



August 19, 2015

Mark R. Baker
President and CEO

The Honorable Randy McClement
Mayor
City of Frederick
101 N. Court St.
Frederick, MD 21701

RE: An Ordinance to Rezone the Renn Property from Light Industrial (M1) to Mixed Use (MU-2)

Dear Mayor McClement,

The Aircraft Owners and Pilots Association (AOPA) is a membership organization consisting of more than 350,000 pilots, aircraft owners and aviation enthusiasts, of which 570 reside in Frederick County, MD. AOPA is committed to ensuring the continued viability, growth and development of general aviation and airports in Maryland and the United States.

We appreciate the opportunity to comment on the proposed ordinance to rezone the Renn Property from "Light Industrial" to "Mixed Use". The Frederick Airport Commission recently recommended that the ordinance be opposed. AOPA supports the decision of the Airport Commission and respectfully encourages the Board of Aldermen to vote against the proposed ordinance. Mayor McClement, if the Board of Aldermen is equally divided and you have an opportunity to vote on the ordinance, AOPA respectfully encourages you to disapprove.

There are many unfortunate examples of airports that were permanently closed because incompatible land use was allowed to propagate in the areas surrounding the airport. It is up to the City to prevent incompatible land use through appropriate zoning and enforcement. While the Planning Commission has considered the applicable Runway Protection Zones and Inner Safety Zones prior to their recommendation to rezone, the Planning Commission may not have fully considered the long-term consequences of rezoning the Renn Farm property. Rezoning the property to "Mixed Use" would allow residential housing to be developed inside the Airport Contour Zone.

The proposed development would place residential housing directly beneath the flight paths of arriving and departing aircraft. Helicopter traffic is especially common, at low altitudes, directly above the Renn Farm property. Although those residing in the development would be made aware of the airport in advance, the City should expect complaints from the residents over aircraft noise and safety concerns. Such complaints can eventually lead to broad anti-airport sentiment and political action to close the airport.

As a condition of accepting federal aid for the benefit of Frederick Municipal Airport, the City became bound by Title 49 U.S.C. §47107. The section contains a set of obligations known as

Federal Grant Assurances. The Federal Aviation Administration's *Airport Compliance Manual* (FAA Order 5160.9B) serves as a guide to airport sponsors currently under such obligations. Grant Assurance 21 requires the airport sponsor to ensure compatible land use in the vicinity of the airport. On the topic of zoning and land use planning, the Order states "Where the sponsor does have authority to zone or control land use, FAA expects the sponsor to zone and use other measures to restrict the use of land in the vicinity of the airport to activities and purposes compatible with normal aircraft operations. Restricting residential development near the airport is essential in order to avoid noise-related problems." AOPA respectfully encourages the City to preserve federal funding eligibility for the Airport by continuing to comply with Grant Assurance 21.

Over the years, the City has done well to protect and grow Frederick Municipal Airport. As one of the largest airports in Maryland, it is home to 193 based aircraft. Over 94,000 aircraft operations are conducted at the Airport annually. A 2014 economic impact study prepared for the Maryland Aviation Administration reported that Frederick Municipal Airport supports 1,059 jobs, resulting in more than \$59 million in personal income. The City benefited from an additional economic impact of over \$151 million from local purchases, taxes, and business revenue.

As the population of Frederick grows, the future capacity of Frederick Municipal Airport to meet new economic demands must be considered. The most recent Airport Layout Plan includes an extension of the longest runway to 6,000 feet. The extension will allow access for more types of airplanes. With greater access comes greater economic benefit. AOPA encourages the City to recognize the Airport as an economic engine worth protecting.

The Frederick Airport Commission has spoken loud and clear in opposition to the proposed ordinance. AOPA respectfully urges you and the Board of Aldermen to oppose the proposed ordinance as well. Thank you for the opportunity to share our comments and I look forward to working with you in the future on growing our airport and its economic impact.

If we can be of further assistance please contact Adam Williams, Manager, Airport Policy at 202-609-9702 or adam.williams@aopa.org.

Sincerely,



Mark R. Baker

CC:

Mr. Josh Bokee, Alderman
Mr. Phil Dacey, Alderman
Ms. Donna Kuzemchak, Alderman
Mr. Michael O'Connor, Alderman
Ms. Kelly Russell, Alderman
Mr. Rick Johnson, Manager, Frederick Municipal Airport
Mr. Jon Harden, Chairman, Frederick Airport Commission

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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