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March 17, 2009

Mr. James G. Bennett, PE
District Aviation Specialist, District 2
Florida Department of Transportation
2198 Edison Avenue
Jacksonville, FL 322204

Re: Craig Airport Master Plan, FDOT January 22, 2009 letter

Dear Mr. Bennett:

Our responses to your comments 1-5 were addressed in a November 14, 2008 letter to Mr. Lampp of your office. We held a meeting on January 9, 2009 to review our comments and to the best of our knowledge we believe you had indicated at the January 9 meeting that our answers to these comments were satisfactory. If there is any additional information that you require on comments 1-5 please notify us as soon as possible.

In the same letter and at the January 9 meeting, the JAA noted FDOT's concern about the Master Plan and its consistency with the locally adopted Comprehensive Plan. At the January 9 meeting JAA indicated the changes requested by FDOT on this issue had been made and a copy was provided to Mr. Lampp. The Master Plan Analysis indicates that a runway extension is necessary to provide the runway length recommended by FAA Advisory Circular 150/5325-B, Runway Length Requirements for Airport Design, for the aircraft currently operating at Craig Airport. JAA understands that this issue must be addressed during the final development and approval of the proposed runway extension project. JAA anticipates this coordination will occur during the Environmental Assessment study for the runway extension. Resolution of this issue is a political decision by the local community. However this issue is resolved, the aviation need for the runway extension will not change.

At the January 9 meeting we also discussed in detail the steps we had taken to address citizen concerns about land use and the potential risk to the community in the event of a downed aircraft off the ends of the runways at Craig. FAA has established standards that require a runway safety area of 1,000 feet off each runway end and a Runway Protection Zone that requires height and land use controls that minimize the potential risks to the community. All of the proposed development at Craig meets these standards. These are the only land use controls proposed by FAA or the State of Florida for safety reasons. The off airport land uses at Craig in its current configuration and with the runway extension meet City of Jacksonville land use code requirements and FDOT land use code guidance.

Some community members have tried to invoke a land use standard not adopted by the City of Jacksonville nor recognized by the FAA or FDOT. This land use standard discusses accident potential zones that are based on an NTSB study of past accidents that have occurred over a ten year period throughout the United States. There is no attempt in the NTSB study to relate the accidents to any kind of statistical analysis that could be used to determine how likely an accident off airport property might be or if a particular type of aircraft is more likely to have an accident. There are only two states in the country that have even included this guidance in their state land use planning rules and these states have indicated it is still a local issue to determine if this guidance should apply.

While the Craig Master Plan was being developed, the City of Jacksonville undertook a review of the City Land Use Code related to Land Use around Airports. The City Planning Department and the City Council were aware of the more restrictive guidance that addressed accident potential zones. There was no support for adopting this guidance into the City of Jacksonville Land Use Code. If this standard were applied to airports throughout Florida many of those airports could be forced to close.

While all airport owners are concerned about safe operations from their airports some level of risk is inherent. The accident statistics in the NTSB Annual Review of Aircraft Accidents indicate that an aircraft operator is much more likely to have an accident on airport that in the areas off the runways. JAA believes that aircraft users operating on the available runway at Craig are at greater risk than an aircraft approaching or departing the airport. The FAA, the State of Florida and the City of Jacksonville have published guidance and Zoning Codes that control land uses around airports that do not preclude residential development off the ends of any runway except in the Runway Protection Zones for safety reasons.

JAA has received the FAA's final comments related to the Craig Master Plan and desires to publish the Craig Master Plan document. We will continue to work with the community to ensure any safety concerns are addressed in the Environmental Assessment study for the runway extension. We request that FDOT District Two release the document for final publication.

Please if you have any questions or require any additional information, do not hesitate to contact either me at (904) 741-2743.

Respectfully,



Hubert Seymour
Sr. Manager, Planning
Jacksonville Aviation Authority

Cc: John Clark
Charles Baldwin
Bill Ashbaker
Abdul Hatim
City Of Jacksonville Planning Department