

Committee Mission

The committee agreed at the first and subsequent meetings that its purpose would be to solicit input from members on how the proposed airspace reconfiguration would affect each member organization. These comments, along with specific suggestions for modifications, would be collated and presented to the FAA.

No attempt has been made to reach a consensus among individual members. Rather, each member organization which submitted comments would be represented in the final report.

Member Organizations

Michigan Department of Transportation

Eastern Michigan University

Monroe Aviation

University of Michigan Flyers

Wayne County Airport Authority

U.S. Coast Guard Air Station Detroit

OAM CBP Detroit

Plymouth Mettetal Airport

Dearborn Flying Club

Civil Air Patrol

127<sup>th</sup> Wing Selfridge ANGB

Dawn Patrol Flying Club – Mettetal Airport

Aircraft Owners and Pilots Association

Michigan FAAst Team

Michigan Business Aircraft Association

Skydive Tecumseh

Adrian Soaring Club

Kalitta Charters

Summary

The committee is of general agreement that the current configuration of Detroit Class B Airspace is antiquated and in need of revision to accommodate new runways, new

approach procedures, and increased traffic. Furthermore, the committee considers safety (for all aircraft) as paramount and recognizes that certain operators may be inconvenienced or be required to adopt new operating procedures as a result of the reconfiguration.

At the same time the committee expects the FAA to carefully consider the comments and recommendations contained in this report as well as serious and responsible comments and recommendations received from the future public comment process.

#### Member Comments and Recommendations

The following is a compilation of comments received from individual member organizations:

**Eastern Michigan University Aviation** – Existing practice area south of ARB would become unusable. This would likely concentrate many more training aircraft into another existing practice area north of ARB, resulting in congestion and an increasing the risk of an in-flight collision.

**Skydive Tecumseh** – SDT’s concerns regarding being in Class B airspace:

We feel that although a letter of agreement has been proposed this does not sufficiently protect the operation. The reason for this concern is that policy can change and once in Class B airspace we would be subject to changes in policy by the administration. We need to be able to operate back to back loads at least every 20 minutes on a busy day. We would not be able to expect priority response from Detroit Control. Our ability to operate loads back to back without interruption or delay is crucial to our ability to stay in business. This does not reflect on our present relationship with control, which I feel has been an excellent one. It is more about the concern that policy can change (management changes, reduced staff numbers, different priorities etc) and regardless of what a letter of agreement may say it would still be within your power to say “sorry but this is the way it has to be”. We would obviously prefer to stay outside of Class-B airspace and maintain our present relationship with control. I have attached a proposed cut-out which would allow Skydive Tecumseh to operate flying patterns which show due consideration to neighbors. I would request that this be given serious consideration.

Additionally, the following brief about their operation was submitted:

Statistics and information about Skydive Tecumseh’s operation:

We operate at least 1500 loads (take off and landing) in a 7-month period.  
This represents approximately 80 operational days giving an average of 18.75 loads per operational day.

Peak season days can see at least 40 loads per day mostly at weekends.  
The operation relies on being able to turn loads back to back without delay.  
Here’s how the math works for a load:

- Average load takes 0.3 of a hobb with a variance of +/- 1 minute.
- Aircraft cost at \$650 per hour is \$195.
- Fuel cost at 25 gallons is \$85.
- Total cost: \$280.
- Income from a load with 14 jumpers on it @ \$24.00 per jumper is \$336.
- Now, a delay in the air of just 5 minutes waiting for control:
- Load now takes 0.38 of a hobb.
- Aircraft cost at \$650 per hour would now be \$249.
- Fuel cost would increase to around \$95
- Giving a new cost total of \$344.
- Income is still \$336 giving a net loss.

As you can see from the above our operation relies on being able to ascend and descend safely in the shortest possible time. We generally fly to 13500ft climbing all the time. Any time wasted on a regular basis would affect the viability of the operation. The above math gives consideration only to per head costs and income. A large part of our income comes from tandem operations. If we were to lose even 2/3 loads a day due to control holds we would see a significant reduction in the ability of the operation to support its costs. Over 12,000 skydives are made in a season making us one the most significant skydive training centers in the Midwest.

