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February 26, 2008

Honorable Joseph E. Smith, Chairman
St. Lucie County Board of County Commissioners
2300 Virginia Avenue
Fort Pierce, FL 34982

RE: Communications tower on St. Lucie County International Airport
FAA Aeronautical Study 2006-ASO-250-NRA

Dear Chairman Smith:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of 414,000 members, more than two-thirds of the nation's pilots – including over 33,145 members in the state of Florida. On behalf of our membership, AOPA is committed to ensuring the future viability, safety and development of local general aviation airports and their facilities as part of a statewide and national air transportation system.

We are writing to express our serious concern regarding the construction of a communications antenna tower on the St. Lucie County International Airport (FPR). FPR is a significant general aviation airport with 180-based aircraft and over 190,000 operations each year.

A number of local pilots have contacted us with complaints that this structure's height and location is a significant safety hazard to operations at FPR. The tower is located in an area used as a transit route by helicopters including the Sheriff's Department under a Letter of Agreement with the Federal Aviation Administration (FAA) Air Traffic Control Tower at the airport. During visual flight, the antenna tower can be seen. However, during times of instrument conditions, it is very likely approaching or departing aircraft would not see the tower.

AOPA has conducted an analysis of the above referenced Aeronautical Study and determined that the structure is 785 feet horizontally from aircraft approaching runway 27. With the structure's height of 125 feet above ground level (AGL), the height exceeds that of aircraft approaching the runway, and would pose an extreme safety hazard for both persons on the aircraft and people on the ground. Because of the structure's height and location, the likelihood for a collision between aircraft and this structure is extremely high.

While we understand that this structure has already been constructed, the structure violates United States Title 14 Code of Federal Regulations Part 77 standards by some 82 feet. With knowledge that the tower fails to meet federal safety standards, the airport and county could face significant exposure to liability claims should an aircraft accident occur as the result of having approved construction of this hazard to air navigation.

We urge you to revisit this issue and either reduce the antenna tower height to comply with safety standards or relocate the tower to another more appropriate location.

We thank you for considering our comments.

Respectfully,

Bill Dunn
Vice President
Airports

cc: Commissioner Doug Coward
Commissioner Paula A. Lewis
Commissioner Charles Grande
Commissioner Chris Craft

Airport Director Diane Lewis

Mr. Miguel Martinez, Program Manager
Federal Aviation Administration
Orlando Airports District Office