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1 February 2023

Stephen Bannon, Chair
Town Select Board
334 Main Street
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TRANSMITTED BY ELECTRONIC SUBMISSION

Email: sbannon@townofgb.org

Re: Great Barrington / Walter Koladza Airport (GBR).

Chairman Bannon and members of the Great Barrington Select Board,

My name is Sean Collins, and I am the Eastern Regional Manager for the Aircraft Owners & Pilots Association (AOPA). We are the world's largest aviation non-profit membership organization committed to ensuring the safety, future viability, and development of general aviation as an integral part of a national transportation system. I write this letter to respond to concerns raised by abutters of the Great Barrington airport and to provide the Select Board with our insight and national perspective of what is 'normal and customary' at similarly situated airports across the country.

ECONOMIC IMPACT OF MASSACHUSETTS AIRPORTS

Massachusetts' network of airports is a vital component of the state's transportation system. It is comprised of 38 public-use airports that generate \$24.6 billion in annual economic impact and support 199,237 jobs. These airports provide vital access to national and international networks, connecting people and businesses with goods and services, including healthcare. Your airports are at the forefront of national preparedness and serve as staging points during weather disasters and as rallying points in times of national crisis. The [Mass DOT 2019 statewide airport economic impact report](#) attributes \$5.2 million in annual economic impact and 56 jobs to GBR itself.

Much of the impact associated with general aviation airports like GBR is in the way of 'secondary impacts'—i.e., an employee from the airport or business based at the airport earns an income. That revenue is taxed as income and then expended across the community through the purchases of goods and services which are also taxed in various ways. Over time, these transactions add up to support other jobs and businesses within the community while preserving the all-important access afforded by the airport.

AIRPORT OPERATIONS

According to the FAA airport master record, GBR is home to 40-based aircraft and approximately 17% of operations are attributed to transient or non-local aircraft. Berkshire Aviation Enterprises primarily consists of three lines of business: aircraft maintenance, flight training, and airport services. The services division primarily caters to based aircraft while the maintenance division likely divides work evenly between training aircraft, based aircraft, and transient operators—those who are based elsewhere but fly in specifically for maintenance services. The flight school caters to members of the public, young and old alike, interested in learning to fly. While some partake in flight training as a hobby, many use their pilot certifications in furtherance of business, using aircraft in the same manner most of us use automobiles.

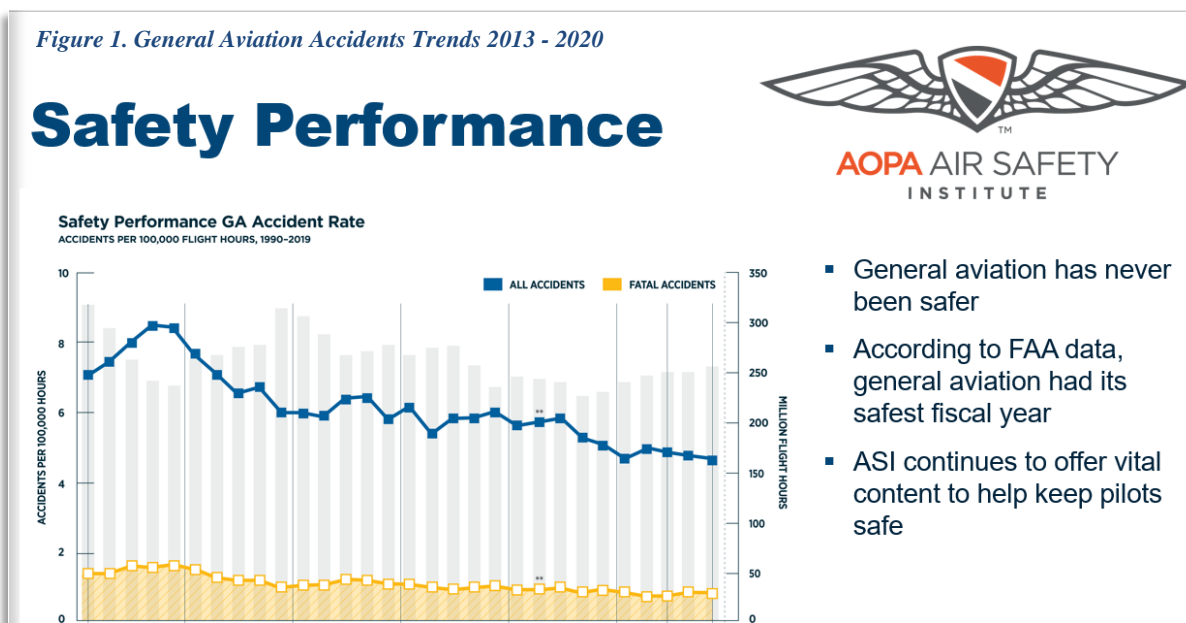
Others will continue to progress toward advanced certificates and ratings in an effort to pursue careers in aviation.

