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of Transportation
Federal Aviation
Administration

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January 8, 2008

Mr. Mike Moon, Manager
Witham Field
1871 SE Airport Road
Stuart, Florida 34996

Dear Mr. Moon:

RE: Martin County Airport, Stuart, Florida Runway 12-30

Thank you for taking the time to meet with us on December 7 in Washington, DC at the Federal Aviation Administration (FAA) Headquarters to discuss several issues concerning the Martin County Airport (SUA) in Stuart, Florida. We also thank Commissioner Heard for attending the meeting and conveying her views on these important issues.

At the meeting, we agreed to write to you regarding our views of the various proposals discussed concerning Runway 12-30 at the airport. This letter, written in coordination with FAA's Office of Airports Safety and Standards in Washington, DC, represents FAA's position on this matter.

Mr. Peter Kirsch, special counsel to the county, proposed on behalf of the county in his October 25 letter to reduce the available length of Runway 12-30 as a means to provide a standard Runway Safety Area (RSA) and to move the Runway 30 departure Runway Protection Zone (RPZ). The county's primary goal appears to be to move the departure RPZ for Runway 30, thereby removing homes currently located in that RPZ and to achieve a standard RSA for the runway.

Specifically, the county proposes to decommission at least 230 feet of Runway 12-30 on the Runway 12 end. The county also favors the use of declared distances for aircraft departing Runway 30 that effectively reduces runway length by 460 feet. For example, a takeoff on Runway 12 would start 230 feet farther down the runway, reducing the effective Takeoff Run Available (TORA) from 5,826 feet to 5,596 feet. Similarly, the TORA for a takeoff on Runway 30 would be reduced from 5,826 feet to 5,366 feet, by the use of declared distances, for a loss of 460 feet. Please see FAA Advisory Circular 150-5300-13 for information on declared distances.

We are mindful of the sensitivity of the local community to aircraft noise. FAA has responded to those community concerns by funding the acquisition of housing and the relocation of residents in the vicinity of the airport. In fact, FAA's national commitment to

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mitigate aeronautical impacts on local communities is reflected in the federal investment of approximately \$2 billion since 1982 in acquiring houses and relocating residents at the nation's public use airports. FAA has an equally important responsibility to develop a national system of airports and preserve access to those airports. This responsibility is reflected in both federal law and policy. FAA will not consent to access restrictions that have no identified basis or that adversely impact the utility of an airport when other non-access restricting alternatives are available.

Having said this, we want to work with the county to enhance the RPZs and the RSA on Runway 12-30 at SUA. However, FAA does not concur with the county's proposal for a number of reasons. First, we have no technical basis in FAA standards for removing any runway length currently available for takeoff on Runway 12. Second, the county proposes to decommission 230 feet for takeoff on Runway 12 and use the pavement as a taxiway. Since 2003, FAA has not considered such a taxiway configuration as acceptable because it increases the likelihood of runway incursions. Today, FAA has a national program to reduce the incidence of runway incursions, including the elimination of such aligned taxiways. Third, a reduction in takeoff runway length resulting from starting a takeoff farther down the runway is inconsistent with the need to enhance safety because of an increased possibility of an overrun following an aborted take off. Finally, we disagree with the assertion that the proposed reduction in available runway length will have no impact on the utility of the airport. We believe a reduction in available runway length of either 460 or 230 feet can have adverse impacts on users, particularly on operators of several aircraft types based at the airport or who routinely use it. Therefore, FAA will not approve an Airport Layout Plan update which depicts the decommissioning of any pavement on Runway 12-30.

Although the county's proposal is not acceptable to the FAA, we are nevertheless ready to assist the county in enhancing both RPZs and the RSA by other means that are consistent with FAA standards and do not adversely impact the utility of the airport. Specifically, if sufficient airport property is not available to meet the required RSA dimensions for Runway 12-30, FAA is willing to consider funding Engineered Materials Arresting System installations at either or both ends of the runway. With regard to RPZs, FAA would entertain the acquisition of homes in the existing departure RPZs and assist the county to transition, as soon as possible, from the current noise-based 14 CFR Part 150 acquisition program into an acquisition program based on the RPZ standard. This practice has been used to enhance RPZs at many airports nationwide.

We view this as a realistic option for the airport as over \$7 million in FAA grants has already been expended to acquire 23 homes in the departure RPZ for Runway 30. Approximately 24 additional homes in the Runway 12 and 30 departure RPZs are expected to be purchased in the next phases of the land acquisition and relocation program. This leaves, by our count, just a few homes remaining to be acquired to clear the departure RPZs of all homes. Acquiring these few remaining homes would achieve the county's goal of removing all homes from the airport's departures RPZs.

The use of declared distances resulting in the loss of 460 feet for departures on Runway 30 would adversely affect a significant number of operations at the airport, including the Boeing

business jet, Citation 750, Learjets (30, 40, 55, and 60 series), Falcon jets (50, 900, 2000), Hawker 700 and 800, Gulfstream 200, and Gulfstream II, III and IV type aircraft.

As discussed above, FAA will not apply the use of declared distances that restrict access to an airport where alternative means are available to meet the RPZ requirements, which is the case at SUA.

Again, we appreciate the county's efforts to address a very difficult local community concern. As indicated above, this letter represents the consensus of both FAA Headquarters and the Southern Region on these matters. FAA stands ready to support the county in mitigating aeronautical impacts on the local community while maintaining access to this valuable federally assisted airport.

Sincerely,



Robert B. Chapman
Manager, Airports Division

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