



U.S. Department
of Transportation
Federal Aviation
Administration

Orlando Airports District Office
5950 Hazeltine National Dr., Suite 400
Orlando, FL 32822-5024
Phone: 407-812-6331

January 8, 2010

Mr. Isaac Turner
Manager, City of Venice
401 W. Venice Avenue
Venice, Florida 34285

Dear Mr. Turner,

RE: Venice Municipal Airport (VNC), Venice, Florida
Request to downgrade facility to B-II Airport Reference Code (ARC)

This responds to your December 10, 2009 letter requesting the Federal Aviation Administration's (FAA's) concurrence to downgrade the Venice Municipal Airport's Reference Code to B-II.

We appreciate the thorough research efforts the City of Venice undertook to prepare this proposal. We understand you have used photographic aircraft counters on the airfield for several months to prepare actual aircraft traffic counts, and conducted extensive research to ensure the correct classification of each aircraft using the airfield during this time.

Based on the information contained in your letter, it appears that the City of Venice believes if less than 500 annual operations of C-II aircraft currently exist at the airport, the FAA will allow for the downgrade of the airport. This is not correct. For planning purposes, to determine the critical aircraft of an airport, it would be appropriate to calculate the largest aircraft, based on wingspan and approach speed, with either 500 annual operations or 250 annual departures. This critical aircraft would then be used to plan for future airport development, as well as establishing the basis to justify federal funding.

However, when a sponsor proposes to reduce the ARC, the FAA would not merely consider the critical aircraft of the airport, but all airport users and tenants. With existing based C-II aircraft at the airport, and other C-II itinerant aircraft, it would not be acceptable to downgrade the facility and cause potential impacts to users, including airport tenants whose livelihood is dependent on servicing these C-II aircraft. These tenants executed long-term leases and constructed facilities at the airport based on the understanding Venice Municipal Airport is designated as a C-II airport. Further, the forecast summary presented with this proposal indicates the C-II aircraft operations at

VNC will exceed 500 annual operations within the twenty year planning period. Since the purpose of the Airport Layout Plan (ALP) is to depict the facilities required to meet the forecast aviation demand, based on the forecasts you developed, it is not appropriate to prepare an ALP that does not accommodate the C-II aircraft.

Another reason that we cannot consider downgrading, is that the city made the case it was a C-II facility in 2006 and requested federal funding accordingly. The city accepted a grant of \$3,744,194 to rehabilitate Runway 13-31 to C-II standards. The city is obligated, based on the grant assurances, to maintain the utility of the airport to C-II standards.

Your letter also mentions even though you wish to designate the airport B-II, none of the safety dimensions would change at the airport, and no aircraft would be discriminated against by making this change to the ARC. However, the ALP is an official record for the airport, so it is not appropriate to downgrade the airport as depicted on this document, even if the facility would be maintained to the higher standard.

In reference to the forecasts, we did not receive a complete document detailing the methodology used to develop the forecasts, or a detailed explanation of the operations traffic count the City conducted. However, it is apparent that a downward adjustment to the numbers the City previously provided (and used in developing FAA's Terminal Area Forecast) will be warranted. We note that in extrapolating counts of aircraft operations to the whole year, weight was not given to the 3 to 4 month peak season. Please adjust the forecast accordingly and provide information on the forecasts methodology, so we can complete our review.

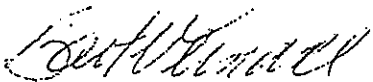
You also discussed the homes currently located in the Runway 13 Runway Protection Zone (RPZ). As you know, the RPZ is defined as an area off the end of a runway used to enhance the protection of people and property on the ground. While the FAA encourages acquisition of this land to the extent possible, it can be difficult and impracticable for an airport owner to buy the full RPZ. It is not unusual to have development in these areas, and the RPZ land use standards have recommendation status for that portion of the RPZ not controlled by the airport owner. Although we encourage the City of Venice to gain control of RPZ lands, the FAA is not mandating the City of Venice acquire these homes. Further, it should be noted that the RPZ, and its predecessor, the Clear Zone, have existed over these homes in question for many years. The 1969 ALP, which was prepared by the City of Venice, showed the Runway 13 Clear Zone extending into this residential neighborhood. The 2000 ALP, also prepared by the City of Venice, depicted a C-II RPZ, but the dimensions depicted were not correct. However, the RPZ is an imaginary airport protection surface, and it still exists at the C-II standard, regardless of how it is depicted on the ALP.

In reference to your concerns over the costs associated with achieving C-II standards, some FAA standards may be modified, if an acceptable level of safety can be met. While the FAA will not consider a modification to the runway safety area standards, other

standards, such as the object free area and taxiway separation standard, may be reviewed for modification at facilities where it is not practicable to meet the standard.

Although we cannot agree to downgrade the airport or primary runway, we are open to considering other alternatives you may have.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bart Vernace".

Bart Vernace, P.E.
Assistant Manager