According to a [recent study](#), Boeing anticipates doubling the commercial airline fleet over the next two decades, helping drive demand for aviation careers. Shortages of aviation professionals create exceptional opportunities for students. Boeing estimates that by 2041, global demand will require 602,000 new pilots, 610,000 new maintenance technicians, and 899,000 new cabin crew members. General aviation (GA) airports serve as the cradle for local pilots like [Kira Von Steinberg](#), who learned to fly at GBR before advancing her career to fly in the United States Navy!

Life Star helicopters are a common sight at GBR due to the airport's proximity to Fairview Hospital. As you are likely aware, Life Star is a critical care helicopter service that responds to and provides air transport for a variety of patients who require care from tertiary care facilities. The residents of Great Barrington and the surrounding communities are fortunate to have access to this important life-saving service as a byproduct of having the airport in their community!

AVIATION SAFETY

General aviation has never been safer! [The Nall Report](#), published by AOPA's Air Safety Institute, analyzes GA accidents in U.S. National Airspace and on flights departing from or returning to the U.S. or its territories or possessions. The report covers airplanes with a maximum gross takeoff weight of 12,500 pounds or less. GA had its safest fiscal year on record in 2021, (see [Figure 1.](#)). In 2020, the accident rate was 4.69 accidents per 100,000 flight hours—the fatal accident rate was 0.86%, [[accident rate data not yet available for 2021 and 2022](#)].



Interestingly, aircraft age is not a safety factor. Any perception that “*old aircraft are unsafe*” is likely precipitated by the perception of “*old*” cars. Unlike automobiles, aircraft are inspected annually and more frequently if used for hire, such as for flight training. All are required by federal regulation to be maintained to a high standard. In fact, the average age of a piston-powered GA aircraft is more than 35 years and aircraft over 50 years are common.

For pilots, FAA certificates are issued without expiration. As such, maintaining pilot proficiency is a core tenet of the industry. In fact, the FAA sets rigorous standards for students to be able to earn a pilot certificate, as well as for certificated pilots to continue exercising the privileges of their certificate. First, a private pilot applicant must have a minimum of 40 hours of flight training (although the national average is over 70 flight hours) before he or she is eligible to take a practical test with an FAA examiner, known as a “check ride”. Once a pilot earns their certificate, the FAA requires stringent currency requirements that include a “flight review” with a certified flight instructor (CFI) within the preceding 24 calendar months to continue to operate as the Pilot in Command—a term that identifies legal responsibility for a given flight. To be able to carry passengers, these pilots must have logged a minimum of three takeoffs and landings within the preceding 90 days. Additionally, pilots that have earned an Instrument rating – which permits flights without reference to the ground such as when flying through clouds - must log specific recurrent training elements within the preceding 6 calendar months to continue to exercise these privileges. Active flight training combined with the necessity for pilots to maintain flight proficiency tends to result in a higher frequency of operations in the local traffic pattern.