We have 34 members of staff who, in varying degrees, rely on us for the seasonal income they earn; these people earned over \$250,000 in the 7-month period. Our operation brings a significant boost in traffic to local businesses. It is difficult to estimate but we believe we represent a multi-million dollar boost to the local economy. We have a great relationship with the local community who gives us their full support. Our numbers are projected to grow. In the past 2 years we have seen an increase in business of 25% per annum. As the economy recovers we expect to see continued growth and as a result more aircraft activity. We would ask that serious consideration be given to our proposed adjustment to the planned airspace or indeed the AOPA's proposal. We are very concerned that during busy times ATC would simply be unable to work with us in a timely manner, as they would have more important traffic to take care of. The proposed adjustment seems to still allow you to achieve you aims without having us to take care of. The airspace we have marked out allows us the flexibility to fly patterns that have a minimal impact on the local community.

**Michigan Department of Transportation** – MDOT agrees that the current Class B configuration is antiquated and is supportive of the proposed changes. However, it is important to consider any unintended consequences, such as the concentration of many training aircraft in one area. It is ironic that ATC is required to provide services (to pilots who request them) in the vicinity of airports with Class C airspace and TRSAs while this requirement does not exist in the vicinity of the nation's busiest airports, those with Class B airspace. The all-too-frequent reality is that VFR pilots requesting flight following and other ATC services are often refused because of controller workload. This forces VFR aircraft to operate in a "wild west" type environment and deprives them of one of the

most effective tools in avoiding collisions: ATC advisories. As part any airspace redesign, we suggest that Detroit Approach Control establish (a) position(s) dedicated to providing these services to VFR pilots, especially in the areas where intensive flight training is conducted.

**Civil Air Patrol, Great Lakes Training Squadron** - Defining the airspace using a radial distance off the DME antenna for one of the DTW ILS's is unworkable for all aircraft not specifically going into DTW. They simply would not have that DME tuned in -- even if they had a DME which most GA aircraft do not have. The airspace needs to be defined by a radial distance from the DTW airport reference point that is in all GPS and LORAN databases. This is a navigational fix that most aircraft could use. Because DME antenna locations are not usually co-existent with a plotted waypoint commonly in navigation databases, this makes a poor choice for defining the Class B airspace under the existing map or the proposed new map.

**Monroe Aviation** – Submitted the following description of their current practice areas:

Attached is a drawing of the two practice areas used by Monroe Aviation School of Flight. The first and primary is West of the airport; West of US23 and South of M50; the second is Southwest of the Airport as depicted. Both are described below:

Designated Practice Areas (see attachment)

1. Local practice area #1 (see attached chart excerpt) is located South and West of Monroe Custer airport bounded on the East by highway I-75 on the North by highway M-50 on the West by highway US-23 and on the South by prominent power lines running approximately from Ham-A-Lot airfield to the village of Erie.
2. Local practice area #2 (see attached chart excerpt) is located West Southwest of Monroe Custer airport bounded by highway US-23 on the East, highway M-50 on the North and prominent railroad tracks on the West Southwest and Southeast.

**AOPA** – Suggested the following alternate airspace design:

The purpose of the FAA's proposed modification of the Class B is to provide improved containment of traffic being vectored to and from the primary airport. The FAA's proposal to expand the Detroit (DTW) Class B vertically and horizontally appears to be excessive and unnecessary. The following suggested design is an alternate to the FAA's proposal and is submitted to the ad hoc users group for consideration. It is intended to provide a basis for further discussion, including other ad hoc recommendations, and modification by the group.

The top of the DTW Class B airspace should remain at 8,000 feet MSL. Raising the top to 10,000 feet will be more restrictive on aircraft overflying the area when not able to access the Class B airspace. No evidence was submitted that there are safety problems with the existing upper limit of the Class B. Air traffic control

should provide flight following and traffic information to VFR flights transiting the area above the Class B airspace.

