



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • Fax (301) 695-2375
www.aopa.org

March 26, 2007

Mr. Danny Murphy
Acting Aviation Director
City of Phoenix Aviation Department
Phoenix Sky Harbor International Airport
3400 E Sky Harbor Blvd, Suite 3300
Phoenix, AZ 85034

Dear Mr. Murphy:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of 411,000 members, more than two-thirds of the nation's pilots including more than 12,100 who live in the state of Arizona. AOPA is committed to ensuring the future viability and development of general aviation airports and their facilities as part of a national transportation system.

The purpose of this letter is to express our serious concerns regarding the preferred alternative recommended for the draft Phoenix Deer Valley Airport Master Plan. A number of our members have shared their concerns with us about the recommended alternative and after reviewing the draft, we concur. We are concerned because the new plan will have a significant impact on our members by:

- Eliminating the current T-hangar area on the south side of the airport replacing them with corporate facilities.
- Moving all small general aviation aircraft into an expanded hangar complex, with associated increased costs for new hangar construction, on the north side and
- Conceivably force all general aviation aircraft to utilize the smaller parallel runway or face extended taxi times to reach the longer south side runway.
- There is also concern that due to the construction of new hangars, hangar lease rents would increase by a factor of 3 to 4 times the current rates.

Generally, AOPA does not comment specifically on airport master plan updates since they are unique to each airport. However, we believe that Deer Valley Airport may have a strong desire to attract more turbine aircraft to the airport at the expense of local tenants and businesses that support light general aviation operators. An airport that seeks to attract these aircraft more often than not will marginalize and push smaller piston powered general aviation aircraft out of the way in the name of progress. Van Nuys and Palomar-Carlsbad airports in California are examples of this where it took local aircraft operators many years and action with the Federal Aviation Administration (FAA) to regain facilities for these operators. While turbine operators clearly are an important portion of overall airport economic impacts, light general aviation aircraft also provide similar benefits to the local community.

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The draft Master Plan does not directly address hangar development. Instead, it is left to private developers as "aircraft storage facilities are not eligible for FAA funding and resources from the City are limited." This is not true from the FAA perspective. In the Vision 100 reauthorization legislation, funding for revenue-generating facilities such as T-hangars and fuel farms, is available to airport sponsors provided they first plan for necessary airside requirements. AOPA expects that this provision will continue in the current FAA reauthorization now working its way through Congress.

Even so, the draft Master Plan does not adequately address how the airport will handle the transition from the preponderance of aircraft storage hangars on the south side to new facilities on the north side of the airport. In fact, the phasing laid out in Chapter 6 seems to indicate that the old hangars will be torn down, the pavement resurfaced, and later on in the intermediate term, new hangars may possibly be built by private developers after the North Public Ramp construction is complete. Have provisions been made to accommodate the existing tenants and where will the forecasted additional 244 single and multi-engine airplanes be placed in the short-term timeframe? FAA regulations and policy are very clear in that existing tenants can't simply be displaced due to a construction project that redefines the physical airport. These tenants must be provided with alternative facilities on the airport.

We believe DVT should develop hangar areas on the north side of the airport prior to displacing tenants on the south side without adequate hangar facilities. Further, in order to better accommodate the forecasted growth and relocation, we feel that the airport sponsor should be directly involved in the new hangar development instead of waiting for private developers to step forward. This would allow the airport to develop a line of revenue, minimize costs and while hangar rents will increase due to brand new construction, there can be reasonable increases over a phased-in approach for your loyal tenants. We also feel that the master plan inventory did not adequately identify the condition of the hangar units to justify the demolition of them in the short-term period.

The last concern that our members expressed to us is the creation of a potential bottleneck of aircraft coming out of the north side hangar areas and only utilizing the shorter, north side runway, 7L/25R. If all of the existing aircraft storage hangar facilities are moved to the north side, and new hangars are built to meet demand, more than 2,000 aircraft will be stored on the north side of the airport, moving in and out of that area. Without better access to the southern runway, AOPA is concerned that the airport's efficiency will suffer. Even though DVT has a control tower, during times of high operations the ability to move an aircraft to and from the southern runway in a timely manner from the northern hangars may result in longer wait times to use the runway. Maintaining some level of T-hangars on the south side for smaller general aviation aircraft would alleviate that problem.

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AOPA commends the City of Phoenix for their vision of DVT and their willingness to address the issues of continued development. We offer the above suggestions in the hope that the needs of the current and future tenants are addressed in a manner that allows the airport to continue to be viable and a vital asset to the City and surrounding community.

Thank you for your consideration of our views on this issue. If we can be of further assistance please contact our staff at 301-695-2200.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Dunn", with a long horizontal flourish extending to the right.

Bill Dunn
Vice President
Airports

cc:

Mr. Alan Kennedy, Member, Phoenix Aviation Advisory Board
Ms. Karen Apple, Project Manager, City of Phoenix Aviation Department
Mr. Barclay Dick, Director, AZ Department of Transportation, Aviation Division
Mr. Brian Armstrong, Manager, FAA Los Angeles Airports District Office
Mrs. Stacy Howard, AOPA Western Regional Representative
Mr. Arthur Rosen, AOPA Airport Support Network Volunteer DVT