



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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October 19, 2007

VIA FACSIMILE

Jason K. Watt
Program Manager
Federal Aviation Administration
Great Lakes Region
Detroit Airports District Office, DET ADO-614
11677 South Wayne Road, Suite 107
Romulus, MI 48174

Re: Federal Register Notice 07-4650, Public Notice for Waiver of Aeronautical Land Use Assurance; Pellston Regional Airport; Pellston, MI

Dear Mr. Watt:

The Aircraft Owners and Pilots Association (AOPA) submits the following comments for inclusion in the public record regarding the above reference Federal Register notice.

AOPA represents the general aviation interests of 412,000 members, more than two-thirds of the nation's pilots – including 12,074 of our members in the state of Michigan. On behalf of our membership, AOPA is committed to ensuring the future viability and development of general aviation airports and their facilities as part of a national transportation system.

At issue is the proposed change in use of 621.46 acres of airport property at the Pellston Regional Airport (PLN) from aeronautical to non-aeronautical use. This is a large segment of property at the airport with parcels surrounding 3 sides of the runways. Specifically our concern is that by changing the use designation and leasing parcels B, D and E as delineated on Map A1 for an extended period to a single tenant, the airport sponsor may inhibit or even prohibit future aeronautical development and growth at the airport.

It is our understanding that planned development on these parcels will be small – a hangar facility, warehouse facility and crisis action center with perhaps a few more additional buildings during the course of the lease in addition to new roadways. This raises the question of why such a large amount of land is requested to change to non-aeronautical use, particularly parcels fronting the runways and taxiways that would be lost to future aeronautical development or even an airport commercial/industrial park.

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We are also concerned that by executing such a long-term lease, despite the positive generation of revenue, the airport sponsor might place themselves in a position to not be able to exercise their rights and powers over the property. AOPA would encourage Emmet County as the sponsor to guard against this and to take steps to retain positive control such that the parcels with current or future runway access might again become aeronautical use property. As the official sponsor of the airport, Emmet County has the legal responsibility under the FAA Grant Assurances (specifically Assurance #5) to maintain rights and powers of control over this property in order to protect the airports viability.

We request that the FAA through the Airport District Office, work with the airport sponsor to determine the realistic amount of land needed to accommodate the planned non-aeronautical development. Additionally, reasonable limits should be established as to the amount of property redesignated to non-aeronautical use based on the immediate needs. In so doing, the sponsor would ensure that only land necessary for the project is removed from aeronautical activities.

We also request that a comprehensive review be made of forecast aeronautical activity and based aircraft. This review should focus space needed for future aeronautical development on the airport such as T-hangars, corporate hangars, fixed base operations, etc.

It is our sole intent to ensure that any proposed release or reclassification of airport property for other than airport related activities is in the best interest of the aviation community and the airport. We commend the local leadership for seizing this opportunity. However, we are extremely concerned that a significant portion of the airport (37%) will be lost and that future aeronautical development will be stymied by a lack of available property.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Collins', with a stylized flourish at the end.

John L. Collins
Senior Liaison
Airports