The outer boundaries of the Class B should be limited to 25 NM and only where such extension is necessary. This is illustrated in the following diagram depicting extensions to 25 NM based on the FAA briefing regarding the airspace needed for parallel ILS approaches. These extensions should provide the airspace needed to contain the traffic for left and right base leg radar vectoring. Typically these base legs are conducted at approximately 17 NM but may be extended during peak arrival periods.

Extension of the Class B horizontal boundaries to 30 NM in all quadrants as proposed by the FAA would have adverse safety and economic impacts on outlying airports and operations. These impacts would restrict flight training airspace used by schools based at Willow Run and Ann Arbor airports, glider operations and skydiving activities in the area southwest of Detroit, and overly the Hudson County airports north of Detroit. The western boundary should remain basically the same as the existing boundary. If an extension at 4,000 feet MSL to the northeast is necessary, as shown in the following diagram, it should be evaluated for its effect on Oakland – Troy Airport.

The Class B floors above Class D airspace should have only one height, i.e., should not have 2 different Class B heights as shown in the FAA proposal above the Young Airport Class D airspace, a configuration that can lead to confusion and potential violations.

The airspace along the Detroit River below the existing Class B configuration provides a valuable VFR flyway for traffic transiting the area to the northeast and southwest and arriving and departing Grosse Ile airport. The FAA's proposal would narrow the width of that flyway below 3,000 feet between the existing western boundary and the Canadian border in the vicinity of Grosse Ile, and lower the Class B floor to 2,500 feet on the southern portion. It is essential to provide as much airspace as possible outside the Class B for that flyway to prevent compression of VFR traffic into a very narrow corridor. A wider corridor would also assist pilots in avoiding violations of US Customs and Border Patrol regulations resulting from unintentional border transgressions.

This flyway airspace can be improved by terminating the boundary of the FAA proposed 2,500 foot Class B shelf south of DTW. This Class B floor should not extend to the northeast beyond the nuclear stacks depicted on the charts. Also, the western boundary at 3,000 feet should be established by using the railroad tracks or highway as visual references, as applied in the existing configuration, and extended further to the west in the vicinity of the Ford Headquarters building as shown in the following illustration. In addition to defining the flyway with landmarks for navigation, the FAA should work with local pilots to establish VFR waypoints.

**University of Michigan Flyers** - The Michigan Flyers operate several club aircraft either for the enjoyment of members or for the training of members for the private, commercial, instrument & flight instructor. Typical VFR training is done just west of Ann Arbor airport. There is no strictly defined 'practice area' per se, but operations are within a 15-20 mile radius extending west, north & south of KARB; most of our training operations are directly west of KARB. See attached diagram.

In our depiction of the practice area west of KARB, maneuvers for the private pilot license in this area are typically inside the 30 NM veil of class Bravo, DTW. For the commercial and flight instructor licenses, maneuvers are performed at 4000 – 6000 feet, west of KARB. We may or may not be in radio contact with any facility during the demonstration and practice period. We don't spend much time above 6000 feet unless on a cross country. Take off & landing practice are typically in Delta airspace at KARB with constant communications. Training takes place predominantly in VFR weather conditions; the following are the most numerous training flights per month for the Michigan Flyers: June 445 flights, July 477 flights, August 435 flights (the busiest months). Private pilot maneuvers such as steep turns, stalls, unusual attitudes, minimum controllable airspeed and emergency procedures (such as simulated engine failure) are conducted during training sessions for the private license. For instrument training, we are in constant radar and communications contact with either KARB, KYIP, KDTW, or KPTK, working within the Detroit Approach system.

