

Venice Aviation Society, Inc. (VASI)

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September 24, 2009

Mr. Bart Vernace
Assistant Manager
FAA Orlando Airport District Office
5950 Hazeltine National Dr., Suite 400
Orlando, Florida 32822-5024

Dear Mr. Vernace:

I am writing to outline our concerns with the apparent contradictions between the Venice Municipal Airport (VNC) Land Use Inspection Report Corrective Action Plan of 4 September, 2009 and the City of Venice, Florida Comprehensive Plan (Comp Plan) submission to the Florida Department of Community Affairs (FDCA) of 25 August, 2009 as well as an apparent lack of urgency to correct known safety deficiencies. A number of pressing issues exist but we have chosen in this letter to focus on certain safety and land use questions.

On May 20 and 21, 2009, a land-use compliance inspection was conducted at Venice Municipal Airport , (VNC), Venice , Florida . The City of Venice 's Corrective Action Plan was submitted to the FAA Orlando Airport District Office (FAA) on 4 September, 2009. Ten days earlier, the Venice Comprehensive Plan (a land use planning document required by the State of Florida) was submitted to the Florida Department of Community Affairs (FDCA) for review and approval. Under Florida Statute, once approved, the Comprehensive Plan is the preeminent governing document for zoning and land use within the city. VASI provided comments throughout the preparation of the Plan. A copy of our final comments to the State was provided to

your office on 14 September 2009. The following comments reflect VASI concerns relative to the City's response and lack of compliance with deed reservations and restrictions and FAA grant assurances

Inspection Finding 1: Municipal Uses – Your report identified several City non-aeronautical uses of Airport property. The City uses a portion of the Airport for festivals, overflow parking and for special events...
“While the area is not currently being used for aeronautical purposes, it may be needed to accommodate future aeronautical development. Therefore, any non-aeronautical use of this property should be temporary unless otherwise approved by the FAA.”

City Response: Agree. Festival Grounds (page 9): A use agreement will be drafted by October 31, 2009 between the City of Venice and Airport for continuing to hold festivals on an interim temporary basis until aeronautical development demands require use of this area. The Comprehensive Plan does not allude to this area as a permanent festival ground. A written request for the Comprehensive Plan to reflect the interim temporary nature of use will be sent to the Planning and Zoning Department Director by the end of 2009 to record such a request.

VASI Comment: The most recent City Comprehensive Plan, sent to FDCA on 25 August, 2009, does state that the City intends to establish this area as a Permanent Fairground area under “Parks and Recreation land use,” Objective 14 Planning Area Practices, 14.6 C. The airport as a permanent location for a festival/fairground.”
Please note, during the current Airport Master Plan Update (MPU) process, VASI submitted a recommendation to the City to develop a portion of this area as a turf/grass runway to accommodate legacy and light sport aircraft. Clearly aeronautical, a grass runway meets a current need. Its design and construction could be funded by the \$561,032 “restricted net assets” in the Airport Enterprise Fund as an Airport Capital Improvement. Additionally a current Councilmember at a recent Airport Workshop affirmed the intention of the City to take airport property for permanent festival grounds.

Inspection Finding B: The City also permits the use of Airport property as a drop yard...several areas on the east side of the Airport were being used to store....vehicles...

City Response: Vehicle storage: The one vehicle on site will be moved to impound at the Venice Police Department by November 9, 2009.

VASI Comment: One vehicle on 21 May; in fact now as of 18 September, 2009 four vehicles are now parked in the area in question (see photo below).

Photo taken on 18 September 2009

The following recommendations were contained in the inspection report and would enhance Airport safety:

(a) Repaint taxiway edge markings on TW "A" and "B".

City Response: A Scope of Services for design will be executed within the next 6 months, per a FDOT (Aviation) grant received during State fiscal year 2008. Design is needed to reflect the latest FAA design standards.

(b) Repair/replace runway intersection signs; lighted runway intersection signs are recommended.

City Response: The Joint Automated Capital Improvement Program (JACIP) and the Airport Master Plan update, currently under way, include this and other necessary major maintenance projects. The Airport Master Plan Update will be presented to the City Council in January.

(a) Add a remark to the Airport Master Record, FAA Form 5010, that states standing water is present on RW 4/22 during and after periods of rainfall.

City Response: A letter from the Airport Director to the Designated Airport Program Manager will convey an appropriately marked Form

5010 to "notice" the standing water problem on Runway 4/22, within 30 days following FAA approval of the Corrective Action Plan.

(b) Repaint the centerline of RW 4/22

City Response: This project will be undertaken as part of the 80/20 FDOT (Aviation) grant program and rehabilitation of Runway 4/22 after the Airport Master Plan update and Airport Layout Plan are completed.

(c) Repaint the Runway Hold Markings for RW 4/22.

City Response: This project will be undertaken as part of the 80/20 FDOT (Aviation) grant program and rehab of Runway 4/22 after the Airport Master Plan update and Airport Layout Plan are completed.

(d) Repaint Closed Runway Markings on the Closed East-West Runway.

City Response: Part of the grant's scope of work for (a) above for CLOSED Runway 9/27

VASI Comment: Funds are currently available to accomplish these actions. The City's lack of any sense of concern or urgency concerning airport safety reflects the attitude of the City towards the airport. Winter and the onset of early sunset will soon be here. Why the delay in submitting the Form 5010? The rain will not stop. Why must safety wait until the MPU is submitted and reviewed? Given the history of Venice City Council inaction is it reasonable to expect an FDOT or FAA AIP Grant to rehabilitate Runway 4-22 and complete the work within the next 12 months? Marking the centerline of a runway is basic upkeep; mark it now and then again if needed. The Airport possesses a paint striping machine, why not use it?

An additional issue of great significance has surfaced since the FAA audit and the City's response. The City, by use of the recently submitted Comprehensive Plan and previous zoning actions, has effectively tried to insure a significant portion of prime airport property will never have any aeronautical or non-aeronautical development. We

urge the FAA to look into this matter further. This issue was identified in our comments to the State. However we are concerned that outside authorities do not appreciate the critical nature of this clever property taking action and the negative impact it will have on the aeronautical future and economic well being of the airport.

While other areas of concern remain, the above comments are provided to illustrate the need for greater City accountability regarding the Venice Airport . The on-going actions by the City do not reflect the tone of the response in the written audit response or any particular intention to recognize and comply with the FAA reports findings. By no means do we seek to physically expand the airport but what the VASI and we believe the FAA wants, is a safe, modern, well maintained, economically sound airport, neighborhood friendly to the extent legal and practical. Thank you for your interest in the Venice Airport .

Sincerely,

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CC: William Garrison, FAA Southern Region
Jeff Leopold, FDOT/1
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