AIRPORT CONDITIONS

At 2,579 feet in length, GBR’s runway is typical of most privately operated airports, having runways that are slightly shorter than the average municipal airport. The shorter runway does not equate to being unsafe. The average 4-seat piston-powered aircraft such as a Cessna 172 Skyhawk or Piper Archer PA-28, aircraft typical of those operating at GBR, generally use less than 1,400 feet to takeoff and less than 1,000 feet to land; providing over 1,000 feet of safety margin. Many aircraft that call GBR home like Piper Cubs offer greater performance, halving the distances used in the prior example. Of greater importance to the overall safety of operations in the terminal environment is the ability of the zoning authority and airport to maintain clear approach and departure zones—i.e., preventing new development and vegetation growth from interfering with these high-traffic corridors. As the town is aware, Chapter 90 of the Massachusetts General Laws has codified clear airspace standards to ensure the utmost level of safety for public-use airports like GBR. In summary, the runway length at GBR does not make the airport unsafe. The requirement to maintain obstruction-free approaches to the airport will keep the airport safe.

AIRPORT NOISE

The Airport Noise & Capacity Act of 1990 preempts municipalities and states from enacting local flight restrictions. Many of the problems at airports today are the direct result of a lack of thorough planning for compatible land use. By the same token, almost every concern about airport noise and safety can be eliminated through responsible, long-term land use planning. It is obvious that over the years the community has grown around the airport resulting in an increase in noise concerns. While it is nearly impossible to reverse prior planning decisions, it is not too late to properly protect the airport for the future.

Many noise control strategies are easy to implement and painless to use, including “fly-friendly” programs. AOPA recommends working with the airport to establish designated runup areas away from the perimeter of the airport. They may also be able to establish a “preferred runway” under certain conditions as well as create and display a map of noise-sensitive areas to educate pilots. The airport can also implement pattern procedures and altitudes that minimize noise impact on the ground including asking pilots to use the maximum safe climb rate during takeoff. Berkshire Aviation Enterprises has likely already implemented a number of these recommendations in response to community concerns.

ENVIRONMENT

A common concern of communities near some airports is that aircraft are emitting airborne lead. The aviation industry has worked for decades to find a lead-free fuel solution, and **we are 100% committed to getting lead out of aviation fuel**. In fact, AOPA is leading the industry's effort to find a fleetwide, drop-in unleaded replacement. We co-chair the [EAGLE Initiative](#) with the FAA which stands for *Eliminate Aviation Gasoline Lead Emissions*—this industry initiative is solving the logistical challenges associated with regulations, manufacturing, and dissemination of unleaded fuel by the end of 2030.

Why is there lead in aviation fuel?

The majority of aircraft in the general aviation fleet was designed to operate with fuel formulated to prevent damaging engine detonation that can result in a sudden engine failure. For decades, a lead-based additive has been the only solution to get the high octane needed to prevent detonation.

The hardest step was to develop a new fuel that can be used across all aircraft within the US piston-engine fleet. We are delighted to acknowledge that five months ago, the FAA approved the new unleaded fuel developed by General Aviation Modification Inc. (GAMI)! This means we now have fuel available for fleetwide replacement of 100LL (the current leaded fuel). The hardest part is over—now the next challenge is for refiners, blenders, and retailers to hammer out how best to scale up manufacturing while also figuring out the logistics of getting the new fuel out to all airports across the country. This process is likely to take two to three years to fully implement by the nature of having such vast aviation infrastructure across the country with more than 5,000 public-use airports. To keep up to date on the industry's progress, we invite members to the public to visit: <https://www.aopa.org/advocacy/100-unleaded-avgas>.

As it relates to the imposition of local lead contamination, it is AOPA's understanding that multiple soil and water quality tests have been performed by independent laboratories at airport abutters' homes, and fortunately, the associated lead levels were found to be negligible. As communities grapple with similar concerns about their local airports, some have performed studies, like Middleton, Wisconsin, and similarly found no evidence of lead contamination poisoning associated with their airport.

We thank you for your consideration of our views and welcome the opportunity to serve your town as a resource on aviation matters. If you have questions or require additional information, please contact me directly at 301-695-2090 or sean.collins@aopa.org.

Sincerely,



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Eastern Regional Manager

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