The following numbers for the Control Tower Traffic at KARB, total operations by fiscal year, may be helpful to the committee:

2009 = 57,009

2008 = 69,238

2007 = 72,895

2006 = 71,250

2005 = 65,944

2004 = 68,531

2003 = 79,661

(numbers are taken from p.1, Michigan Airport Directory, Air Traffic Activity System, [www.apo.data.faa.gov](http://www.apo.data.faa.gov))

**Plymouth Mettetal Airport** - Basically our instructors and pilots recognize a need for the class B airspace changes. We understand the concerns of Eagleflight and Monroe. What our pilots don't understand why they can't add practice areas to the west. At the first meeting Eagleflight was concerned they would lose students if they had to fly further to reach the practice area. Our practice area is roughly 10 miles north-west of Mettetal. It has never been an issue to fly this distance to reach the practice area. If Eagleflight and Monroe moved their practice areas West they would be clear of the proposed class B airspace.

The main concern brought up by our pilots and instructors was the load that could be added to the controllers. The flight school at Mettetal has about 30 students and 60 renting pilots. We also have 129 tenants on the field. Most of the flights out of Mettetal are VFR. While we encourage our students and pilots to avail themselves of the controllers services for flight following, the majority do not. If the Bravo airspace changes, contacting a controller at Metro will become a routine part of training and recreational flights out of Mettetal. We are sure the same is true for the other airports affected by the proposed changes. Our concern is that the controllers, who don't always have time now for VFR flights, will be overloaded.

**Adrian Soaring Club** – For gliders, altitude is our fuel & safety. Forcing under 6,000 ft. boundary will raise issues particularly along corridor shown and SW 4,000 ft. ceiling. (See graphic depicting areas of intensive glider operations.)

#### Committee Recommendation

The committee is represented by a diverse group of organizations, each with its own interests and concerns. Therefore, as mentioned above, the committee has elected to have comments from each member organization receive equal mention in this report.

Finally, committee members are in agreement that we appreciate the opportunity to make a meaningful contribution to aviation safety in Southeast Michigan.

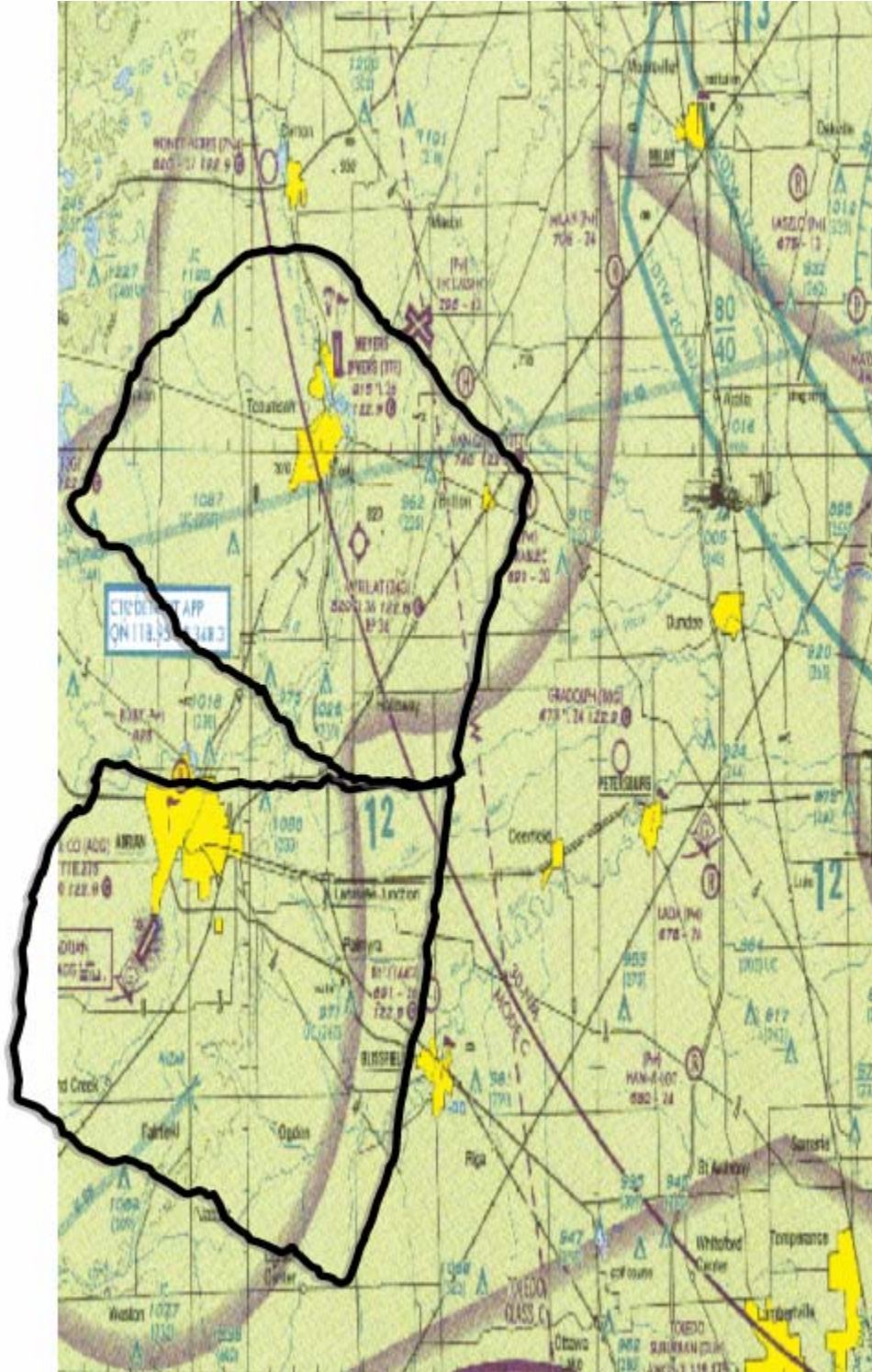
Respectfully Submitted,  
Thomas S. Krashen, Committee Chair  
Michigan Department of Transportation

