



To: Councilman Carlesimo
From: DY Consultants
Subject: Response to Questions Dated December 4, 2009
Date: December 10, 2009

Thank you for the opportunity to respond to your ten questions.

1. At the last workshop, you reported that the FAA would not agree to downgrade the airport to a lower Airport Reference Code category. Please confirm that I am correct.

We have mentioned in the past that the FAA would be reluctant to lower the Airport Reference Code from a C to a B. Many airports petition the FAA to restrict traffic at airports via different methods such as noise restrictions or weight limitations, and the FAA is very sensitive to requests to reduce/restrict aircraft operations. This is based on past experience in dealing with the FAA. Also exaggerated operation numbers have been accepted for so long at Venice that it becomes difficult to overcome this accepted belief, especially when many decisions have been based on these numbers. However as time has progressed and we received more and more accurate operational data from the camera count at the airport, we now see that there may be sufficient data to justify a request for Venice to have a B designation.

2. At the last workshop, you reported that the FAA would not agree to the use of declared distances to shorten Runway 31. Please confirm that I am correct.

Declared distances is a tool that many airports use to achieve standard FAA runway safety area dimensions. They cannot be used without the review and approval of the FAA. Declared distances are more appropriate for larger airports, since pilots need to be diligent about runway lengths available and many feel that that diligence occurs more at larger airport with commercial aircraft, although declared distances have been used at General Aviation airports.

3. In your professional opinion, is a traffic count, conducted during a severe economic environment, compounded by the fact that aviation traffic is down by as much as 50%, and made worse by the physically poor condition of Runway 04/22 representative of how our airport should be classified?

The existing camera traffic count provides excellent data on the current use of the airport. With this data and data associated with fuel sales, accurate estimates can be determined for past operations. The methodology of using past fuel sales is an FAA and industry accepted standard since an economic upturn or downturn which would affect number of operations would also affect fuel sales in the same proportion. Hence fuel sales can be used as a direct indicator of operations. Forecasting into the future also uses FAA and industry standard methodologies such as Socioeconomic Regression (based

on population, income, and employment), Market Share Analysis (Constant share, Dynamic market share) and Trend Analysis. The counts that are being collected provide excellent data that can be used to base projections into the past as well as the future. We believe these estimates are much more valid than the estimates that have been used at Venice. Our data shows that the estimates that were used in the past are off by 300 to 400 percent.

4. If downgrades to a B-II airport are, 1) just paperwork as some have suggested; and 2) has no impact on the kinds of airplanes, (big or small, charter, fractional or personally owned), that land here now, why doesn't the FAA readily agree to a downgrade? Will we be able to keep runways in excess of 4,800 usable feet? I am told that this is important to some operators that currently use the airport.

The FAA is very reluctant to allow airports to downgrade, because of the precedent it sets. If the FAA allowed noise or weight restrictions or downgrades, a large percentage of airports would implement them and the aviation system would be greatly impacted. Also the FAA has invested large sums of funds into airports including Venice. At Venice, these funds were used to support dimensions associated with a C airport. Allowing Venice to be downgraded to a B airport would mean that those funds were wasted on larger dimension projects than necessary. You mention the possible loss of runway length if Venice Airport is downgraded to a B designation. In the letter to the FAA requesting concurrence with a B designation, it is suggested that if the FAA concurs with a B designation, Venice would be willing to maintain existing dimensions at the airport, many of which meet C standards. In addition, if the FAA participates in the rehabilitation of Runway 4-22, Venice would be willing to fund any existing dimension that goes beyond a B designation, such as runway length, width etc. We have done a runway length analysis for Venice based on B aircraft and have determined that 75% of B aircraft at 60% useful load would require 4,650 feet and 100% of B aircraft at 60% useful load would require 5,400 feet. We believe these numbers would justify FAA support for rehabilitation of runways at Venice at their present lengths even with a B designation. If designated a B, the FAA would probably not support the full 150 width (which is greater than a C designation) and Venice would need to provide the difference in funding from a B width to the current width.

