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June 2, 2011

Mr. Daniel D. Saunders  
Acting Administrator and Deputy Historic Preservation Officer  
State of New Jersey  
Department of Environmental Protection  
Natural and Historic Resources  
Historic Preservation Office  
P.O. Box 420  
Trenton, NJ 08625-0420

RE: Application for Historic Preservation of Cape May County Airport (WWD)

Dear Mr. Saunders:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of over 400,000 members, more than two-thirds of the nation's pilots, including nearly 8,300 in the State of New Jersey. AOPA is committed to ensuring the future viability, safety and economic development of general aviation airports and their facilities as a vital part of a state and national transportation system and economic development engines.

We are writing to express our concerns regarding an application now before the agency seeking a Historical Designation for what essentially is the entire Cape May County Airport in Wildwood, NJ. AOPA strongly opposes this request which will in our opinion have a detrimental effect on the continued viability and improvement of the airport as well as adjacent, existing, and planned new facilities.

Our research to date indicates that numerous buildings on the airport have undergone significant structural and exterior modifications with the application of modern building materials used in the improvement processes. Therefore, these facilities are no longer of the era or construction which would qualify as historically significant.

Additionally, approval of the request would have a significant and detrimental effect on the airport's ability to meet future aviation facilities and infrastructure demands.

In reviewing data available to us which depicts the boundaries of the designation request, we note that the area also includes the airport's runways and taxiways. Since these facilities were initially constructed, numerous improvements and reconstruction have occurred. We simply do not believe that runways and taxiway facilities meet the criteria for historic designation any more than a paved portion of a street would be classified historically significant.

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Cape May County, as owner of the airport and the Delaware River and Bay Authority (DBRA) as leasee and operator of the airport, have, since 2000, planned for a number of significant improvements to the airport to better serve the needs of the aviation transportation system. These improvements include new aircraft hangar facilities, new taxiway construction, road construction, a runway extension and other development that will increase the value of the airport to the community and allow continued economic development in the region.

In closing, we would like to note that the Cape May Airport was conveyed to the County as Federal Surplus Property via a Quit Claim Deed. That conveyance contains a number of covenants that require that the airport continue to operate as an airport and no restrictions will be implemented which would diminish the value or restrict the airport.

For the above reasons, AOPA urges that the application for Historic Designation for Cape May County Airport be rejected as not meeting the criteria necessary.

We appreciate your consideration of our views on this subject.

Respectfully,

A handwritten signature in dark ink, appearing to read "Bill Dunn", followed by a long horizontal line extending to the right.

Bill Dunn  
Vice President  
Airport Advocacy