#### Attachments

1. Graphics
2. List of committee members

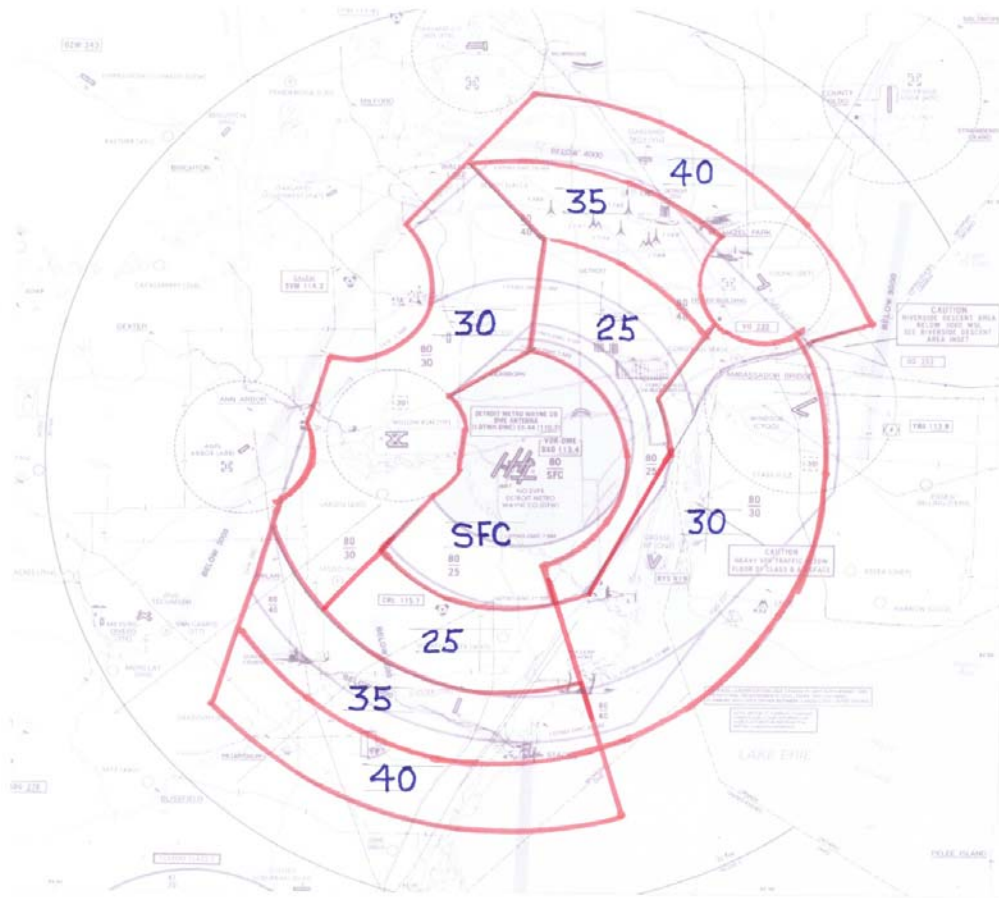
# Graphics

## Monroe Aviation Practice Areas



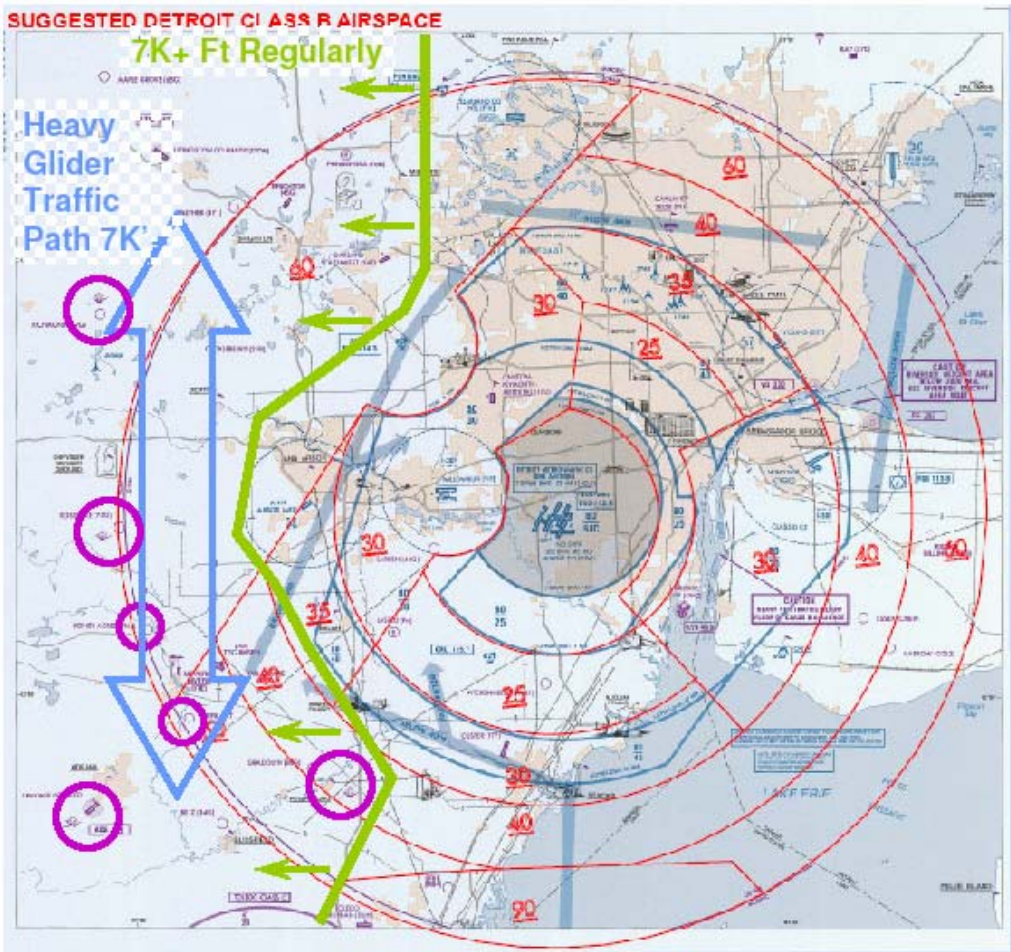


# AOPA's Suggested Airspace Design





# Adrian Soaring Club



## Committee Members

<b><u>Name</u></b>	<b><u>Organization</u></b>	<b><u>email</u></b>
Tom Krashen	MDOT	<a href="mailto:krashent@michigan.gov">krashent@michigan.gov</a>
Phil Tartalone	EMU	<a href="mailto:ptartalone@mac.com">ptartalone@mac.com</a>
Alex Bloye	EMU	<a href="mailto:alex@eagleflighttraining.com">alex@eagleflighttraining.com</a>
Jerard Delaney	Monore Aviation	<a href="mailto:jerry@netmichigan.net">jerry@netmichigan.net</a>
David DiMaria	Wayne Co. Airport Authority - YIP	<a href="mailto:david.dimaria@wcaa.us">david.dimaria@wcaa.us</a>
Lcdr. Daniel Unruh	USCG Air Station Detroit	<a href="mailto:daniel.d.unruh@uscg.mil">daniel.d.unruh@uscg.mil</a>
Dale Foerschler	OAM CBP Detroit	<a href="mailto:dale.foerschler@dhs.gov">dale.foerschler@dhs.gov</a>