5. I have met with the businesses currently operating on the field and listened to their concerns about all the current issues facing the airport. In the course of your business, have you ever conducted workshops with stakeholders, such as our airport businesses, where a downgrade in utility potentially harms their business?

Venice Airport currently meets B standards and in fact meets many C standards. Changing the designation from C to B would have very little impact on businesses. If you research documents that pilots use when making a decision to use an airport or runway, the designation of the airport is not published in any of them. If you queried pilots about the Airport Reference Code very few would understand what an Airport Reference Code is and what it means. Because of that we can say that a change in ARC from B to C would have little to no impact. The airport cannot deny access to aircraft regardless of the ARC. Since Venice would be willing to maintain existing standards even if designated a B, there would be no physical change in the airport.

6. What physical changes would be required of our airport for the city to declare it a B-II? Is this accomplished through runway markings, notices in the FAA airport directory or what? Please detail exactly what would have to be done to accomplish this. Please discuss any legal liability issues associated with changing the airport designation to a B-II without physically changing the runways and

notices to pilots.

No physical changes would be required if Venice Airport was designated a B. ARC is not published in the Airport Facility Directory, nor Approach Plates nor the Form 5010 nor any other documents that the public or pilots normally see. It is only published in the Master Plan and Airport Layout Plan. There are no legal liabilities that we are aware of.

7. Runway 4/22: If we accept that any airplane that comes here now can come here after a downgrade (and I don't accept that at this point) then what must be done to this runway to make it our best noise reduction runway? If it is a B-II runway, how will it be rebuilt? If the same C-II airplanes that use our airport want to continue to come, will a C-II airplane use or avoid a short, narrow B-I1 runway?

As we have stated in one of our responses above, Venice cannot deny or restrict access to the airport, whether it is a B or a C designation. Runway 4-22 currently has been designated the noise abatement runway. Venice publishes this in a number of ways such as on the message associated with their Automated Weather Observation System (AWOS). Use of a noise abatement runway is entirely voluntary. The way to make more pilots use this runway (without considering wind direction) is to make it more attractive to pilots. This can be accomplished by lengthening it or making it wider (both of which are impractical at Venice). Also instrument approaches could be added. This is possible for Runway 4, but difficult for Runway 22 because the draw bridge presents an obstruction.

8. The president of the Venice Airport Business Association has presented historical airport plans that strongly suggest that the only error in the 2000 ALP was that the runway protection zone at the departure end of runway 31 was too short. Is it technically correct to characterize that ALP as a B-II ALP and only the C-II designation was wrong? If so, what specific item(s) make that 2000 ALP a B-II ALP?

We believe that the document mentioned in your question presents the airport as a C airport with a mistakenly depicted Runway Protection Zone (as a B).

9. I am told that 13/31 is the primary runway. I understand that it has the instrument procedures that airplanes use in bad weather. If runway 04/22 becomes the C-II runway (as in the "hybrid" option), then what about the instrument landings and landing lights for that runway, how are they accommodated?

As we mentioned above, if Runway 4-22 becomes a C runway, instrument approaches could be added to Runway 4 but would be difficult for Runway 22 because of the draw bridge which currently causes the threshold to be displaced 294 ft. Again we reiterate that if the FAA concurs with a B designation and Venice will maintain existing standards, there will be no change to the airport. The instrument approaches would remain along with the approach lights.

10. In our last workshop, as a result of your visit to the FAA, council directed and the FAA recommended that you compile five years of historic traffic count data. Has there been any success with that task?

We currently have 8 months of very accurate operation counts for 2009. Using industry and FAA approved methodologies (such as fuel sales) we can accurately estimate operations for 2007, 2008

and 2009. We can also use FAA approved methodologies to forecast operations for future years. This gives us justification to estimate 5 years of operations. The FAA may accept the estimate or may require additional camera counts before being satisfied that sufficient actual counts have been taken to justify the estimates.