Helen McLaren	Mettetal Airport	<a href="mailto:hmclaren@emich.edu">hmclaren@emich.edu</a>
Louise Egan	Dearborn Flying Club	<a href="mailto:louiseegan@att.net">louiseegan@att.net</a>
Mario Accardo	CAP	<a href="mailto:maccardo@cap.gov">maccardo@cap.gov</a>
Clint Hoover	127 Wing Selfridge ANGB	<a href="mailto:clinton.hoover.1@ang.af.mil">clinton.hoover.1@ang.af.mil</a>
Alan Stewart	Dawn Patrol Flying Club - Mettetal	<a href="mailto:astewa7552@aol.com">astewa7552@aol.com</a>
Hal Becker	AOPA	<a href="mailto:hal.becker@att.net">hal.becker@att.net</a>
Jerry Stewart	Stewart Aviation Services Adrian	<a href="mailto:jerrydstewart@yahoo.com">jerrydstewart@yahoo.com</a>
Tom Kennedy	FAAst Team	<a href="mailto:tjk1alpa@aol.com">tjk1alpa@aol.com</a>
Randy Coller	MDOT	<a href="mailto:collerr@michigan.gov">collerr@michigan.gov</a>
A.C. Jayne	UofM Flyers	<a href="mailto:jayneacj@umich.edu">jayneacj@umich.edu</a>
Roger Salo	MBAA	<a href="mailto:Roger_salo@mascohq.com">Roger_salo@mascohq.com</a>
Franz Gerschwiler	Skydive Tecumseh	<a href="mailto:franz@skydivetecumseh.com">franz@skydivetecumseh.com</a>
Mark Coleman	Adrian Soaring Club	<a href="mailto:Arkley68@yahoo.com">Arkley68@yahoo.com</a>
Bradley Clark	Kalitta Charters	<a href="mailto:bclark@kalittacharters.com">bclark@kalittacharters.com</a>
Diane Walker	Wayne Co. Airport Authority	<a href="mailto:dianne.Walker@wcaa.us">dianne.Walker@wcaa.us</a>
FAA		
Tim Funari	FAA	<a href="mailto:tim.funari@faa.gov">tim.funari@faa.gov</a>
John Hoelscher	FAA	<a href="mailto:John.CTR.Hoelscher@faa.gov">John.CTR.Hoelscher@faa.gov</a>
Gary Ancinec	FAA	<a href="mailto:gary.f.ancinec@faa.gov">gary.f.ancinec@faa.gov</a>
Roger McGrath	FAA	<a href="mailto:roger.mcgrath@faa.gov">roger.mcgrath@faa.gov</a>
George McMahon	NavCanada	<a href="mailto:mcmahog@navcanada.ca">mcmahog@navcanada.ca</a>
John Guth	FAA DTW ATCT	<a href="mailto:john.guth@faa.gov">john.guth@faa.gov</a>